



Elis Elektro AS Code of Ethics

The main responsibility for preventing and detecting fraud and errors lies with the management of the company. The management, under the supervision of those who have the overall responsibility for governance and control sets the standard for what is the right attitude, establishing and practicing ethical standards, and implementing appropriate control measures to prevent and detect fraud and Error.

Those who have overall responsibility for management and control of the company ensure, through supervision of management, that the integrity of the company's accounting and economic reporting systems is safeguarded and that satisfactory control measures are in place, Including measures to monitor risk, financial control and compliance with legal requirements.

The company's management is responsible for establishing the control environment and implementing policies and actions to help ensure orderly and efficient business practices as far as possible. This responsibility includes implementing and securing continuous operation of accounting and internal control systems designed to prevent and detect fraud and errors.

Management is responsible for communicating the company's ethical guidelines with employees in the company.

Elis Elektro to respect fundamental requirements for human rights, labour rights, environment and anti-corruption throughout our business. This we want to do in close cooperation and in the dialogue with our suppliers and partners. To clarify what we expect from our suppliers, we developed guidelines for ethical trading. The guidelines cover basic human rights, labour rights, environment and anti-corruption in the supply chain.

Elis Elektro expect that our suppliers communicate these guidelines, or guidelines at least as extensive, to its subcontractors and contributes to their compliance with them, in addition to working to comply with the requirements on their own behalf.

Requirements for your own business

Elis Elektro working continually to improve their own policies and practices, including procurement practices, that can help suppliers follow our policies for ethical trading in dialogue with suppliers and other stakeholders.

Elis Elektro, including all employees, shall never offer or receive unlawful or improper monetary gifts or other allowances to obtain business or private benefits for their own part or benefits for



customers, agents or suppliers. The general manager shall be informed immediately without undue delay

Elis Elektro and **Elis Elektros** suppliers shall avoid partners that operate in countries subject to international boycott by the United Nations and/or Norwegian authorities.

Follow-up of compliance with the requirements

At the instigation of **Elis Elektro** The supplier must be able to document how they themselves and, optionally, subcontractors, work to live Guidelines. It can be done by follow-up calls with **Elis Elektro** and/or surveying the working conditions at the production site. If **Elis Elektro** Want to map Subcontractors in respect of compliance with ethical trade guidelines, the suppliers is obliged to allow such a mapping and provide your name and contact information.

Violation of the Code of ethics Supplier, in cooperation with the **Elis Elektro** Make a plan for the rectification of the shortcomings. Remedy should take place within a reasonable time. The termination of a contract will only occur if the supplier, after a recurring request, does not demonstrate a willingness to correct the conditions.

Our suppliers shall have a well-functioning system for dealing with complaints related to human rights, labour rights, the environment and corruption. The supplier shall ensure that such complaints can be made by workers and external parties such as local communities and civil society organisations.

Requirements for conditions in the supply chain

Our suppliers and contracting partners shall respect basic requirements for human rights, labour rights, environmental and anti-corruption. Goods delivered to Elis Elektro shall be made under conditions consistent with the requirements set out below. The requirements are based on key UN conventions, ILO conventions and national labour legislation at the production site. Where national laws and regulations cover the same subject as these guidelines, the highest standard shall apply.

Guidelines for ethical Trading

1. Forced labour/slave labour (ILO Convention No. 29 and 105)

- 1.1. There shall be no form of forced labour, slave labour or involuntary labor.
- 1.2. Workers shall not be required to provide deposit or identity papers to the employer and shall be free to terminate the employment with reasonable notice of termination.

2. Specialist organisation and Collective bargaining (ILO Convention No. 87, 98, 135 and 154)

- 2.1. Workers shall without exception have the right to join or establish trade unions at their own request and to negotiate collectively. The employer shall not interfere with, hinder or oppose the course of organization or collective negotiations.
- 2.2. Union representatives should not be discriminated against or prevented from performing their union work.
- 2.3. If the right of free organization and/or collective bargaining is limited by law, the employer shall facilitate, and not hinder, alternative mechanisms for free and independent organization and negotiation.

3. Child labour (United Nations Convention on Child Rights, ILO Convention No. 138, 182 and 79, ILO Recommendation No. 146)

- 3.1 The minimum age for workers shall not be less than 15 years and in line with
 - i) National minimum age for employment, or;
 - ii) Minimum age for compulsory education,With the highest age as applicable. If the local minimum age is set to 14 years in accordance with the exception of the ILO Convention 138, this may be accepted.
- 3.2 New recruitment of child workers contrary to the above minimum age shall not take place.
- 3.3 Children under the age of 18 shall not carry out work that is harmful to their health, safety or morality, including night work.
- 3.4 Action plans will be established for the speedy phasing out of child labour that is contrary to the ILO Conventions 138 and 182. The action plans should be documented and communicated to relevant staff and other stakeholders. It will be facilitated for support schemes where children are given the opportunity to education until the child is no longer in school age.

4. Discrimination (ILO Convention No. 100 and 111 and the UN Female Discrimination Convention)

- 4.1. No discrimination should be found in the case of employment, remuneration, training, promotion, termination or retirement based on ethnic affiliation, Throw Age, disability, gender, marital status, sexual orientation, union work, or political affiliation.
- 4.2. It shall be established protection against sexually intrusive, threatening, abusive or exploitative conduct and against discrimination or dismissal on a false basis, e.g. marriage, pregnancy, parental condition or the status of HIV-infected.

5. Brutal Treatment (United Nations Convention on Civil and Political rights, art. 7)

- 5.1. Physical abuse or punishment, or the threat of physical abuse is prohibited. The same is true of sexual or other abuse and other forms of humiliation.

6. Health, Safety and Environment (ILO Convention No. 155 and Recommendation No. 164)

- 6.1. It will be worked to ensure workers a safe and healthy working environment. Hazardous chemicals and other substances should be handled responsibly. Necessary measures should be taken to prevent and minimise accidents and health damage resulting from, or related to, workplace conditions.
- 6.2. Workers should have regular and documented training in health and safety. Health and safety training should be repeated for new hires and repositioned workers.
- 6.3. Workers should have access to clean sanitary facilities and clean drinking water. If applicable, the employer shall also provide access to facilities for safe food storage.
- 6.4. If the employer offers lodging, this should be clean, safe, sufficiently ventilated and with access to clean sanitary facilities and clean drinking water.

7. Salary (ILO Convention No 131)

- 7.1. Wages to workers for a normal work week shall at least be in line with national minimum wage provisions or industry standard, the highest applicable. Wages should always be sufficient to cover basic needs, including some savings.
- 7.2. The payment of wages shall be in writing before the work begins. The agreement should be understandable for the worker.
- 7.3. Deduction in salary as a disciplinary reaction is not allowed.

8. Working time (ILO Convention No. 1 and 14)

- 8.1. Working hours shall be in line with national laws or industry standards, and do not exceed working time in accordance with applicable international conventions. Normal working hours per week should not usually exceed 48 hours.
- 8.2. Workers should have at least one nonworking day per 7 days.
- 8.3. Overtime should be limited and voluntary. The recommended maximum over time is 12 hours per week, i.e. Total working time of 60 hours per week. Exceptions to this may be accepted if regulated by a collective agreement or national law.
- 8.4. Workers must always have overtime during working time over normal working hours (see section 8.1 above), minimum in accordance with applicable laws.

9 regular hiring (ILO Convention No. 95, 158, 175, 177, 181)

- 9.1. Obligations to workers, in line with international conventions, national laws and rules on regular hires, are not to be circumvented through the use of short-term engagements (such as use of contract workers, loose workers, and day workers); Contractors or other work relationships.
- 9.2. All workers are entitled to an employment contract in a language they understand.
- 9.3. Apprentice program should be clearly defined with respect to duration and content.

10. Marginalised population groups (United Nations Convention on Civil and Political rights, art. 1 and 2)

- 10.1. The production and use of natural resources shall not contribute to the destruction of the resource and income bases of marginalised populations, for example by confiscate large land areas, reckless use of water or other natural resources populations are dependent.



11 Environment

- 11.1. Measures to reduce negative effects on health and the environment throughout the value chain will be implemented through minimising emissions, promoting efficient and sustainable resource use, including energy and water and minimising greenhouse gas emissions in production and transport. The local environment at the production site should not be driven by the operation of or damaged by contamination.
- 11.2. National and international environmental legislation and regulations shall be complied with and relevant emission permits are to be obtained.

12 Corruption

- 12.1. All forms of bribery are unacceptable, such as the use of alternative channels to ensure illegitimate private or work-related benefits to customers, agents, contractors, suppliers or their added as well as government officials/females.

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**For Elis Elektro
Geir Arkøy**