

Norgesdekk - Policy for Code of Conduct

1. Introduction

Norgesdekk shall conduct its business in a responsible, sustainable and ethical manner. Our guidelines are based on respect for people, the environment and society, and are intended to contribute to long-term value creation for customers, employees, suppliers and other stakeholders.

The policy is based, among other things, on the principles of:

- The Norwegian Transparency Act
- OECD Guidelines for Responsible Business Conduct
- United Nations human rights principles
- ILO core conventions
- Applicable environmental, working environment and anti-corruption legislation

The guidelines apply to all employees, managers, hired personnel, suppliers and business partners who represent Norgesdekk or provide goods and services to Norgesdekk.

Norgesdekk expects everyone acting on behalf of the company to conduct themselves in accordance with our values:

Honesty - Respect - Commitment - Collaboration

Norgesdekk became Eco-Lighthouse certified in 2023, and all departments were recertified in 2025. Environmental and sustainability work is an integrated part of the company's strategy and daily operations.

2. Human Rights and Working Conditions

Norgesdekk respects internationally recognised human rights and actively works to promote good working conditions in its own operations and throughout the supply chain.

We have zero tolerance for:

- discrimination
- harassment and bullying
- forced labour
- child labour
- improper treatment of employees

All employees shall be treated with respect and equality, regardless of gender, age, ethnicity, religion, disability, sexual orientation or other background.

Norgesdekk actively works with:

- diversity and inclusion
- gender equality
- skills development
- employee satisfaction
- prevention of sickness absence

We expect our suppliers and business partners to follow the same fundamental principles and to work systematically with responsible working conditions and human rights throughout the value chain.

3. Health, Safety and the Working Environment (HSE)

Safety and the working environment shall always be prioritised. Norgesdekk continuously works to improve HSE and to prevent injuries and work-related incidents.

All employees shall:

- follow applicable HSE procedures
- use required personal protective equipment
- contribute to a safe working environment
- report non-conformities, accidents and hazardous conditions

Norgesdekk regularly conducts:

- risk assessments and safety inspections
- employee surveys
- training initiatives
- continuous improvement work

We also expect our suppliers to have systems for health, safety and the working environment, as well as the measures necessary to protect employees and surroundings.

4. Environment and Sustainability

Norgesdekk shall contribute to more sustainable development through responsible choices throughout its operations.

Our work includes, among other things:

- reducing greenhouse gas emissions
- improving energy efficiency
- reducing fuel consumption
- increasing the use of sustainable and recycled materials
- waste sorting and waste reduction
- responsible supply chains
- increasing the use of digital meetings to reduce travel

Norgesdekk complies with relevant requirements and expectations related to the Norwegian Transparency Act. The company also continuously monitors regulatory changes and adapts its operations accordingly.

We expect our suppliers and business partners to conduct their operations in a responsible and sustainable manner, and to actively work to reduce negative impacts on people, the environment and the climate.

5. Anti-Corruption and Business Ethics

Norgesdekk has zero tolerance for corruption, bribery and financial misconduct.

No employee or representative of the company shall:

- offer or receive improper benefits
- give or receive bribes
- misuse their position for personal gain
- act in a manner that may create conflicts of interest

Gifts, invitations and other benefits shall be moderate and must never influence, or be perceived as influencing, business decisions.

Employees shall avoid situations in which personal interests may conflict with the company's interests. Any conflicts of interest shall be reported to the immediate manager.

Norgesdekk expects suppliers and business partners to follow equivalent principles for anti-corruption and responsible business practices. Please also refer to our guidelines for combating corruption.

6. Suppliers and Due Diligence Assessments

Norgesdekk applies a risk-based approach to due diligence assessments in accordance with the Norwegian Transparency Act and the OECD Guidelines.

We expect suppliers to:

- respect human rights and workers' rights
- comply with applicable environmental and HSE requirements
- counteract corruption
- maintain an overview of their own supply chain
- work systematically with sustainability and continuous improvement
- be able to document relevant procedures and measures upon request

In the event of serious or repeated breaches of these principles, Norgesdekk may reconsider or terminate the business relationship.

7. Whistleblowing and Follow-up

All employees are encouraged to report:

- matters worthy of criticism
- breaches of law
- breaches of internal guidelines
- unethical conduct

Reports may be made to the immediate manager or the person responsible for HR, and may be submitted anonymously. Whistleblowers shall not be subjected to retaliation.

All reports are handled confidentially and seriously.

8. Compliance

All employees, suppliers and business partners are expected to be familiar with and comply with this policy.

Norgesdekk may carry out follow-up, dialogue or audits to ensure compliance with the policy and related requirements.

Approved by Norgesdekk AS