Eltera

Code of Conduct for Suppliers

Introduction

Responsible supply chain

At Eltera we are committed to responsible business conduct and to contributing to sustainable value chains. We work actively to prevent and address negative impacts on people, society, and the environment that may arise in connection with our operations. This work includes not only our own activities but also our supply chain and our business relationships. These Supplier Code of Conduct guidelines are based on Eltera's policy on fundamental human rights and decent working conditions and form part of the Group's work on responsible supplier management and due diligence. We expect our suppliers to share this commitment and conduct their business in an ethical and responsible manner. As a minimum, suppliers are expected to comply with applicable laws and relevant industry standards. This includes standards relating to product safety, climate and environment, human rights, health and safety, anti-corruption, and business ethics. Suppliers are expected to work systematically with due diligence processes to identify, prevent, and address risks of negative impacts on human rights, labour conditions, and the environment within their own operations and supply chains. We expect suppliers to support the goals of the Paris Agreement on climate change and to operate in line with key international standards for responsible business conduct, including:

- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- The UN Guiding Principles on Business and Human Rights (UNGP)
- The ILO Core Conventions on labour rights

Scope

These ethical guidelines apply to all suppliers, business partners, collaborators and other third parties that deliver goods or services to Eltera (collectively referred to as "suppliers").

Training and compliance

Suppliers are encouraged to provide internal training on these ethical guidelines. Suppliers are also expected to make the guidelines available to relevant employees and to require similar standards from their own suppliers and subcontractors.

Product safety, climate and environment

Product safety and quality

Eltera expects its suppliers to comply with relevant laws, regulations and industry standards relating to product safety and quality. Products and services delivered to Eltera must meet agreed requirements for quality, safety and documentation. Suppliers are expected to have established quality assurance processes to identify deviations and implement necessary corrective actions.

Climate and environment

All actors in the industry share responsibility for reducing environmental impacts and contributing to sustainable development. Eltera expects suppliers to work systematically to reduce their environmental

footprint and comply with applicable environmental legislation. Suppliers are expected to support international climate and environmental goals, including the objectives of the Paris Agreement, and to work actively to reduce greenhouse gas emissions and other environmental impacts. Suppliers should manage environmental risks through relevant policies and procedures, including measures to:

- manage waste in accordance with environmental legislation
- minimize the use of hazardous chemicals
- develop more circular solutions
- reduce the use of plastic and plastic waste
- improve the efficiency of energy, water and natural resource use
- reduce greenhouse gas emissions and other harmful emissions

Substances of Very High Concern (SVHC) and REACH compliance

Suppliers shall document that products do not contain Substances of Very High Concern (SVHC) under the REACH regulation. Where the use of such substances is permitted, suppliers are expected to evaluate substitution where feasible.

Microplastics and plastic pollution

Suppliers shall comply with applicable EU and EEA regulations relating to microplastics and plastic pollution, including requirements under SCIP and REACH regulations. Measures to reduce fibre release and plastic emissions should be assessed and implemented where relevant.

Air pollution and chemical exposure

Suppliers are expected to limit emissions of dust, VOCs and other harmful substances through appropriate product selection and preventive measures. Where relevant, measures such as ventilation systems, dust control and other health and safety measures should be implemented to reduce exposure.

Social responsibility

Principles for responsible business conduct

The following principles are based on international standards from the United Nations and the International Labour Organization and represent minimum standards for responsible business conduct. The principles are based on, among others:

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The Universal Declaration of Human Rights

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The ILO Core Conventions

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The UN Guiding Principles on Business and Human Rights (UNGP) Suppliers shall comply with applicable national laws and regulations. Where national legislation and these guidelines address the same subject matter, the highest standard shall apply.

1. Forced labour

All forms of forced labour, slave labour or involuntary labour are strictly prohibited.

2. Freedom of association and collective bargaining

Workers shall have the right to organise and participate in collective bargaining.

3. Child labour

Child labour is not permitted. Minimum age requirements must comply with national legislation and relevant ILO conventions.

4. Non-discrimination

Discrimination related to employment, wages, training or termination based on gender, ethnicity, religion, age, disability, sexual orientation or political affiliation is not permitted.

5. Harsh or inhumane treatment

Physical or psychological abuse, harassment or other inhumane treatment of workers is prohibited.

6. Health and safety

The workplace shall be safe and healthy, and workers must receive appropriate training and protective equipment.

7. Wages

Workers shall receive wages in accordance with applicable legislation and industry standards. Wages should be sufficient to meet basic needs.

8. Working hours

Working hours shall comply with national legislation and relevant international standards.

9. Regular employment

Employment relationships shall be based on lawful and regular employment, and workers shall have written employment contracts.

10. Vulnerable groups

Suppliers shall exercise particular due diligence towards vulnerable groups of workers, including migrant workers and other marginalised groups.

11. Environment

Suppliers shall work systematically to reduce environmental impacts from their own operations and supply chains.

12. Corruption

All forms of corruption and bribery are strictly prohibited.

13. Animal welfare

Where the supplier's activities involve animals, they must be treated in accordance with applicable legislation and recognised standards for animal welfare. Suppliers are expected to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGP). Suppliers are expected to conduct due diligence processes in line with the UNGP and the OECD Guidelines for Responsible Business Conduct, and to require the same from their own suppliers. In accordance with the Norwegian Transparency Act, Eltera publishes an annual statement describing our human rights due diligence and responds to requests for information from third parties. Suppliers commit to responding to requests from Eltera regarding how they conduct due diligence within their supply chains, including information concerning material risks or actual breaches of human rights and decent working conditions.

Ethical business conduct

Anti-corruption

Eltera has zero tolerance for corruption and illegal anti-competitive behaviour. Suppliers shall conduct business with integrity and must not offer, give, request or receive any improper advantage. Gifts, hospitality or other benefits must never be intended to improperly influence business decisions. If gifts or hospitality are offered, they must be transparent, modest and in compliance with applicable laws and industry standards.

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Corruption is defined as the abuse of entrusted power for private or corporate gain.

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Suppliers must have internal procedures to prevent corruption and manage conflicts of interest.

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Gifts and hospitality must be of limited value and must never be perceived as an attempt to exert improper influence.

Competition and market behaviour

Eltera supports fair and open competition in all markets. Suppliers shall comply with applicable competition laws and refrain from any unlawful cooperation with competitors. Suppliers shall not participate in practices such as:

- price fixing with competitors
- market or customer allocation
- exchange of sensitive commercial information
- cooperation that restricts innovation or fair competition

Anti-money laundering

Eltera has zero tolerance for money laundering. Suppliers shall conduct business only with funds originating from legitimate and traceable sources. Suppliers shall implement reasonable measures to prevent illegal payments and ensure that financial transactions are not used for money laundering or other unlawful activities.

Sanctions and export control

Suppliers must comply with applicable national and international sanctions and export control regulations. This includes refraining from importing, exporting, re-exporting or transferring goods, services, technology or software in violation of sanctions or export control rules imposed by authorities or international organisations, including Norway, the EU and the United Nations.

Ensuring compliance with the Supplier Code of Conduct

Monitoring and audits

Suppliers may be asked to document how they comply with these guidelines. Eltera reserves the right to conduct audits or other follow-up activities to verify compliance. Such activities may include:

- inspections of facilities or production sites
- review of documentation
- interviews with employees or management
- other relevant follow-up activities

Clarification

If suppliers are uncertain about how these ethical guidelines should be interpreted or what constitutes appropriate conduct, they are encouraged to contact Eltera for guidance. Enquiries may be sent to: apenhet@elteragruppen.no

Breaches

If suppliers discover or suspect breaches of these guidelines, they are expected to notify Eltera as soon as possible. Suppliers shall maintain internal procedures for reporting and addressing concerns or violations. Such matters should be reported without undue delay to: apenhet@elteragruppen.no If Eltera becomes aware of breaches of these guidelines, we will enter into dialogue with the supplier to clarify the situation and assess

necessary corrective actions. Where adverse impacts are identified, suppliers are expected to implement corrective actions and, where relevant, contribute to remediation or compensation for affected parties. Eltera reserves the right to require corrective actions and may terminate the business relationship in cases of serious or repeated violations.

Protection against retaliation

Any person who suspects breaches of these guidelines may report concerns to Eltera. All enquiries will be handled confidentially. Eltera does not tolerate discrimination, sanctions or retaliation against individuals who report concerns in good faith.