



INNOVATIONS SINCE 1912



SUPPLIER CODE OF CONDUCT

BASIC PRINCIPLES FOR
BEHAVIOUR AND
BUSINESS PRACTICE

BRUNSVOLL
PRECISION IS OUR PASSION

SUPPLIER CODE OF CONDUCT

This Code of Conduct defines the basic requirements placed on Brunvoll's suppliers, contractors, sub-suppliers, subcontractors, consultants and business partners («suppliers») concerning their responsibilities towards their stakeholders and the environment.

Brunvoll reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the Brunvoll Compliance Policy. In such event Brunvoll expects the Supplier to accept such reasonable changes.

1. Legal Compliance

Suppliers must conduct their own business in accordance with all applicable laws of the applicable legal systems.

2. Anti-Corruption and Bribery

Suppliers shall not tolerate, endorse or engage directly or indirectly in any form of corruption or bribery. Suppliers shall not grant, offer or promise anything of value, or any other undue advantage, to a government official or to a representative of any person, entity or organisation in the private sector, in connection with a position, assignment or office. The Supplier shall implement effective systems in order to ensure compliance with all applicable regulations for combating corruption and bribery.

3. Fair Competition, Anti-Trust Laws and Intellectual Property Rights

Suppliers shall act in accordance with applicable national and international competition laws and not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

Suppliers shall respect the intellectual property rights of others.

4. Conflicts of Interest

Suppliers shall avoid all conflicts of interest that may adversely influence Brunvoll's business relationships.

5. Human rights and Working Conditions

Brunvoll is committed to ensuring that its business is performed in a responsible, ethical and environmentally sound manner. Brunvoll is strongly committed to respecting human and labour rights throughout the entire supply chain.

Specifically, Brunvoll is committed to complying with the basic human rights as described in the following human rights covenants and conventions and other conventions for the protection of basic human rights:

- (i) United Nation's Universal Declaration of Human Rights;
- (ii) International Covenant on Economic, Social and Cultural Rights;
- (iii) International Covenant on Civil and Political Rights;
- (iv) International Labour Organization's core conventions and requires its Suppliers to do the same.

5.1 Non-Discrimination and Fair Treatment

Suppliers shall treat everyone with dignity and respect, promote equal opportunities for and treatment of its employees and conduct their activities without discrimination on the basis of race, ethnicity, national or other origin, disability, age, gender, sexual orientation, language, religion or political conviction.

Suppliers shall respect the personal dignity, privacy and rights of each individual.

Suppliers shall refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination.

Suppliers shall prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

5.2 Working Hours and Wages

Suppliers shall provide fair remuneration. Employees must be paid at least the minimum legal wage. Suppliers shall provide employees with benefits that comply with applicable laws and any applicable collective bargaining agreements. Suppliers shall comply with the maximum number of working hours laid down in the applicable laws.

Suppliers shall recognise, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.

5.3 Prohibition of Child Labour and Forced Labour

Suppliers are strictly prohibited from using child labour or forced or involuntary labour of any kind. Suppliers must not employ workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

Suppliers must not engage in or tolerate human trafficking or any form of physical or mental coercion, including threatened restrictions on movement, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage or any other kind of exploitation or abuse.

5.4 Health, Safety and Environment (HSE)

Suppliers shall take responsibility for the health and safety of its employees. Suppliers must comply with all government and regulatory health and safety requirements and specifications.

Suppliers shall work actively for an injury-free and healthy working environment, and to promote an open and proactive health and safety culture.

To comply with the above Suppliers shall as a minimum:

- Plan and act to prevent injuries, accidents and illness, and work systematically to manage tasks through e.g. proper design, administrative controls, preventive maintenance, safe work procedures and relevant training;
- To the best of their ability protect their employees from being harmed from factors outside of their control, such as natural disasters and security threats (protection from security threats must be proportional to the threat itself);
- When necessary, provide employees with the appropriate personal protection equipment;
 - Encourage employees to raise safety issues;
 - Facilitate cooperation on HSE related issues;
 - Effectively track and record the occupational injuries and illnesses and implement corrective action to prevent recurrence.

Suppliers shall have adequate emergency preparedness procedures in place in order to identify and assess potential emergency situations. Emergency plans, fire safety and response procedures shall be implemented in accordance with applicable law.

6. Environmental Protection

Suppliers shall act in accordance with the applicable statutory and international standards regarding environmental protection. Suppliers shall minimise environmental pollution and make continuous improvements in environmental protection. Suppliers shall set up or use a reasonable environmental management system.

Suppliers are expected to report or have a plan in place to report;

- Data on Green House Gas emissions from operations
- Ongoing activities to reduce negative environmental impact

7. Supply Chain

Suppliers shall use reasonable efforts to promote among its suppliers compliance with this Code of Conduct. Suppliers shall comply with the principles of non-discrimination with regard to supplier selection and treatment. Suppliers are expected to share information about the upstream activities, being transparent on where resources are sourced from and what measures are being taken to reduce the risk of negative impacts on environment and people.

8. Conflict Minerals

Suppliers shall take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.

9. Compliance and Sanctions

Suppliers shall act in accordance with applicable sanctions and export regulations and shall seek reciprocal commitments from their partners, and perform Integrity Due Diligence (IDDs) on the Suppliers that are part of Brunvoll's supply chain. Risk based IDDs should be performed in such areas as anti-corruption, sanctions and respect of human and labour rights.

10. Reporting Obligations

Suppliers shall report any suspicion of misconduct or activity in breach with the principles in this Code of Conduct, and shall implement such measures as is necessary to end the non-compliant activity and/or remedy any negative effect of such activity. If the Supplier fails to take such steps, Brunvoll may terminate the business relationship with the Supplier.

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