



**VOW ASA Supply Chain
Code of Conduct**

INTRODUCTION

VOW ASA expect compliance with our Code of Conduct for employees, directors, suppliers, and other partners, but recognize that embracing these fundamental principles is a dynamic process rather than a static status and encourage suppliers to support our continuous search to improve.

CODE OF CONDUCT FOR SUPPLIERS

At VOW ASA we are committed to being the first-choice partner for our customers. We have a profound passion for climate change mitigation and the prevention of pollution. Thus, our mission is to maximise environmental sustainability impact.

To build trust and confidence and to show our commitment to Sustainable Development throughout the entire value chain of our operations, including our suppliers, we ask all our suppliers to agree and comply with our Code of Conduct for Suppliers. As a Supplier, you should also ensure that the practices and principles outlined in our Code of Conduct for Suppliers are flowed down throughout your own supply chain.

The Code of Conduct for Suppliers specifies the minimum standards expected of all suppliers to VOW ASA. Within their sphere of influence, VOW ASA also encourage suppliers to apply these minimum standards to their subcontractors and sub-suppliers. Furthermore, we also encourage suppliers to strive to live up to both international and industry best practices.

VOW ASA expects compliance with the Code of Conduct for Suppliers but recognizes that embracing these fundamental principles is a dynamic rather than static process and encourages suppliers to support our mission through a never-ending search to improve.

To demonstrate and communicate work and improvement toward the principles, the supplier is expected to possess necessary internal instruments (e.g., measuring procedures, tools, and indicators).

VOW ASA or a third party assigned by VOW ASA may review or conduct onsite audits to assess the supplier's status and progress towards the principles. VOW ASA employees with supplier relations are to make sure that the Code of Conduct for Suppliers is well known and understood by the suppliers.

1. COMPLIANCE WITH LAWS

You are required to comply with all applicable laws and regulations and with our Code of Conduct for Suppliers, including when our Code sets a higher standard than, but does not conflict with, legal requirements. Customs or local practices never take precedence over legal requirements. If you find that our Code of Conduct for Suppliers conflicts with applicable legal requirements, you should inform the relevant VOW ASA manager.

2. LABOUR AND HUMAN RIGHTS

Suppliers must assure the human rights of employees and treat them with dignity and respect as understood by the international community.

2.1 Anti-discrimination

Suppliers shall not discriminate against any employee based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination. In addition, Suppliers shall not require employees or potential employees to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or necessary for workplace safety.

2.2 Fair Treatment

Suppliers shall commit to a workplace free of harassment and discrimination. Suppliers shall not threaten employees with, or subject them to harsh or inhumane treatment, including but not limited to sexual harassment, mental and physical coercion, and verbal abuse.

2.3 Prevention of Involuntary Labour and Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labour. This includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary, and employees shall be free to leave work or terminate their employment with reasonable notice. Employees must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

2.4 Prevention of Underage Labour

Child labour is strictly prohibited. Suppliers shall only employ workers who are at least 18 years of age or the applicable minimum legal age, whichever is higher. Suppliers shall obtain documentation to legally prove the date of birth for all their employees. A register carrying all such records shall be maintained. This Code of Conduct for Suppliers does not prohibit participation in legitimate workplace apprenticeship programs that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

2.5 Juvenile Employees

Consistent with ILO Minimum Age Convention No. 138, suppliers may employ juveniles who are older than the applicable legal minimum age for employment but are younger than 18 years of age, provided they do not perform work likely to jeopardize their health, safety, or morals.

2.6 Working Hours, Wages and Benefits

Except in emergency or unusual situations, a work week shall be restricted to 60 hours, including overtime, and employees shall take at least one day off every seven days. All overtime shall be voluntary. Under no circumstances shall work weeks exceed the maximum permitted under applicable laws and regulations.

Suppliers shall pay all employees at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers shall not use deductions from wages as a disciplinary measure. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall maintain a transparent and reliable system for records on working hours and wages and pay employees in a timely manner and clearly convey the basis on which employees are being paid. In addition, Suppliers shall provide accident insurance covering medical treatment for work related accidents to all employees.

2.7 Freedom of Association

Suppliers shall respect the right of employees to associate freely with, form, and join employees' organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Suppliers shall protect against acts of interference with the establishment, functioning, or administration of employees' organisations in accordance with applicable laws and regulations.

3. HEALTH AND SAFETY

VOW ASA recognises that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and produce innovative products. Suppliers shall commit to creating safe working conditions and a healthy work environment for all of their employees.

3.1 Occupational Injury Prevention

Physical hazards shall be eliminated where possible. Where physical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls such as physical guards, interlocks, and barriers. Where appropriate engineering controls are not possible, Suppliers shall establish appropriate administrative controls such as safe work procedures. Appropriate personal protective equipment shall, in all cases, be provided within Supplier's facilities. Employees shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

3.2 Prevention of Chemical Exposure

Suppliers shall identify, evaluate, and control worker exposure to hazardous chemical, biological, and physical agents. Suppliers must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls such as closed systems and ventilation. Where appropriate engineering controls are not possible, Suppliers shall establish appropriate administrative controls such as safe work procedures. In all cases, Suppliers shall provide employees with appropriate personal protective equipment.

3.3. Emergency Prevention, Preparedness, and Response

Suppliers shall prevent, identify, and assess emergency situations and events and minimise their impact by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

3.4 Occupational Safety Procedures and Systems

Suppliers shall establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems shall encourage employee reporting, classify, and record injury and illness cases, investigate cases, and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate return of employees to work.

3.5 Ergonomics

Suppliers shall identify, evaluate, control, and reduce employee exposure to physically demanding tasks or environments, including manual material handling, heavy lifting, prolonged standing, highly repetitive or forceful assembly tasks, loud noise, and poor light.

3.6 Housing and Dining

Employees shall be provided with clean toilet facilities, drinkable water, and sanitary food preparation, storage and eating facilities. Dormitories provided to employees by the Suppliers shall be clean and safe and provide adequate emergency entrance, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.

3.7 Health and Safety Communication

To foster a safe work environment, Suppliers shall provide employees with appropriate workplace health and safety information and training, including written health and safety information and warnings, in the primary language of the employees. Suppliers shall post, in the primary language of its employees, Material Safety Data Sheets for any hazardous or toxic substances used in the workplace, and properly train employees who will encounter such substances in the workplace. Records of the training shall be kept including names of participants, dates of the training and an overview of the training content.

3.8 Employee Health and Safety Committees

Suppliers are encouraged to initiate and support employee health and safety committees to enhance ongoing health and safety education and to encourage employee input regarding health and safety issues in the workplace.

4. ENVIRONMENT

At VOW ASA, environmental considerations are an integral part of our business practices. Suppliers shall commit to reducing the environmental impact of their designs, manufacturing processes, and waste emissions.

4.1 Substance of Concern Management and Restrictions

Suppliers shall comply with any applicable laws and regulations such as IMO MPEC.269(68), REACH and RoHS prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers shall identify, manage, and list Substances of

Concern as required by each VOW ASA entity (any presence of such substances shall be reported via prescribed reply form) and comply with applicable labelling laws and regulations for design, manufacturing, recycling, and disposal.

4.2 Waste Management

Suppliers manage and dispose of hazardous and non-hazardous waste generated from operations as required by applicable laws and regulations. VOW ASA encourage the use of environmentally friendly / recyclable packaging.

4.3 Wastewater and Stormwater Management

Suppliers shall monitor, control, and treat wastewater generated from operations before discharge as required by applicable laws and regulations. Suppliers shall take appropriate precautions to prevent contamination of stormwater runoff from their facilities.

4.4 Air Emissions Management

Suppliers shall characterize, monitor, control, and treat air emissions of volatile organic compounds, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations before discharge.

4.5 Ground Contamination

Suppliers shall ensure compliance with applicable laws and regulations regarding ground contamination. Suppliers shall investigate and assess the possible risks of ground contamination, due to previous or ongoing activities on the site.

4.6 Environmental Permits and Reporting

Suppliers must obtain, maintain, and keep current all required environmental permits (for example, discharge monitoring) and registrations and follow the operational and reporting requirements of such permits.

4.7 Pollution Prevention and Resource Reduction

Suppliers must endeavour to reduce or eliminate water consumption, wastewater, solid waste, and air emissions, including energy-related indirect air emissions and substances of concern in articles, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials. VOW ASA recognises that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and produce innovative products. Suppliers shall commit to creating safe working conditions and a healthy work environment for all their employees.

4.8 Energy Efficiency

Suppliers must endeavour to use energy more efficiently and avoid energy waste. VOW ASA encourage setting energy efficiency targets and to monitor power and energy consumption, adopt management practices, switching off equipment not needed, and reducing energy consumption where possible.

Suppliers shall proactively support VOW ASA in developing energy efficient products and solutions. and reducing carbon emissions of our products in the use phase.

Indirect material Suppliers shall proactively offer to VOW ASA their more energy efficient products and solutions to enable VOW ASA to lower its energy consumption and carbon emissions. Energy efficiency will increasingly become a selection criterion alongside quality, price, and time of delivery.

5. ANTI-CORRUPTION AND ETHICS

All employees, directors, suppliers, and other partners (hereinafter "employees and partners") must be committed to with the highest standards of ethical conduct in their interaction and dealings with employees, customers, suppliers, and other partners.

5.1 Anti-Corruption and Business Integrity

All international anti-corruption conventions, and applicable anti-corruption laws and regulations of the **countries** in which they operate, shall be always complied with by the employees, directors, suppliers, and other partners shall not engage in any form of bribery or corruption, including without limitation extortion, embezzlement, or fraud in any form. Employees and partners must uphold fair business standards in advertising, sales, and competition. Employees and partners shall maintain a high ethical standard, above all in accordance with this Code of Conduct for VOW ASA and good business practice. Employees and partners shall avoid conflicts of interest that may compromise their credibility in the VOW ASA Group or other exterior parties' confidence in the VOW ASA Group. An example of such conflicts of interest may be if the partner is a member of an association whose core values are contrary to those of the VOW ASA Group.

5.2 Fair Competition

VOW ASA believes fair competition benefits VOW ASA, our stakeholders and society as it drives efficiency and innovation, which are the basis of a well-functioning market economy. We are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations.

5.3 Sourcing of Minerals

Suppliers shall exercise due diligence and comply with any applicable laws and regulation on the source of minerals, including conflict minerals and source of minerals from the Central African region, contained in its products on its entire supply chain and make their measures available upon request.

5.4 Gifts and Hospitality

Suppliers are expected not to give or receive improper benefits or benefits that may be regarded as improper remuneration to obtain, retain or direct business or to secure any other improper advantage in the supplier's business with VOW ASA. Such improper benefits (bribes, etc.) comprise among other cash, items, pleasure trips, extravagant meals and other similar benefits or services. A benefit must comply with the following requirements:

The benefit must be permitted by local laws, regulations, and policies.

The benefit must have a clear and legitimate business purpose.

It must not be provided in exchange for an improper advantage.

The nature, value and frequency of the benefit must be appropriate to the occasion on which it is given.

The benefit must be provided in a transparent manner.

5.5. Disclosure of Information

Suppliers must accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.

5.6 Whistle-blower Protection and Anonymous Complaints

Suppliers shall provide a complaint mechanism for employees to report workplace complaints and compliance violations in accordance with local laws and regulations. The protection and confidentiality of whistle-blowers shall be ensured, and retaliation shall be prohibited.

5.7 Community Engagement

Suppliers are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

5.8 Data Privacy

Data privacy shall be respected and be handled in accordance with applicable laws and regulations.

5.9 Intellectual Property and Confidentiality

Intellectual property rights shall be respected. Suppliers must safeguard and only make appropriate use of confidential information. The transfer of technology and know-how must be one in a manner that protects intellectual property rights.

6. MANAGEMENT COMMITMENT

Suppliers must adopt or establish a management system designed to ensure compliance with this Code of Conduct for Suppliers and applicable laws and regulations; identify and mitigate related operational risks; and facilitate continuous improvement. ISO 14001, ISO 9001, ISO 18001/45001, ISO 50001, and Audit Scheme (EMAS) may be useful resources. The management commitment should contain the following elements:

A corporate social and environmental responsibility statement affirming the Supplier's commitment to compliance and continuous improvement, to be posted in the primary local language at all the Supplier's worksites.

6.1 Management Accountability and Responsibility

Clearly identified company representatives responsible for ensuring implementation and periodic review of the status of the Supplier's management systems.

- *Risk Assessment and Management* - A process to identify environmental, health and safety, business ethics, labour, human rights, and legal compliance risks associated with their operations; determine the relative significance of each risk; and implement appropriate procedures and controls to mitigate the identified risks.
- *Performance Objectives with Implementation Plans and Measures* - Written standards, performance objectives, targets, and implementation plans, including a periodic assessment of the Supplier's performance against those objectives.
- *Audits and Assessments* - Periodic evaluations in place to ensure that the Supplier, its subcontractors, and its next-tier Suppliers are complying with applicable laws and regulations.

6.2 Documentation and Records

Suppliers shall have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by this Code of Conduct for Suppliers. Suppliers shall obtain, maintain, and keep records to ensure regulatory compliance and conformity to this Code of Conduct for Suppliers, with appropriate confidentiality measures to protect privacy.

6.3 Training and Communication

Suppliers shall have programs in place for training employees to implement their policies and procedures and to fulfil improvement objectives.

Suppliers shall have a process for communicating clear and accurate information about their performance, practices, and expectations to its employees, suppliers, and customers.

6.4 Employee Feedback

Suppliers shall have an ongoing process to obtain feedback on processes and practices to foster continuous improvement.

6.5 Corrective Action Process

Suppliers shall have a process for timely correction of any deviations identified by an internal or external audit, assessment, inspection, investigation, or review.

REFERENCES

VOW ASA consulted the following references in preparing this Code of Conduct for Suppliers:

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labour Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.html

ISO Standards www.iso.org

OECD Guidelines for Multinational Enterprises www.oecd.org

OHSAS 18001

<http://www.ohsas-18001-occupational-health-and-safety.com>

United Nations Convention against Corruption

www.unodc.org/unodc/en/corruption/index.html?ref=menu8

United Nations Global Compact www.unglobalcompact.org

United Nations Universal Declaration of Human Rights www.un.org/Overview/rights