

RET-19E Supplier Conduct Principles

1 Introduction

Bertel O. Steen focuses on continuous improvement in sustainability, social responsibility, working environment and business behavior. We have therefore established these Supplier Conduct Principles (the Principles) for all suppliers, i.e. all companies and individuals who supply products or services to Bertel O. Steen AS and subsidiaries (the Supplier). The Supplier shall comply with the Principles and act in accordance with:

- UN Global Compact
- ILOs fundamental conventions; child labor (C138, C182), forced labor (C029, C105), discrimination (C100, C111), freedom of association (C087, C098) and HSE (C155, C187)
- UN Guiding Principles on Business and Human Rights (UNGP)
- UN Convention on the Rights of the Child

We conduct regular evaluations and audits of the Supplier as part of our risk management.

2 National legislation

The Supplier shall operate fully in accordance with the laws, rules and regulations that apply in the countries in which they operate (Legislation). Where the Principles and Legislation cover the same matters, the highest standard shall apply.

3 The Ten Principles of the UN Global Compact

Bertel O. Steen has joined the UN Global Compact, and we require that the Supplier comply with these ten principles of doing business:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

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Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

4 Health and safety

4.1 Workplace safety

Employees' exposure to potential safety risks must be reduced to a minimum through good planning, control, maintenance and continuous safety training.

Employees must be equipped with suitable and well-maintained personal protective equipment (PPE) where required or prior risk assessment so requires.

4.2 Crisis preparations

The Supplier shall have a continuity management system to ensure the business's ability to continue delivering products and services at acceptable, predefined levels after an expected or unexpected disruption.

5 Quality and continuous improvement

Our goal is to deliver world-class quality in everything we do, and to focus on continuous improvement. We expect the Supplier to cooperate openly with us in this work.

The Supplier shall, whenever possible, comply with ISO 9001.

6 Environmental

The Supplier shall identify its significant environmental aspects, and specific goals for improvement shall be set and followed up.

The Supplier shall, whenever possible, comply with ISO 14001 and report according to the Global Reporting Initiative (GRI) or equivalent.

6.1 Dangerous substances

Hazardous substances must be identified and treated in a way to ensure they are safe to handle, move, store, use, recycle, reuse and remove. The Supplier must have an updated substance register, and have carried out a risk assessment for all hazardous substances used.

6.2 Transportation

The Supplier shall focus environmentally friendly choices for transport and when procuring/renting transport vehicles. A minimum of 90 % of transport vehicles used shall meet the requirements of type approval Euro 6 (2014) or newer.

The Supplier shall actively consider co-shipment, time of day and frequency of shipment, and minimization of transshipment.

6.3 Packaging

The Supplier shall focus on environmentally friendly choices for product packaging, including transport packaging. Reuse and recycling of packaging shall be actively considered.

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7 Business ethics and integrity

The Supplier must maintain a high ethical standard.

7.1 Corruption

All forms of bribery and corruption are unacceptable. The Supplier shall not offer or give undue benefit, service, reward or incentive to any customer, agent, sub supplier, organization, public authority or employee. This applies both if this benefit is offered directly or via an intermediary, and whether it is private or work-related.

7.2 Gifts and entertainment

The Supplier shall not, directly or indirectly, offer or accept gifts, representation or expense coverage that can give, or can be perceived to give, an undue advantage in connection with a person's position, responsibilities or assignments, unless the gift is of a value less than NOK 500.

Representation can be offered when there is a legitimate business purpose and the costs are kept within reasonable limits. Reasonable limits is defined as rates corresponding to domestic representation and catering specified in the Government Personnel Handbook.

7.3 Competition

The Supplier must act honestly and professionally with competitors. The Supplier shall not cause or be involved in breaches of Legislation with regard to competition, illegal price collusion or market sharing.

7.4 Privacy

The Supplier shall respect the rights of the employees and third parties, and shall register, monitor and process personal data in accordance with applicable Legislation.

If the Supplier processes personal information on behalf of Bertel O. Steen, the Supplier shall sign a Data Processing Agreement (DPA).

7.5 Money laundering

The Supplier shall distance itself from all forms of money laundering, and shall implement measures to prevent financial transactions from being used by others to launder money.

7.6 Taxes and undeclared work

The Supplier shall report and pay its public taxes and fees in accordance with Legislation, and shall distance itself from undeclared work and work crime.

7.7 Conflict minerals

The Supplier must follow current guidelines and recommendations from the Responsible Minerals Initiative (RMI) to ensure responsible procurement of conflict minerals.

Conflict minerals include tin, tantalum, tungsten, gold (including derivatives), and cobalt extracted in the Democratic Republic of the Congo (DRC) or adjacent countries.

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7.8 Sanctions, blacklists and countries subject to boycott provisions

The Supplier shall take the necessary precautions to ensure that neither they nor their supply chain are involved in business with parties that may be subject to sanctions, are blacklisted or operate in countries that are blacklisted.

7.9 Conflicts of interest

The Supplier shall seek to avoid potential conflicts of interest. Should such a conflict nevertheless arise, this must be reported immediately to Bertel O. Steen.

8 Implementation and administration

8.1 Control system

The Supplier must have a quality and environment management system. The management system shall be designed to ensure that Legislation and Principles are complied with.

ISO 9001 and ISO 14001 are recommended as good starting points for such a management system.

8.2 Responsibility

The Supplier shall appoint a person, in a senior position, who is responsible for ensuring that the Principles are complied with.

8.3 Dissemination of the Principles

The Supplier shall communicate the Principles to all employees and its own supply chain, as well as implement measures to ensure that the Principles are complied with.

8.4 Control

Bertel O. Steen or others authorized by Bertel O. Steen, may carry out inspections at the Supplier and any sub suppliers or contract partners. All relevant documentation that is necessary to check whether the Principles are followed can be required to be submitted, and access shall be granted to all parts of the premises where work is carried out under the contract.

8.5 Documentation

We expect the Supplier to prepare documentation of compliance with the Principles.

8.6 Notification, questions and reporting of concerns

The Supplier shall have a system for non-conformities and whistleblowing, including breaches of the Principles, and shall without delay inform Bertel O. Steen in writing of any reported issues related to business with Bertel O. Steen. We expect full cooperation with regard to investigation of such issues.

The Supplier shall not exercise any form of retaliation against the reporter(s) of non-conformities or whistleblower issues, and shall implement routines that ensure confidentiality and protection of the reporter(s).

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8.6.1 Reporting directly to Bertel O. Steen

Reports can be sent directly to Bertel O. Steen at varsel@bos.no.

8.6.2 Reporting via third party

The Supplier can report via third party: Charles Jensen, partner at HR-huset, varsel@hrhuset.no, telephone 474 63 940. The postal address is: Charles Jensen, c/o HR-huset AS, Sandakerveien 114 b, Postboks 4542 Nydalen, N-0404 Oslo. Such reporting may be made anonymously.

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