

Supplier Code of Conduct

At Hagland, we strive to be a reliable and professional partner in everything we do. Whether it is in international or local business activities, we aim to live by the highest ethical standards and trust the companies and people we deal with to do the same. Hagland has zero tolerance for all forms of corruption, modern slavery and child labour and requires commitment to responsible business practices and sustainable development from all of its suppliers. The basis of such commitment is the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

This Supplier Code of Conduct ("SCC") describes the standard of business ethics applicable for all suppliers in their business relationship with Hagland. Suppliers include any legal entity or person that provides products or services requested by Hagland. Suppliers shall ensure that their employees, consultants, agents, suppliers, subcontractors, and other representatives comply with the provisions of this SCC.

Suppliers shall report any alleged or observed breach of the SCC in its business activities related to Hagland. In cases of breaches of the SCC, suppliers shall take the necessary corrective actions in a timely manner at no costs to Hagland.

Suppliers shall provide relevant information and documentation upon the request from Hagland, including information regarding sub-suppliers and supply chain risks, employment conditions, etc. Records of audits undertaken of the suppliers' supply chain shall be available on request. Hagland has the right to perform inspections at the supplier and sub-supplier's premises that are necessary to verify that the SCC is complied with.

Any breach of this SCC by a supplier, or any such representative of the supplier, may result in Hagland terminating business activities and in serious cases civil action.

Hagland will act on non-compliance allegations brought forward appropriately and responsibly to the respective contact at Hagland or through our whistleblowing channel.

1. COMPLIANCE WITH THE LAW

Suppliers shall comply with all applicable local and international laws and regulations. If a requirement of this SCC differs from national laws or regulations the supplier shall comply with whichever is more stringent.

2. BUSINESS ETHICS

2.1 Corruption and bribery

Hagland has a zero-tolerance policy towards corruption and bribery. The supplier shall comply with all applicable laws and regulations regarding corruption, bribery, fraud, and other forms of prohibited business practices. The supplier shall not accept, request, receive or offer any favours, gifts, or hospitality of significant value in order to retain, obtain or gain any form of business advantage. Suppliers shall have auditable procedures and standards in place that prohibit any individuals acting on their behalf from taking part in such activities.

2.2 Money laundering

Suppliers shall adhere to any applicable laws and regulations concerning anti-money laundering and take active measures to prevent their financial transactions from being exploited by others for this purpose.

2.3 Fair business conduct

Suppliers shall conduct business in accordance with antitrust laws and regulations and in a fair and ethical manner, promoting healthy competition.

2.4 Conflict of interest

Suppliers shall avoid any conflict of interest with Hagland. This includes interactions with a Hagland representative that could result in a conflict of interest with the representative's responsibility to act in the best interest of the company. Suppliers

shall provide immediate notification to all affected parties if an actual or potential conflict of interest arises.

2.5 Privacy and confidentiality

Suppliers shall adhere to all applicable data privacy laws and regulations concerning the processing of personal and sensitive data. Suppliers shall implement organisational and technical measures to ensure a level of security reflecting the risks. Furthermore, suppliers shall comply with contract requirements relating to information and confidentiality, and not share confidential or business sensitive information with third parties.

2.6 Compliance with trade regulations

Suppliers shall comply with relevant sanctions regimes (including the US, UN, EU and Norway), export control regulations, and other international trade regulations. Hagland will screen potential and existing suppliers for compliance with all relevant sanctions.

3. HUMAN RIGHTS AND WORKING CONDITIONS

3.1 Protection of human and labour rights

Suppliers are expected to comply with the [ETI Base Code](#). Suppliers shall adhere to all applicable laws, international standards, and other legislation relating to the protection of human rights and labour rights. Suppliers shall have policies and practices in place to minimise human and labour rights infringements.

3.2 Working environment and employment conditions

Suppliers shall foster an inclusive and diverse environment free of any sort of harassment, bullying or discrimination whether indirect, direct, or verbal. Suppliers shall take measures to provide equal opportunities for every employee. Suppliers shall

as a minimum adhere to any applicable laws concerning working conditions and compensation, and all employees must have a clear and understandable employment contract. Suppliers shall have in place appropriate grievance, disciplinary and termination procedures.

3.3 Health and safety

Suppliers shall secure the health, safety and welfare of workers and visitors and protect the public from health and safety risks in adherence with all laws and regulations applicable to its operations. Suppliers shall ensure that their workers understand the safe practices and hazards of their work and provide regular and adequate training.

3.4 Modern slavery, child or forced labour

Suppliers shall not participate in, use, or tolerate the use of child labour, forced labour or human trafficking. Child labour is defined by the International Labour Organisation (ILO) as any engagement or work of any person under the age of 15 or under the age of completion of compulsory schooling, whichever is higher.

Children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety or hinder their education or vocational orientation and training. For seafarers, the Maritime Labour Convention (MLC) defines child labour as engagement or work on board a ship of any person under the age of 16.

3.5 Association and collective bargaining

Suppliers shall respect employees' rights to join unions, organise and bargain collectively.

4. ENVIRONMENT

Suppliers shall take a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility.

Suppliers shall proactively participate in the protection of the environment in relation to their business operations, while complying with applicable laws and regulations, as well as obtaining all necessary environmental approval, permits and registrations.

Suppliers are expected to support Hagland's environmental commitments and implement activities to continuously reduce the environmental impact of their operations.

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