

BEWI ASA

SUPPLIER CODE OF CONDUCT

Protecting people and goods for a better every day

In force as of 29 March 2023 and approved by BEWI's Executive Management

INTRODUCTION

BEWI is committed to becoming circular and to contribute to an inclusive society. To achieve this, we require our business partners to reflect BEWI's values and integrity. The purpose of this code of conduct is to ensure that BEWI's suppliers adhere to high standards of safe working conditions, fair and respectful treatment of employees as well as environmental and ethical practices.

We expect our suppliers to work in accordance with applicable laws and respect the legislation at the place of its production and where services are purchased and/or provided. Where national laws and regulations cover the same subject as BEWI's Supplier Code of Conduct, the highest standard shall apply.

It is the responsibility of BEWI and our partners to protect the environment in which we operate by increased resource efficiency, protection of natural resources and by reducing greenhouse gas emissions in our operations and in our value chains. All business relationships and transactions by companies in BEWIs supply chain shall be conducted with integrity and honesty.

BEWIs Supplier Code of Conduct contains internationally recognised labour- and environment requirements, including the OECD Due Diligence guidelines for responsible business conduct. The supplier shall, in accordance with OECD guidelines, carry out actions to identify, prevent, mitigate and account for how they address actual and potential adverse impacts in their operations, supply chain and subcontractors. If non-compliances occur, BEWI expect corrective actions to be taken within a reasonable timeframe agreed upon between the supplier and BEWI. Identified risks must be improved, BEWI expect full transparency and dialogue in the process.

BEWI has also implemented the OECD Due Diligence guidelines in their own operations according to their annual materiality assessments.

BEWI is committed to respect and comply with:

- International Bill of Rights
- The UN Guiding Principles on Business and Human Rights
- The UN Global Compact 10 principles
- The ILO Conventions
- The OECD Guidelines for Multinational Enterprises
- National laws and regulations

HUMAN RIGHTS AND WORKING CONDITIONS

Working Hours [ILO Convention No. 1 and 14](#)

- Working hours shall not be more than prevailing international standards, weekly working hours shall not be more than 48 hours.
- Workers shall be provided with at least one day off for every seventh day.
- Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e., that the total working week including overtime shall not

exceed 60 hours. Exceptions to this may be accepted when regulated by a collective bargaining agreement or national law.

- Workers shall always receive overtime pay for all hours worked over the normal working hours unless otherwise duly agreed or follows national law.

Wages [International Labour Standards on Wages](#)

- Wages and benefits paid for a standard working week shall as a minimum meet national legal standards or industry benchmark standards, whichever is higher.
- All workers shall be provided with a written contract outlining their wage conditions and method of payments before entering employment.
- Deductions from wages as a disciplinary measure or to discriminate shall not be permitted.

Freedom of Association [ILO Convention No. 87, 98, 135](#) and [154](#)

- Suppliers shall respect the right of workers to associate freely, form and join workers organisations of their own choice and to bargain collectively.
- Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

Health & Safety [International Labour Standard on Occupational Safety and Health](#)

- Suppliers shall have updated workplace risk assessments available at all sites and workplaces.
- Suppliers shall ensure that health and safety related information (e.g., emergency procedures and safety hazards) are made known to the workforce and shall be posted within the facility in a language understood by workforce.
- Suppliers shall ensure workplaces, machinery, equipment, and processes are safe and without risk to health. They are obligated to provide safety training to employees and facilitate protective equipment.
- Suppliers shall be required to ensure that the chemical, physical and biological substances, and agents under their control are without risk to health when the appropriate measures of protection are taken.
- Suppliers shall ensure that all required permits, licenses, inspection, and testing reports are in place, up to date and available as required by law.
- Suppliers shall be required to provide information on measures to deal with emergencies and accidents, including adequate first-aid arrangements.
- Suppliers shall define an alcohol and drug policy with the aim of preventing any incidents/accidents and to preserve employee health.

Child labour and young workers conditions

[UN Convention on the Rights of the Child](#), [ILO Conventions No. 138, 182, 79](#), and [146](#)

BEWI will not allow any form of child labour in their business activities and in the activities of their supply chain:

- The minimum age for workers shall not be less than 15 and comply with the national minimum age for employment, or; the age of completion of compulsory education, whichever of these is higher.
- No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety, or morals, including night work.

Forced labour, modern slavery and human trafficking

[ILO Conventions No. 29 and 105](#) Modern Slavery act

- Suppliers shall not use forced labour such as work or services which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.
- Migrant workers must be treated fairly, and their rights must be respected.
- Workers shall not lodge deposits or identity papers with their employer and be free to leave their employer after reasonable notice.

Non-Discrimination (Diversity and Inclusion) & Harassment

[International Labour Standards on Equality of opportunity and treatment](#)

- Suppliers shall guarantee equal treatment and provide an inclusive working environment for all employees.
- Suppliers shall ensure that there is no distinction, exclusion, restriction, or preference, according to characteristics of an employee.
- Suppliers shall provide a workplace free of harassment, victimization, or discriminatory behavior.

ENVIRONMENT

Responsible production and consumption

- BEWI expects our suppliers to ensure sustainable production and consumption with the aim to source, design, manufacture and distribute products and services in ways that contribute to resource efficiency throughout the value chain.
- Suppliers shall ensure, as a minimum, compliance with all applicable legal requirements.
- Suppliers shall apply risk management techniques to identify and mitigate environmental risks and impacts.
- Suppliers shall consider key suppliers' environmental policies and credentials as part of the process for their evaluation and selection.
- Suppliers shall monitor and report, the environmental impact of the company's operations.
- Suppliers shall strive for continuous environmental improvements through setting and reviewing of objects and targets.

- Suppliers shall respect and document sourcing, extraction and handling of minerals and metals used in the supply chain (in accordance with [OECD DD guideline](#))

BUSINESS ETHICS

Anti-Corruption

- Corruption in any form is not accepted, including money-laundering, bribery, extortion, kickbacks, facilitation payments and improper private or professional benefits to or from customers, agents, contractors, suppliers or employees of any such party or government officials.
- BEWI expect all suppliers to adhere to the principles set out in our Anti-Corruption Policy.

Data Protection

- Suppliers shall comply with all applicable laws and BEWI policies concerning data protection and information security, ensuring that privacy is safeguarded, personal data is protected, and all business information is kept secure. Suppliers must ensure they cascade these principles to their subcontractors and tier suppliers. Suppliers must document adherence to these requirements.

Fair Competition/ Anti-Trust

- Suppliers shall comply with applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing with unfair competition and restraints of trade.
- Suppliers shall not enter into agreements with competitors or engage in other conducts that may unfairly impact competition, including, but not limited to, price fixing, bid rigging or improper market allocations.

Conflicts of Interest

- Suppliers shall reveal actual or potential risk of conflict of interests in connection with BEWI employees or their relatives.

Import/Export Controls and Economic Sanctions

- Suppliers shall comply with applicable restrictions on export and import of goods, equipment, tools, software, services and technology, as well as with all applicable economic sanctions, including but not limited to, any economic or financial sanctions enacted, administered or enforced by any authority of (i) the United States of America, (ii) the United Nations, (iii) the European Union, (iv) the member states of the European Union where any member of the BEWI group is incorporated, (v) the United Kingdom and (vi) any authority, official institution or

agency acting on behalf of any of the above mentioned authorities in connection with any sanctions.

Whistleblower Protection and Non-Retaliation

- If the Suppliers has evidence, doubts, or suspicions of any form of corruption or other criminal or non-compliant conduct by BEWI or any of its Suppliers or any of their respective employees, the Suppliers shall immediately inform BEWI thereof. If the Supplier wish to stay anonymous such information can be provided in accordance with the procedures set out in BEWIs Whistleblowing Guidelines.
- BEWI will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Supplier code of conduct.

Management System

- Suppliers shall appoint an employee responsible for implementing BEWIs Supplier code of conduct in their organization.
- Responsible person shall distribute BEWIs Supplier code of conduct and make it known in all relevant parts of the organization.
- Suppliers shall obtain consent from BEWI before production or parts of production are outsourced to a subcontractor where this has not been agreed in advance.

Compliance with this Code of Conduct

- BEWI reserves the right to verify the Supplier's compliance with BEWI's Supplier code of conduct. The Suppliers undertakes to respond to any questions raised by BEWI in this respect within 14 days in order for BEWI to be able to comply with its requirements under the Norwegian Transparency Act. If BEWI becomes aware of any actions or conditions not in compliance with BEWI's Supplier code of conduct the Suppliers shall take immediate action and conduct relevant further assessments to ensure prompt compliance.
- Consequences for non-compliance according the BEWIs Supplier Code of Conduct, may result in termination of contract.
- The Suppliers authorizes BEWI to disclose any information about the Supplier's operation and compliance with this Supplier code of conduct to ensure compliance with the Norwegian Transparency Act.
- BEWI reserves the right to make pre-announced or unannounced inspections at suppliers' facilities.