

Ethical guidelines

Last revised by the board of Norwegian Property ASA on 1. February 2024.

Norwegian Property will conduct a prudent, ethical and sound business at all levels, with strict standards set for the company's employees and their effect on the environment and society as a whole. The company wants to behave in an orderly and ethically acceptable manner in all commercial contexts.

These ethical guidelines specify norms and rules which apply to all employees. They also apply to the directors of Norwegian Property ASA.

The Company's Reputation

The company's reputation depends on the behaviour of its personnel. Employees of Norwegian Property are expected to convey the company's base values by behaving and communicating responsibly to colleagues, business contacts, investors and society in general.

Human rights, Decent Working Conditions, equality, and Anti-Discrimination Work

Norwegian Property expects that all employees in their line of responsibility shall:

- Promote internationally recognised human rights and decent working conditions
- Promote equality and hinder discrimination
- Treat all colleagues and employees of tenants and suppliers with dignity and respect.
- Conduct responsible purchases of goods and services on behalf of the company and it is expected that they choose suppliers that are aligned with the group's guidelines for suppliers.
- Promote and maintain a safe and inclusive working environment for everyone, and prevent discrimination of any kind, i.e. on gender, ethnicity, religion, belief, disability, sexual orientation, gender expression, gender identity, pregnancy, parental leave and 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 requires 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

Employees shall treat all processing of personal data in compliance with the privacy regulations in force at any given time. The information shall only be used in accordance with the purpose for which it was collected, and it shall be deleted when it is no longer needed.

Legal obligations

Compliance with legal and statutory obligations will govern all commercial decisions and actions by every employee. The company requires everyone consciously to ensure that they and the company comply with the legal and statutory regulations which apply to their own work. If necessary, all legal, statutory and official issues or actions must be 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.



NORWEGIAN
PROPERTY

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 personnel handbook and the HSE handbook.