



## ANTI-CORRUPTION GUIDELINES

### Norgesdekk has a zero tolerance policy on corruption

This document describes Norgesdekk's guidelines, which are designed to raise awareness of corruption and enable the company's employees to identify and put a stop to corruption.

Corruption is a person's abuse of their position in order to obtain personal or commercial advantages for themselves or others. Corruption is illegal. The definition of corruption in the Norwegian Penal Code includes both active and passive corruption, as well as trading in influence.

Active corruption is where someone offers someone else an advantage in connection with a position, office or assignment. Passive corruption is where someone demands, receives or accepts an advantage offered in connection with a position, office or assignment. It is also illegal to influence a person in a corrupt manner, which is known as trading in influence.

An advantage is anything that the recipient can see as a gain or can benefit from and it does not have to be money or valuables. Such advantages can include, for example, concert tickets, gifts to charities, travel, contracts and assignments.

### General guidelines

- Nobody is permitted to receive advantages from the company's business associates, such as gifts, discounts, travel or bonuses for private purchases, loans, etc. This also applies to the close associates of employees if the advantage is given because of the employment relationship.
- Advantages that the company has obtained for all employees in all or part of the country, such as a department, are excluded from this rule.

### Gifts

- On special occasions, employees are nevertheless permitted to receive (courtesy) gifts with a value of up to NOK 500.00. Gifts with a value of more than NOK 500.00 must be reported to the employee's immediate superior, who will decide whether or not it can be kept in the particular case, based on the situation. Internal gifts are covered by separate rules in the employee handbook.
- Gifts that are given on behalf of the company must be of a moderate nature and may not exceed a value of NOK 500.00. The company's motives and the recipient's integrity must not be called into question. Nobody may give gifts or other benefits on behalf of the company for the purpose of obtaining benefits in return that are to their own advantage.

Norgesdekk AS Avd Jæren  
Jærveien 338  
4322 Sandnes  
TLF 51 78 68 60  
post@norgesdekk.no

Avd Kristiansand  
Stemmane 6  
4636 Kristiansand  
TLF 38 10 71 71  
kristiansand@norgesdekk.no

Avd Bergen  
Nordre Toppe 6  
5878 Bergen  
TLF 55 39 16 50  
bergen@norgesdekk.no

Avd Tønsberg  
Borgeskogsvingen 15  
3160 STOKKE  
TLF 33 31 33 33  
tonsberg@norgesdekk.no

Avd Oslo  
Landskaugveien 50  
1914 Ytre Enebakk  
TLF 22 07 28 30  
oslo@norgesdekk.no

Avd Trondheim  
Øybergveien 133  
7224 Melhus  
TLF 72 87 11 00  
trondheim@norgesdekk.no

Avd Narvik  
Ornesveien 5  
8517 Narvik  
TLF 76 95 53 00  
narvik@norgesdekk.no

## Events

Events organised by Norgesdekk must be characterised by sobriety and have relevant professional content.

## Openness

The company's business must be characterised by openness. To ensure verifiability and transparency, employees must be open about their actions when they are representing Norgesdekk.

## Whistleblowing

Whistleblowing is reporting censurable conditions to someone who can do something about it. If you suspect that a colleague is committing a criminal act, you have an obligation to report this.

Whistleblowing guidelines can be found in the HSE handbook.

Breach of the guidelines may have consequences under applicable laws, regulations, collective bargaining agreements and rules.

## Questions checklist

The following questions checklist can help you if you are uncertain about whether you can attend an event, accept an invitation or receive a gift.

### **If you are in any doubt, discuss the matter with your manager or the HR Manager.**

- 1) Have you received a gift/invitation publicly that stands up in the light of day? Is it OK to tell your manager, your colleagues and/or your loved ones about it? If the answer to any of these questions is no, you should think carefully about it. You may be about to make an unwise and incorrect decision that you should turn away from.
- 2) Would I be offered this if I held a different position? If the answer is no, you should think carefully about it. In some cases, it is perfectly fine to accept the offer anyway.
- 3) What is the intention behind the gift/invitation? Is something expected in return? If you are suspicious about the intention of the gift/invitation, or there is an expectation of something in return, you should decline.
- 4) Are we in a tendering/negotiation situation? If we are in a tendering or negotiation situation with the sender of the gift/ invitation, you should generally decline. Accepting a gift/invitation from someone we are in a tendering or negotiation situation with can easily be perceived as "oiling the wheels". You should always raise the matter with your manager if you find yourself in this kind of situation. The same also applies to sending gifts or invitations to customers with which we are in a tendering situation.

- 5) Is the gift/invitation being given to an individual person or to the company? Gifts/invitations that are targeted towards a specific person are often more suspicious than gifts/invitations that are given to the company. Ask yourself why the gift/invitation is being given to you personally and not to the company. What is the intention behind the gift/invitation?
- 6) Significant or negligible value? If the value is significant, you should generally decline. Significant value means gifts worth more than NOK 500.00
- 7) Could we have given a gift of the same value? Could we have issued a similar invitation? If the answer is no, you should not accept the gift/invitation. If the answer is yes, you can ask yourself the other questions on the checklist
- 8) Is the gift delivered at home or at work? If the gift is delivered at home with the intention of concealing it, you must decline.
- 9) Who is paying for travel and accommodation? Travel in connection with work must not be paid for by external partners/suppliers, unless it is for the purpose of providing training.
- 10) Is the professional content of sufficient quality and relevance? If the answer is no, you should decline the invitation.