

# **Code of Conduct**

Protector Forsikring ASA

## Introduction

### Terminology

Protector's Code of Conduct applies to all Protector suppliers.

Supplier is defined as any person or organisation that contracts with Protector to supply goods or services. Furthermore, it includes internal and external consultants and sub-contractors ("Supplier").

### Purpose and applicability

Protector and all Protector's employees must follow the Code of Conduct. Protector also requires the same from its suppliers.

Ethics are fundamentally about what actions we consider right and what we ought to do, or not to do, in different situations. Following and acting in line with laws and regulations applicable in the countries where we operate are the obvious minimum requirements and starting point, but there are areas where Protector has higher ambitions.

Protector has a clear aim in terms of ethics; zero ethical breaches. For instance, we do not tolerate any form of inducement, bribery or corruption, as well as actions that limit competition, discrimination, harassment or unnecessary environmental impact.

On the following pages Protector summarises the principles for business ethics that we require our suppliers to accept and comply with. Suppliers are liable for ensuring that their employees, and those of potential sub-contractors engaged in the delivery to Protector, have read, understood and undertaken to comply with the principles of the code.

The supplier shall have a process in place to verify compliance with this Code of Conduct and is liable for following up compliance with its sub-contractors.

The Code of Conduct is an essential part of the agreement between Protector and the Supplier and non-compliance with the Code of Conduct may result in any of the following actions: Asking the

Supplier to audit its own organisation or its supply chain and report on the findings; recommending or requiring corrective action plans; in severe cases - termination of the collaboration with the Supplier.

## Principles

### Laws and ethics

#### Business integrity

Supplier shall not engage in any illegal or unethical behavior. Supplier is expected to uphold standards of fair business practices. Supplier shall endeavor to maintain its own confidential process to enable employees and contractors to report incidents of unethical behaviour.

All Suppliers to Protector must also comply with the principles of the UN's Global Compact, the UN Universal Declaration of Human Rights, the ILO's Declaration of Fundamental Principles and Rights at Work and OECD Anti-Bribery Convention. This document outlines the minimum standards Suppliers must observe even when/if they are more stringent than local legislation.

#### Discrimination

Supplier shall treat employees with dignity and respect and not subject them to demeaning conditions. Supplier shall foster a culture which seeks to promote equal opportunity for all. Supplier shall not tolerate unlawful discrimination. Employees are expected to be evaluated on their ability to perform the job.

#### Harassment

Supplier shall foster a culture that does not tolerate harassment of any kind, including but not limited to sexual harassment, threats of harassment or retaliation for reporting harassment.

#### Child labour

Supplier shall not exploit child labor and shall not employ any workers under the age of 15 or the minimum legal working age, whichever is greater. Employment of workers under the age of 18 should

not interfere with their compulsory education and should not, by the nature of the work or the circumstances in which it is carried out, be likely to harm their health, safety, or morals.

### **Forced Labor**

Supplier shall not use forced or involuntary labor nor demand work/service from an individual under threat or coercion. Work must be conducted based on freely agreed terms. Supplier shall not withhold or destroy, conceal, confiscate or deny access by workers to workers' identity or immigration documents. Supplier shall not require nonprofessional migrant workers to bear any costs or fees associated with their recruitment, travel or migration processing.

### **Wages and Working hours**

Supplier shall meet applicable standards regarding working conditions across its entire workforce, including, without limitation, laws, regulations, and standards relating to the payment of the minimum legal wage or a wage that meets local industry standards, whichever is greater; the observation of legally mandated break and rest periods; and the health and safety of the workers in the workplace.

### **Corruption / bribery / financial crimes**

Supplier shall neither make bribes nor accept them, nor induce or permit any other party to make or receive bribes on its behalf, nor cause other parties to violate any applicable anti-corruption or anti bribery laws.

### **Health and safety**

In addition to meeting minimum legal requirements for working conditions, Supplier is expected to provide a safe, healthy work environment (e.g., clean facilities, properly maintained equipment, sufficiently lighted and ventilated facilities) and take necessary precautions to prevent accidents and injury.

### **The transparency act**

The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

All Protector's suppliers are obligated to comply with the law.

## **Environment**

Suppliers shall endeavour to prevent and continuously decrease any adverse impact the company's operations may have on the environment. Supplier shall attempt to conduct its operations in an environmentally sustainable manner, and will comply with, or exceed, those standards stipulated by laws, regulations and international conventions in terms of reducing emissions to the air, soil and water. Supplier is encouraged to track greenhouse gas emissions and to set greenhouse gas reduction targets.

Supplier's services, products and processes should be designed to utilize energy, natural resources and raw materials efficiently, and to minimize the volume of waste and residual products.

Supplier shall avoid materials and methods that involve risks to the environment when there are other available and suitable alternatives. Supplier is encouraged to develop and use environmentally friendly innovations and practices that reduces negative environmental impacts.

## **Confidential information**

Suppliers are expected to pay particular attention to ensuring that confidential information received from Protector is protected and not disclosed to unauthorized parties. In cases where Supplier's employees encounter confidential information (about Protector or Protector's customers), this information should be protected and should not be disclosed to any unauthorized party. Suppliers' employees may not access, duplicate, reproduce or utilize the information other than what is required in order to deliver agreed services to Protector or Protector's customers.

## Reporting violation

To report questionable behavior or a possible violation of this Code of Conduct, you are encouraged to work with your primary Protector contact in resolving your concern.

## Signature

By signing the supplier confirms that the Code of Conduct and its content has been read, understood and will be complied to during the contract period.

For the supplier:

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DATE

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NAME

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SIGNATURE

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TITLE

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DATE

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NAME

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SIGNATURE

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TITLE