

Hatteland Group's

Code of Conduct & Ethics

for Suppliers and Business Associates

EMP
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ydra

HATTELAND



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1. Introduction

The Hatteland Group comprises the companies Jakob Hatteland Computer AS, EMP Secure AS, Ydra AS and a number of other business entities. In the following, these companies, as well as any other companies that may become part of the Hatteland Group, are jointly termed "the Hatteland Group".

The Hatteland Group has been creating spaces where ideas can grow since 1971. The innovations we have introduced have been practical necessities – down-to-earth solutions to real problems.

A high level of integrity, a desire to create and pride in the work we do, combined with our companies' ethical, transparent and responsible business practices, underpin our corporate culture and provide important guidelines for how we interact with each other and the world around us.

We believe that our success depends on retaining the confidence of our customers, employees and suppliers, and have pledged to maintain high ethical standards in all our dealings and relationships.

We expect all our suppliers and three business partners to share this commitment and operate in accordance with our Supplier Code of Conduct. The guidelines set out in this Supplier Code of Conduct correspond to those the Hatteland Group applies internally

and describe our expectations with respect to human and labour rights, environmental protection, business ethics and compliance with applicable laws and regulations.

We believe that responsible behaviour is not simply the right thing to do, it is also crucial for the establishment and maintenance of long-term and sustainable business relationships. We will hold ourselves and our suppliers accountable for complying with these standards and will implement suitable measures to resolve any violations that may occur.

Thank you for your cooperation and your commitment to operating your business in a responsible and ethical manner.

On behalf of the companies in the Hatteland Group,

Stig Hatteland
CEO



2. Understanding and applying the Code of Conduct & Ethics

2.1 Area of application and scope

This Code of Conduct applies to suppliers and business partners of the Hatteland Group.

The term "suppliers" means businesses that supply products and services that the Hatteland Group purchases in order to operate its business, but may also include other categories, such as agents, distributors and various partners involved in the Hatteland Group's supply chain.

The term "supply chain" means any chain of suppliers and subcontractors which deliver or produce goods, services or other input factors that are included in the Hatteland Group's product and service deliverables.

The term "business partner" means any entity supplying goods or services directly to the Hatteland Group, over which the company has a controlling interest, but which is not part of the supply chain. In the following, "supplier" is used as a collective term for suppliers and business partners.

Each supplier is responsible for ensuring that its business and supply chain comply with the Supplier Code of Conduct in effect at any given time. The term "supplier's business" means the supplier's employees at all levels, board members, contracted personnel, consultants and others acting on behalf of the supplier. Suppliers must inform their subcontractors of this Code of

Conduct and implement measures to verify compliance with the guidelines set out herein. If necessary, the Hatteland Group may require suppliers to obtain statements from its subcontractors confirming that they are complying with the Code's provisions. When requested, suppliers selling products and services to the Hatteland Group must be able to disclose to the Group where the products or services are produced.

2.2 Standards and principles

The Hatteland Group's Supplier Code of Conduct is based on national and international guidelines and conventions, including:

- The Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights (UNGPR)
- The Ten Principles of the UN Global Compact for responsible business, covering the areas of human rights, labour rights and standards, the environment and efforts to combat corruption
- The ILO's conventions on child labour, forced labour, discrimination and freedom of association
- The OECD's Guidelines for Multinational Enterprises
- Applicable laws and regulations

2. Understanding and applying the Code of Conduct & Ethics

2.3 Governance and compliance

Suppliers must identify, manage and comply with the business ethics requirements set out in this Code of Conduct.

This means that suppliers must establish the appropriate policies, procedures, governance systems, quality improvement activities, internal control systems and workforce needed to comply with this Code of Conduct – and communicate clearly what is required in this connection.

The Hatteland Group's suppliers must comply with all applicable laws and regulations in their country of registration, in addition to the laws and regulations prevailing in the countries in which they operate. It is expected that suppliers act in accordance with relevant international conventions and regulations adopted by international organisations, including the UN and the OECD. Where there are discrepancies between prevailing laws, regulations and this Code of Conduct, or the requirements set out in a contract with the supplier, the most stringent requirements apply.

2.4 Inspections and reports

Suppliers must have internal arrangements for reporting and for dealing with reports of rule violations or other concerns. They must inform the Hatteland Group of any concerns or potential rule violations, and offer to cooperate fully in the Hatteland Group's follow-up of such violations.

As part of its supplier follow-up, the Hatteland Group reserves the right to verify its suppliers' compliance with this Code of Conduct throughout the contract's term, by means of audits or inspections conducted at the supplier's premises by itself or via a third party.

Each of the parties shall cover their own costs in connection with such checks.

Suppliers are expected to assist with the performance of follow-up meetings, audits and inspections, including through the presentation of necessary documentation within a reasonable period of time. The Hatteland Group may request this documentation in the form of:

- Statements from suppliers
- Independent third-party verification

2.5 Violation of the Code of Conduct

Should a supplier fail to comply with the Code of Conduct, the Hatteland Group will ask the supplier to rectify the situation and document that it has done so within a specified deadline. Failure to comply with the Supplier Code of Conduct is deemed to be a serious matter that could lead to cancellation of the contract, claims for proportional compensation, disqualification as a supplier and reporting to the relevant authorities.

3. Suppliers' behaviour and business ethics

The Hatteland Group is entitled to demand documentation that the supplier is complying with the requirements and obligations set out in this Code of Conduct at any time during the contractual relationship.

If a supplier discovers any violation of this Code of Conduct, either in its own organisation or in one of its subcontractors, the supplier must notify the Hatteland Group without undue delay.

3.1 Human rights and decent working conditions

Suppliers shall operate such that they safeguard human rights and decent working conditions. The supplier must therefore have written policies, guidelines, staff instructions etc., which describe and confirm the business's tenets and practices. At the very least, this must cover the following:

3.1.1 Ban on child labour

Suppliers must not make use of child labour. The term "child" means any person under the age of 15, under the statutory minimum school-leaving age or under the lawful minimum age of employment in the country concerned. The highest of the above-specified age thresholds shall apply. If suppliers make use of employees under the age of 18, they must be able to document that the employee does not perform work that is dangerous or hazardous to their health, including overtime and night working. Children must not

be involved in work that may be harmful to their education.

3.1.2 Ban on forced labour

Suppliers must not make use of forced labour or any other type of involuntary labour. Suppliers must ensure that the work is performed voluntarily and not under threat. In addition, suppliers must ensure that all employees are free to leave their employer after a suitable and reasonable period of notice.

Employees must not be required to deposit money, identity papers or similar items for the purpose of gaining employment or maintaining the employment relationship.

3.1.3 Fair wages and employment terms

Suppliers must pay their employees in accordance with the statutory national minimum wage provisions in the countries in which they operate. The salary payable must be agreed in writing and transferred to the employee at the agreed time.

Suppliers must ensure that all employees have a written employment contract that describes their employment terms in a language they understand. This agreement must contain whatever information is required under national law and must, at the very least, provide details of the position, workplace, salary, working hours, weekly rest days and statutory holiday entitlement.



3. Suppliers' behaviour and business ethics

3.1.4 Working hours in accordance with national legislation/international conventions

Suppliers must ensure that statutory working hours provisions are complied with and that the employees' working hours are in accordance with national laws or collective agreements. Mandatory overtime must be limited and suppliers must ensure that employees consent to any overtime working.

Suppliers must respect and comply with applicable national legislation, international conventions and collective agreements (if relevant), concerning working hours and break periods, including overtime and holidays, sick leave and parental leave, as well as other applicable provisions covering absence from work. Suppliers must respect their employees' need for restitution and ensure that all employees are entitled to adequate paid holiday, at least corresponding to the minimum provided in national laws/international conventions.

3.1.5 Right to unionise and free collective bargaining

Suppliers must recognise and uphold the right to unionisation and free collective bargaining. Suppliers must respect employees' right to establish or join a trade union or employee organisation.

Employees must be entitled to engage in collective bargaining, without fear of threats or reprisals. Suppliers must not discriminate against the employees' elected representatives or trade union members, who must be allowed to perform their work as representatives in the workplace.

In those cases where freedom of association and collective wage negotiations are restricted by national law, suppliers must facilitate – and not hinder – the development of alternatives to independent trade unions and negotiations.

3.1.6 Ban on discrimination and harassment

Suppliers must strive to create a working environment characterised by equality, diversity and mutual respect. Employees or others involved in the performance of a contract with the Hatteland Group must be selected and treated in a manner that does not discriminate on the grounds of gender, skin colour, religion, age, disability, sexual orientation, citizenship, social or ethnic origins, political persuasion, trade union membership or any other factor.

Suppliers must not accept any form of discrimination or harassment at any of their workplaces. Measures must be established to protect employees from sexually explicit, threatening, offensive or exploitive behaviour, and from discrimination or unfair termination of the employment relationship.

3. Suppliers' behaviour and business ethics

3.2 Reporting of wrongdoing (whistleblowing)

Suppliers are expected to have established reporting procedures that are known to employees and that the employees can use to report their concerns without fear of reprisal. Suppliers must ensure whistleblowers are protected and that any such reports are effectively investigated, clarified and dealt with.

3.3 Occupational health, safety and environment (HSE)

Suppliers must maintain a safe working environment in accordance with prevailing legislation and encourage good practice in the area of health and safety.

Suppliers are expected to establish safety measures to prevent accidents and occupational diseases. This includes ensuring all statutory insurance coverage is contracted for. Work-related accidents must be reported to relevant authorities, investigated and preventive measures implemented.

Suppliers are expected to have written policies, personnel handbooks, statements etc., that cover occupational health and safety and that are made available to all employees and relevant stakeholders.

3.4 Sustainability

Suppliers must recognise and, to the extent possible, focus on the UN's Sustainable Development Goals (SDGs). Suppliers must operate in a sustainable fashion and seek to establish a regular and open dialogue with local communities and other stakeholders on matters relating to sustainability. Suppliers must at all times prioritise sustainable alternatives and, where possible, meet the requirements for universal design.

3.5 Climate and the external environment

Suppliers must comply with all statutory environmental standards and ensure environmental precautions are implemented throughout the production and distribution chain, from raw materials production to the retailer. The environment surrounding the production site must not be exploited or damaged by pollution.

Suppliers are expected to take reasonable steps to monitor and work to minimise any adverse impacts their operations may have on the environment. National and international laws and regulations relating to the environment must be complied with.

3. Suppliers' behaviour and business ethics

3.6 Traceability

Suppliers must have full traceability with respect to those materials, products and services that have been identified as posing a material risk of adversely impacting human and labour rights and the external environment. The assessment of material risks must be performed on the basis of recognised sources, such as the High-Risk List published by the Norwegian Agency for Public and Financial Management (DFØ).

3.7 Quality

Suppliers must have a satisfactory quality assurance system, tailored to the deliverable concerned. They must be able to document that defined quality requirements form an integral part of the business's operations.

3.8 Information security and privacy

Upon request, suppliers must be able to present an established information security policy and describe how this is complied with. At the very least, the information security policy must ensure:

- Confidentiality, which means that no one shall have access to information unless they need it to perform their work.
- Integrity, which means that information and systems must be correct and reliable.
- Accessibility, which means that information and systems must be accessible to authorised users as needed.

Suppliers undertake to keep confidential all information concerning the Hatteland Group, as well as the Group's companies and clients, which they obtain in connection with the performance of their work for the Hatteland Group, and use that information solely for the purposes for which it was disclosed. This applies while the work is in progress and after it has been completed.

Suppliers undertake to return or destroy all information that is sent to them, either when their work for the Hatteland Group comes to an end or whenever the Hatteland Group first asks them to do so.

The dignity, privacy and personal rights of all individuals must be respected.

Suppliers must have procedures and systems in place to ensure that data privacy is protected and that no illegitimate acquisition, use or sharing of data, information or material takes place. Suppliers must process confidential information in an ethically appropriate manner and, at all times, within agreed frameworks and applicable regulations. Actual or suspected non-conformances must always be reported.



3. Suppliers' behaviour and business ethics

3.9 Substance abuse

No one may be under the influence of alcohol, narcotics or other substances while they are engaged in work for the Hatteland Group. Limited quantities of alcohol may be imbibed on special occasions or when local customs indicate that this is appropriate, provided that such consumption is not combined with operation of machinery, driving or any other activity not compatible with the intake of alcohol.

3.10 Ethical business practices

3.10.1 Business integrity

Suppliers are expected to always behave in an ethical, appropriate, fair and professional manner. Suppliers must respect the laws that regulate their business operations and must avoid harming people, the environment or the Hatteland Group's reputation.

3.10.2 Fair competition

It is expected that the Hatteland Group's suppliers set high standards with respect to business ethics and that they compete within the competition rules established in the markets in which they operate.

Suppliers must comply with competition laws and must not cause or participate in any violation of competition laws, for example through illegal price collusion, illegal cooperation

between market players or other types of illegal anti-competitive behaviour.

3.10.3 Sanctions

Suppliers must not do business with countries, groups, organisations or individuals that are subject to sanctions.

3.10.4 Political activity

Suppliers must not support political parties or individual politicians in connection with contracts entered into with the Hatteland Group.

3.10.5 Conflicts of interest

Conflicts of interest must be avoided. Suppliers' business decisions must not be motivated or influenced by personal circumstances or interests. A conflict of interest arises when a supplier's representative attempts to promote their personal interests or the private interests of a friend or relative, while acting in their position as a representative of the supplier concerned. Suppliers must report all situations in which there is a potential or perceived conflict between their personal interests and those of the Hatteland Group.

The guidelines in this Code of Conduct cannot be circumvented by acting through a third party, such as a friend or family member (including the person's spouse, cohabiting partner, children, parents, parents-in-law and siblings).

3. Suppliers' behaviour and business ethics

3.10.6 Travel, gifts, entertainment and hospitality

Suppliers must forbid the offering or receipt of business-related benefits – gifts, hospitality, coverage of expenses or other benefits that may constitute or be perceived as constituting an improper influence. Furthermore, suppliers shall not, directly or indirectly, offer gifts to the Hatteland Group's employees or representatives, or parties closely related to them, unless the gift is of a modest nature and appropriate in relation to time and place. Monetary gifts shall never be given.

Courtesies, such as social events, meals or entertainment, may be offered if a relevant business aspect is involved and the costs are kept at a reasonable level.

Travel expenses incurred by representatives of the Hatteland Group are to be paid by the Hatteland Group.

The cost of any hospitality must be kept within reasonable limits. During contract negotiations, bidding or contract award process, all hospitality, gifts or reimbursement of expenses must be avoided, irrespective of the amounts involved.

3.10.7 Anti-corruption

Suppliers must not tolerate and must actively combat all forms of corruption in both the public and private sectors. Suppliers must not offer, solicit, give, accept or receive bribes or other

improper benefits for commercial or personal profit, either directly or indirectly, for themselves or others.

3.10.8 Money laundering

Suppliers must not participate in any form of money laundering and must ensure that financial transactions are not used to launder money.

3.10.9 False accounting

Suppliers must pledge to operate transparently, verifiably and accurately in everything they do, while also fulfilling their duty of confidentiality. All financial accounting data must be correct, registered and entered into the books in accordance with prevailing laws and regulations.





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