



NORWEGIAN
PROPERTY

Ethical Guidelines for Norwegian Property ASA

Last revised by the board of Norwegian Property ASA on February 2nd, 2023.

Norwegian Property will lead responsible, ethical, and healthy business operations where strict standards are placed on the group's employees and their effect on the environment and society at large. The company emphasizes the importance of acting orderly and ethically in all business-related contexts. Ethical guidelines are norms and rules that apply to all employees, as well as all members of the board of Norwegian Property ASA.

The Company's Reputation

The company's reputation is dependent on the behaviour of its personnel. Employees of Norwegian Property are expected to convey the company's core values by acting and communicating responsibly with colleagues, business partners, investors, and society at large.

Human Rights, Decent Working Conditions, Equality and Anti-Discrimination Work

Norwegian Property will, in all its business operations, promote equality and prevent discrimination without distinction of any kind, such as gender, pregnancy, parental leave, caregiver duties, ethnicity, religion, views on life, disability, sexual orientation, gender identity or gender expression. The company will seek to prevent harassment, sexual harassment, and gender-based violence.

Conflict of Interest and corruption

Norwegian Property expects all its employees to conduct their duties with the best objective judgement in all matters impacting the company. To preserve the independence of judgement and action employees must avoid conflicts of interest, or what may become a conflict of interest, regarding financial or personal gain. The company require all employees to always act with the most significant degree of integrity and to treat everyone they encounter – customers, markets, colleagues, representatives and suppliers – in a just and respectful manner.

Norwegian Property will not countenance corruption, bribes or other conditions that restrict fair competition or provide advantages for the company or its employees.

- Employees may not accept nor give gifts which may influence their own or others' integrity and/or decisions. This also applies to participation in trips or at events but does not include smaller symbolic gestures.
- Employees must not work on behalf of the company with matters where they have personal interests or matters where they may be perceived as such.
- Employees shall seek advice and pursue an open dialogue with their superior if in doubt regarding matters mentioned in the above points.

Anti-money laundering and sanctions

The company must not be involved in transactions or have income from operations where money laundering or terror financing occurs, or where the counterparty or the counterparty's owner is listed on a sanctions list.

Assets

Assets belonging to the company, or its customers must be used solely to benefit the company and the customers respectively. Assets belonging to the company, or its customers may not be used for the employee's own benefit. Employees may not appropriate the property of the company or the customer when their employment ends. This also applies to intangible assets, such as copyrights and intellectual property.

Privacy

All processing of personal data on Norwegian Property shall comply with the privacy regulations in force at any given time. The data shall only be used following the purpose for which it was collected and shall be deleted when it is no longer needed.

Legal obligations

Compliance with legal and statutory obligations shall govern all commercial decisions and actions of all employees. The company require everyone to ensure that they and the company comply with the legal and statutory regulations which apply to their area of work. If necessary legal, statutory, and official issues or actions shall be handled and considered with the aid of external legal expertise.

Whistle-blowing

Norwegian Property wishes that any misconduct or unacceptable circumstances within the company be disclosed so that relevant measures or action to solve or prevent such matters may be applied. The company encourage all employees to give notice when discovering such circumstances. All employees, at all levels of the organisation, shall be confident that it is safe to give notice, and that doing so will not have any personal negative consequences. Notification procedures are described in the company's HSE handbook.