

# Code of Conduct

Protector Forsikring ASA

## Scope

This code of conduct sets out the minimum ethical standards Protector expects its suppliers to meet. It is based on ethical guidelines adopted by Protector's board.

## Purpose and applicability

Ethics fundamentally concern what actions we consider right and what we ought to do in different situations. Following and acting in line with laws and regulations applicable in the countries where we operate are the obvious minimum requirements and starting point, but there are areas where Protector has higher ambitions. This document therefore represents Protector's minimum standards, and they shall be adhered to even when they are more stringent than local legislation.

Protector has a clear aim in terms of ethics; zero ethical breaches. For instance, we do not tolerate any form of inducement, bribery, or corruption, as well as actions that limit competition, discrimination, harassment, or unnecessary environmental impact.

On the following pages Protector summarises the principles for business ethics that we require of our suppliers. Suppliers are liable for ensuring that their employees, and those of potential sub-contractors engaged in the delivery to Protector, have read, understood, and comply with said principles.

The code of conduct is an essential part of the agreement between Protector and the supplier and non-compliance with the code of conduct may result in any of the following actions: Asking the supplier to audit its own organisation or its supply chain and report on the findings; recommending or requiring corrective action plans; in severe cases - termination of the collaboration with the supplier.

## Principles

### Laws and ethics

#### Business integrity

The supplier shall not engage in any illegal or unethical behaviour. The supplier is expected to uphold standards of fair business practices and shall endeavour to maintain processes to enable employees and contractors to confidentially report incidents of unethical behaviour.

The supplier must comply with the principles of the UN's Global Compact, the UN Universal Declaration of Human Rights, the ILO's Declaration of Fundamental Principles and Rights at Work and OECD Anti-Bribery Convention.

#### Discrimination

The supplier shall treat co-workers and employees with dignity and respect and not subject them to demeaning conditions. The supplier shall foster a culture which seeks to promote equal opportunity for all. The supplier shall not tolerate unlawful discrimination. Employees shall be evaluated on their ability to perform the job.

#### Harassment

The supplier shall foster a culture that does not tolerate harassment of any kind, including but not limited to sexual harassment, threats of harassment or retaliation for reporting harassment.

#### Child labour

The supplier shall not exploit child labour and shall not employ anyone under the age of 15 or the minimum legal working age, whichever is more stringent. Employment under the age of 18 should not interfere with compulsory education and should not, by the nature of the work or the circumstances in which it is carried out, be likely to harm health, safety, or morals.

#### Forced Labor

The supplier shall not use forced or involuntary labour nor demand work/service from an individual under threat or coercion. Work must be conducted based on freely agreed terms. The supplier shall not withhold or destroy, conceal, confiscate, or deny access to identity or immigration documents. The supplier shall not require nonprofessional migrant workers to bear any costs or fees associated with their recruitment, travel, or migration processing.

## Wages and Working hours

The supplier shall meet applicable standards regarding working conditions across its entire workforce, including, without limitation, laws, regulations, and standards relating to the payment of the minimum legal wage or a wage that meets local industry standards, whichever is greater; the observation of legally mandated break and rest periods; and the health and safety of the workers in the workplace.

## Corruption / bribery / financial crimes

The supplier shall neither make bribes nor accept them, nor induce or permit any other party to make or receive bribes on its behalf, nor cause other parties to violate any applicable anti-corruption or anti-bribery laws.

## Health and safety

In addition to meeting minimum legal requirements for working conditions, this supplier is expected to provide a safe, healthy work environment (e.g., clean facilities, properly maintained equipment, sufficiently lighted and ventilated facilities) and take necessary precautions to prevent accidents and injury.

## Environment

The supplier shall endeavour to prevent and continuously decrease any adverse impact its operations may have on the environment. It shall attempt to conduct its operations in an environmentally sustainable manner, and comply with, or exceed, those standards stipulated by laws, regulations, and international conventions in terms of reducing emissions to the air, soil and water.

Services, products, and processes should be designed to utilize energy, natural resources, and raw materials efficiently, and to minimize the volume of waste and residual products.

The supplier shall avoid materials and methods that involve risks to the environment when there are other suitable alternatives available. The supplier shall prefer products that meet EU's Ecolabel criteria, or similar criteria. The supplier is encouraged to develop and use environmentally friendly innovations and practices that reduces negative environmental impacts, track greenhouse gas emissions, and set greenhouse gas reduction targets.

## Confidential information

The supplier is expected to pay particular attention to ensuring that confidential information received from Protector is protected and not disclosed to unauthorized parties. In cases where the supplier's employees encounter confidential information about Protector or Protector's customers, this information should be protected and should not be disclosed to any unauthorized party. The suppliers' employees may not access, duplicate, reproduce or utilize the information other than what is required to deliver agreed services to Protector or Protector's customers.

## Reporting violation

As a supplier wanting to report questionable behaviour or a possible violation of this Code of Conduct, you are encouraged to work with your primary Protector contact in resolving your concern.

## Supplier's signature

By signing the supplier confirms that the Code of Conduct and its content has been read, understood, and will be complied with during the contract period.

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DATE

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NAME

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SIGNATURE

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TITLE

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DATE

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NAME

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## Version control

Date	Version	Changed by	Description of change	Owner
21.04.2023	1.0	Njål Ottestad	First version	Jarl Haugen, Head of Strategic Procurement
17.04.2024	2.0	Sølve Folkestad Dahl	Minor changes to language	Sølve Folkestad Dahl, Head of Corporate Sustainability