

RET-19E Code of Conduct for Suppliers and Other Business Partners

Updated September 2025

1 Introduction

Bertel O. Steen focus on continuous improvement in sustainability, social responsibility, working environment and business conduct. We have therefore established these ethical rules for business partners (“the Guidelines”).

The Guidelines apply to Business Partners of Bertel O. Steen and Bertel O. Steen’s subsidiaries where Bertel O. Steen has a controlling influence.

By “Business Partner” we mean suppliers of products and services that Bertel O. Steen buys, as well as other types of contractual partners such as dealers, agents, distributors and various types of cooperation partners. Each Business Partner is responsible for following the Guidelines at all times.

For these Guidelines to have the intended effect, the Business Partner must accept that these Guidelines apply to the Business Partner’s own supply chain. The Business Partner shall communicate these Guidelines (or equivalent requirements) to its subcontractors and implement reasonable measures to monitor its subcontractors and ensure that they comply with these Guidelines.

1.1 General guidelines

The Business Partner shall comply with the Guidelines and act in accordance with:

- UN Global Compact’s principles for responsible business conduct
- The UN Universal Declaration of Human Rights
- The UN Convention on the Rights of the Child
- The International Labour Organization’s (ILO) core conventions and recommendations on child labour (C138, C182, R146), forced labour (C029, C105), working hours (C001, C014), discrimination (C100, C111), freedom of association (C087, C098, C135, C154), minimum wage (C131), HSE (C155, C187, R164), and employment (C095, C158, C175, C177, C181)
- ISO 9001:2015
- ISO 14001:2015
- OECD Guidelines - Responsible Business
- The Norwegian Transparency Act

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

1.2 Due diligence assessments

The Business Partner must carefully assess whether they affect human rights and working conditions, including whether they cause, contribute to or are directly linked to such negative consequences.

The scope of the Business Partner’s due diligence assessments is the same as under the Transparency Act and the OECD Guidelines for Responsible Business, and includes both its own business and the Business Partner’s supply chain.

The following shall apply in the event of violations of human rights or workers’ rights in the Business Partner’s own business or its supply chain:

- All reports of violations shall be dealt with within a reasonable time and to a sufficient extent

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- All affected parties shall be followed up as needed
- Restorative measures shall be implemented as needed. Restoration shall be proportionate to the nature and extent of any damage, and may entail redress, financial or non-financial compensation, or other. Measures to prevent or minimize the likelihood of recurrence shall be considered.

2 National legislation

The Business Partner shall operate fully in accordance with the laws, rules and regulations that apply in the countries where they operate (Legislation). Where the Guidelines and Legislation cover the same matter, the highest standard shall apply.

3 The Ten Principles of the UN Global Compact

The Business Partner shall comply with their 10 principles for responsible work life:

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.

Anti-Corruption

Principle 10

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

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4 Health and safety

4.1 Workplace safety

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

Workers shall be equipped with suitable and well-maintained personal protective equipment where required or prior risk assessment indicates it.

4.2 Crisis preparedness

The Business Partner should have a system to ensure that the business can continue to deliver products and services at acceptable levels, even after unexpected events.

5 Quality and continuous improvement

We have a goal of delivering world-class quality in everything we do, as well as seeking continuous improvements. We expect the Business Partner to cooperate openly with us in this work.

The Business Partner should, when possible, follow ISO 9001.

6 Sustainability

The Business Partner shall identify its significant environmental aspects, and set and follow up on concrete goals for improvement.

The Business Partner should, when possible, follow ISO 14001 and rely on the Corporate Sustainability Reporting Directive (CSRD) and the corresponding European Sustainability Reporting Standards (ESRS) or equivalent.

6.1 Hazardous substances

Hazardous substances shall be identified and handled in a way that makes them safe to handle, move, store, use, recover, reuse and dispose of. The Business Partner shall have an updated substance register, and have conducted risk assessment for all hazardous substances used.

6.2 Transport

The Business Partner shall have a focus on the environment in the choice of transport method and when purchasing / renting transport vehicles. We expect the business partner to set its own goals for reducing annual emissions of CO2 equivalents.

The Business Partner should actively consider co-shipping, timing and frequency of shipment, and minimizing reloading.

6.3 Packaging

The Business Partner shall have a focus on the environment in the choice of packaging for its products, including transport packaging. Reuse and recycling of packaging should be actively considered.

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7 Business ethics and integrity

The Business Partner shall maintain a high ethical standard.

7.1 Corruption

All forms of bribery and corruption are unacceptable. The Business Partner shall not offer or give undue advantage, service, reward or incentive to customer, agent, contractor, organization, supplier, public authority or employee of any of these. This applies whether this advantage is offered directly or through intermediaries, and whether it is private or work-related.

7.2 Gifts and representation

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

Representation may be offered when there is a legitimate business purpose and the costs are kept within reasonable limits. By reasonable limits we mean equivalent rates for domestic representation and hospitality stated in the State Personnel Handbook.

7.3 Competition

The Business Partner shall act honestly and seriously towards competitors. The Business Partner shall not cause or be involved in breaches of Legislation regarding competition, illegal price cooperation or market sharing.

Integrity The Business Partner shall act ethically, responsibly, fairly and professionally at all times. The Business Partner shall ensure that all information it produces or manages, is prepared, stored, shared and reported in an honest, balanced and correct manner.

7.4 Data Privacy

If the Business Partner processes personal data on behalf of Bertel O. Steen, the Business Partner shall sign a data processing agreement.

The Business Partner shall respect the rights of the data subjects, and shall register, monitor and process personal data in accordance with applicable legislation and Bertel O. Steen's principles for privacy.

If the Business Partner operates directly or indirectly outside the EU/EEA, the Privacy Manager at Bertel O. Steen shall be informed. Privacy mapping of system/application and necessary legal assessments shall be performed.

7.5 Money laundering

The Business Partner 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 Tax and undeclared work

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

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7.7 Trade Union Organization and Collective Bargaining

Workers shall without exception have the right to join or form trade unions of their choice, as well as to engage in collective bargaining. Employers shall not interfere with, hinder, or oppose trade union organization or collective bargaining.

Trade union representatives shall not be subjected to discrimination or hindered in performing their work, and shall have the opportunity to exercise the role of employee representative in the workplace.

If the right to free organization and/or collective bargaining is restricted by law, the Business Partner shall still facilitate and not hinder alternative mechanisms for free and independent organization and negotiation, as far as permitted in the producing country.

7.8 Work Environment Legislation

The Business Partner must comply with applicable work environment legislation in the country where production takes place and/or the service is performed. This includes specifically:

- wage and working time regulations that are sufficient to cover basic needs
- health, environment, and safety
- regular employment conditions, including employment contracts
- statutory insurances and social arrangements.

7.9 Conflict minerals

The Business Partner shall follow applicable guidelines and recommendations from the Responsible Minerals Initiative (RMI) to ensure responsible sourcing of conflict minerals.

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

7.10 Animal welfare

The Business Partner shall take into account animal welfare in its own business and in its supply chain, including following the Animal Welfare Act and the Terrestrial Animal Health Code; Section 7 - Animal Welfare.

7.11 International sanctions, blacklists and countries subject to boycott provisions

The Business Partner shall take necessary precautions to ensure that neither they nor their suppliers are involved in business with parties that may have sanctions, be blacklisted or operate in countries that are blacklisted.

7.12 Conflicts of interest

The Business Partner shall seek to avoid potential conflicts of interest. If such conflict should nevertheless arise, this shall be reported immediately to Bertel O. Steen.

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8 Implementation and administration

8.1 Management System

The Business Partner shall have a management system for quality and environment. The management system shall be designed to ensure that Legislation and the Guidelines are complied with.

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

8.2 Responsibility

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

8.3 Communication of the Guidelines

The Business Partner shall communicate the Guidelines to all employees and its own supply chain, and implement measures to ensure that the Guidelines are complied with.

8.4 Control

Bertel O. Steen or others with authority may conduct control at the Business Partner and any subcontractors or contract assistants. All relevant documentation that is necessary to check whether the Guidelines are followed may be required to be presented, and unlimited access shall be given to all parts of the premises where work is performed under the contract.

8.5 Documentation

We expect the Business Partner to prepare documentation that the Guidelines are complied with.

8.6 Whistleblowing, questions and reporting of concerns

The Business Partner shall have a system for whistleblowing of misconduct, including breaches of the Guidelines, and shall without delay inform Bertel O. Steen in writing of any such reports related to business with Bertel O. Steen. We expect full cooperation with regard to the investigation of such cases.

The Business Partner shall not exercise any form of retaliation against the whistleblower or any person assisting the whistleblower, and shall implement routines that ensure confidentiality and protection of the whistleblower.

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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9 Consequences of breach of the Guidelines

In the event of serious or repeated breaches of the Guidelines, Bertel O. Steen will have the right to terminate the existing contract with the Business Partner and/or terminate the business relationship or other forms of cooperation. Bertel O. Steen may, however, choose to continue the cooperation with the Business Partner with a view to making improvements, including that any restorative measures are implemented as needed. Bertel O. Steen can require that an action plan be presented for when and how the breaches will be rectified.

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