

## Code of Conduct for Suppliers

### INTRODUCTION

#### Responsible Supply Chain

At Eltera Gruppen Norge AS (“ElteraGruppen”), we are committed to responsible business conduct and to contributing to sustainable value chains. We seek to prevent and address adverse impacts on people and the environment that may arise in connection with our operations. This commitment applies not only to our own activities, but also to our supply chain and business relationships.

We expect our suppliers to share this commitment and to conduct their business in an ethical manner. As a minimum, suppliers must comply with all applicable laws and industry standards. This includes standards related to product safety, climate and environment, human rights, health and safety, anti-corruption, and business ethics.

All suppliers are expected to support the objectives of the Paris Agreement on climate change and to comply with leading global standards for responsible business conduct, including the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGPs), and the ILO Core Conventions on workers’ rights.

#### Scope of Application

This Code of Conduct applies to all suppliers, business partners, contractors, and other third parties that provide goods or services to ElteraGruppen (collectively referred to as “suppliers”).

#### Training and Compliance

Suppliers are encouraged to provide internal training on this Code of Conduct. Suppliers are also expected to make the Code available to relevant employees and to impose equivalent requirements on their own suppliers.

### PRODUCT SAFETY, CLIMATE AND ENVIRONMENT

#### Product Safety and Quality

Suppliers are expected to comply with applicable laws and regulations on product safety and quality and to deliver products in accordance with agreed standards. Suppliers must have quality assurance processes in place to identify deficiencies and implement corrective actions.

#### Climate and Environment

All actors in the industry have a responsibility to reduce their environmental footprint and work towards zero harm to the environment. Suppliers must comply with applicable environmental legislation and commit to international climate and environmental goals, including net-zero carbon emissions and the protection of air, water, and nature.

Suppliers are expected to manage environmental risks through appropriate policies and procedures. This includes waste management in accordance with applicable regulations, minimizing the use of chemicals, developing circular solutions, reducing plastic use and plastic waste, improving the efficiency of energy, water, and natural resource use, and reducing greenhouse gas emissions and other harmful emissions.

## **Substances of Very High Concern (SVHC) and REACH Compliance**

Suppliers must document that products do not contain SVHC substances in accordance with the REACH Regulation and assess substitution even where such use is permitted.

## **Microplastics and Plastic Pollution**

Applicable EU and EEA regulations (including SCIP and REACH) must be complied with. Measures to prevent fiber shedding shall be assessed and implemented where relevant.

## **Air Pollution and Chemical Exposure**

Suppliers must limit dust, VOCs, and other emissions through product selection and mitigation measures. Ventilation and dust control measures are expected in project-related use.

## **SOCIAL RESPONSIBILITY**

### **Human Rights and Decent Work**

Respect for fundamental human rights and international standards for decent work (ILO Core Conventions) are globally recognized minimum standards applicable to all businesses. These include, but are not limited to:

- The Universal Declaration of Human Rights
- The International Covenant on Economic, Social and Cultural Rights (1966)
- The International Covenant on Civil and Political Rights (1966)
- ILO Conventions No. 29 and 105 (Forced Labour)
- ILO Conventions No. 87 and 98 (Freedom of Association and Collective Bargaining)
- The UN Convention on the Rights of the Child
- ILO Convention No. 138 (Minimum Age)
- ILO Convention No. 182 (Worst Forms of Child Labour)
- ILO Conventions No. 100 and 111 (Equal Remuneration and Non-Discrimination)
- The UN Convention on the Elimination of All Forms of Discrimination Against Women

Suppliers are expected to follow the UNGP and fulfill their responsibility to respect human rights. This includes avoiding adverse impacts on workers and others affected by their operations or business relationships. Suppliers must apply the same standards throughout their supply chain and conduct due diligence in accordance with UNGP and OECD guidelines.

In accordance with the Norwegian Transparency Act, ElteraGruppen publishes an annual due diligence statement and responds to information requests from third parties. Suppliers are required to respond to ElteraGruppen's inquiries regarding due diligence processes, including identified risks or actual violations of human rights and decent working conditions.

## **ETHICAL BUSINESS CONDUCT**

### **Anti-Corruption**

ElteraGruppen has zero tolerance for corruption and unlawful anti-competitive conduct.

Suppliers must not offer or accept gifts or hospitality in violation of applicable laws or standards. Any gifts or hospitality must be transparent, lawful, and never intended or perceived as an attempt to improperly influence business decisions.

Corruption includes the abuse of position for personal gain. Suppliers must have internal procedures to prevent corruption and manage conflicts of interest. Gifts and hospitality must be of nominal value and never constitute improper influence.

### **Competition and Market Conduct**

ElteraGruppen supports fair and open competition. Suppliers must refrain from any unfair competition in violation of applicable laws.

Suppliers must not engage in price-fixing, market sharing, or the exchange of competitively sensitive information. Unlawful cooperation in tenders, consortia, or industry forums is prohibited. Examples of unacceptable conduct include price coordination, market allocation, exchange of future pricing or margins, and strategies that restrict competition or innovation.

### **Anti-Money Laundering**

ElteraGruppen has zero tolerance for money laundering and only conducts business with entities engaged in legitimate activities using funds from lawful and traceable sources. Suppliers must take reasonable measures to prevent, detect, and report any form of money laundering.

### **Sanctions and Export Control**

Suppliers must comply with all applicable national and international sanctions and export control regulations. No goods, services, software, or technology may be transferred in violation of restrictions imposed by Norway, the UN, the EU, or other relevant authorities.

### **ENSURING COMPLIANCE**

Suppliers may be required to document compliance with this Code of Conduct. ElteraGruppen reserves the right to conduct audits or other verification measures, including site inspections, document reviews, and employee interviews.

In case of uncertainty regarding the interpretation of this Code, suppliers should contact:  
**[apenhet@elteragruppen.no](mailto:apenhet@elteragruppen.no)**

Suspected or actual violations must be reported without delay. Suppliers must have internal reporting mechanisms and cooperate fully with ElteraGruppen. Serious or repeated violations, or lack of cooperation, may result in termination of the contractual relationship.

Reports will be handled confidentially. Retaliation against individuals raising concerns in good faith will not be tolerated.

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*Supplier name:*

*Signature:*

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*Date and place:*

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*Name and title (block letters):*

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