

Supplier guidelines for Norwegian Property ASA

Norwegian Property ASA (NPRO) consist of Norwegian Property and all its owned subsidiaries. Norwegian Property's guidelines for suppliers are based on the group's ethical guidelines and guidelines for Corporate Social responsibility.

1. Purpose

Norwegian Property will conduct a responsible, ethical, and sound business at all levels, with strict standards set for the company's suppliers of goods and services and their impact on the environment and society as a whole. The group has guidelines and principles in the following areas:

- Human rights
- Employee rights and social conditions
- The environment and climate
- Combating corruption

The guidelines are based on the three sustainable pillars: environmental, social, and corporate governance.

2. Principles

These guidelines are prepared to clarify the expectations Norwegian Property has to its suppliers of goods and services, and it is expected that everyone who enters into an agreement on goods and services to Norwegian Property also commits to the following guidelines. If a supplier uses subcontractors to fulfil an agreement, the supplier is responsible for conveying and contributing to the subcontractor's compliance with the guidelines.

Where national laws and regulations concern the same themes as these guidelines, the highest standard applies.

The guidelines shall secure that Norwegian Property and the suppliers we conduct business with safeguard and respect human rights and decent working conditions in connection to the production of goods and delivery of services. Norwegian Property will take into consideration social and environmental standards, as well as other factors when choosing suppliers. The supplier's compliance and demonstrated willingness to work for improvements in relation to the ethical guidelines set out in this document will be included in the assessment of choosing suppliers. The following points will be emphasized, and it is expected that the supplier:

- Comply with the law and established working standards.
- Do not use child labour or in other ways exploit weak parties.
- Do not discriminate.
- Respect and safeguard human rights.
- Prevent damage to the environment as a result of their business.
- Reduce emissions.

3. Guidelines

Suppliers of Norwegian property shall:

- Work to promote internationally recognized human rights and decent working conditions as per:
 - UNs Universal Declaration of Human Rights from 1948
 - UNs International Covenant on Economics, Social and Cultural Rights from 1966
 - UNs International Covenant on Civil and Political Rights from 1966
 - UNs Convention on the Rights of the Child from 1989
 - ILOs Eight Core Declaration on Fundamental Principles and Rights at Work:
 - Nr.29 Forced Labour Convention
 - Nr.87 Freedom of Association and Protection of the Right to Organize Convention
 - Nr.98 Right to Organize and Collective Bargaining Convention
 - Nr.100 Equal Remuneration Convention
 - Nr.105 Abolition of Forced Labour Convention
 - Nr.111 Discrimination (Employment and Occupation) Convention
 - Nr.138 Minimum Age Convention
 - Nr.182 Worst Forms of Child Labour Convention
- Safeguard and promote equality, and prevent any kind of discrimination based on i.e. gender, pregnancy, parental leave, caretaker responsibilities, ethnicity, religion, outlook on life, disability, sexual orientation, gender identity gender expression, and seek to prevent harassment, sexual harassment and gender-based violence. Respect for the individual is fundamental and everyone shall be treated with dignity and respect.
- Observe established standards of working life and comply with all requirements in the relevant legislation.
- Allow all employees to be organized in, or form unions.
- Seek to apply working methods which ensure good working conditions, with high standards of HSE.
- Not use children under the age of 15 as labour, and in case of the employment of youth above the age of fifteen, it should be in a way that does not hinder their education or development opportunities. However, Norwegian Property encourages suppliers to give young professionals work experience and to take on apprentices.
- Ensure that forced labour does not occur and that all employees receive decent wages.
- Seek to prevent unwanted effects on the environment and comply with national and international environmental laws and regulations.
- Prioritize the use of environmentally friendly materials, reuse materials and choose solutions which reduce energy consumption and emissions.
- Not tolerate any form of corruption, bribery or other relations that may prevent free competition. Employees of Norwegian Property have been instructed not to participate in trips or events paid for by the suppliers. Employees of Norwegian Property may not use the company suppliers privately unless it is approved by the employee's manager.
- Use Norwegian Properties assets for their own benefit. You may also not bring the company's assets after ended contract, this also applies to intangible assets, such as copyright and intellectual property.

- Treat all personal data to which you gain access when entering into an agreement in accordance with the privacy regulations in force at all times. The information must only be used for the purpose it was conducted and must be deleted when there is no longer use for them.
- Norwegian Property operates in Norway and complies with Norwegian law and it is expected of our suppliers that they conduct their business operations and activities in accordance with laws enforced in Norway.

4. Routines for suppliers

Good routines and organization are important for the implementation and compliance with ethical guidelines. Norwegian Property, therefore, expects the suppliers to have systems/routines which support the implementation of the guidelines. It is assumed that:

- The supplier appoints a person responsible for the implementation of the guidelines in their own business.
- The supplier makes the guidelines known in all relevant departments of their organization.
- The supplier obtains consent from Norwegian Property before the production of part of the production is outsourced to a subcontractor/contractor where this is not agreed to in advance.
- The supplier must be able to account for the origin of goods ordered by Norwegian Property, where it is produced and that there have been no violations of human rights or decent working conditions in the production. Furthermore, Norwegian Property can demand that the supplier give an account of their work to prevent, mitigate and stop negative effects on human rights and decent working conditions, and reserves the right to be able to use this information to fulfil our obligation to comply with the Transparency Act. This includes answering information requests and giving an account of the company's own due diligence assessment. Sharing of information will comply with the rules of the Transparency Act and the current GDPR regulations.
- The supplier is expected to deliver data on greenhouse gas emissions linked to the production of services, purchased goods and transportation of goods. As a minimum it is expected that the supplier can deliver a list of amount of materials used with associated EPDs where available.
- The supplier must sign up for a Startbank membership when asked by Norwegian Property.
- Suppliers in construction projects are expected to be able to demonstrate the following documentation for all employees associated with the project, and to accept any unannounced visits to the construction site:
 - Copy of HSE card
 - Copy of employment agreements
 - Copy of timetables for work carried out in the given period
 - Copy of pay slips for work carried out in the given period

5. Follow-up of suppliers

The supplier must seek to comply with these ethical guidelines in its own operation, as well as contribute to compliance with its subcontractors. At the request of Norwegian Property, the supplier must be willing to document that this occurs in one or more of the following ways:

- Self-declaration from the supplier and subcontractor
- Follow-up conversations with Norwegian Property
- Control of the working conditions at the production site, carried out by an independent party, Norwegian property or a person authorized by Norwegian property. Norwegian Property reserves the right to carry out notified or unannounced inspections at the relevant production, service, or construction site.
- In the event of an inspection, the supplier is obliged to provide the name and contact details of its subcontractors. Contact information is treated confidentially.

6. Brech of the guidelines

In the event of a breach of the ethical guidelines, Norwegian property will demand that the conditions be improved within a reasonable time. Norwegian Property reserves the right to step out of the agreement in the event of significant breaches of the guidelines or in the event of lack of improvement. The supplier is obliged to inform Norwegian Property of any ethical violations of the guidelines and present a plan of how to work to get in compliance with the guidelines. The plan must be approved by Norwegian Property for the agreement between the parties to continue.

7. Whistleblowing

Norwegian Property wants all unacceptable conditions in the business to come to light so that measures can be taken to cease, mitigate or prevent such conditions. Both the companys employees and the suppliers employees is encouraged to whisleblow if they discover any unacceptable conditions or beaches of the ethical guidelines.

Information can be sent to the following e-mail, info@npro.no.