

Code of conduct

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Revision: 01
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1 PURPOSE

- Outline the ethical principles that govern decisions and behavior in Cathwell organisation and by third parties.
- Guide employees and third party representatives to conduct themselves with honesty and integrity in all actions representing Cathwell.

2 REFERENCES

No.	Dwg./doc. no	Title
1	0048	Naturaltelse – arbeidsgivers melding til arbeidstaker
2	0049	Personvernerklæring
3	0271	Privacy statement
4	0020	Supplier assessment

The above listed documents are for Cathwell employees, only.

3 BUSINESS CONDUCT

Work environment

Employees must act with integrity, comply with laws, maintain a professional work environment and comply with company policies and regulations. They shall treat customers, colleagues, and partners ethically at all times.

Anti-bribery and corruption

Our integrity is essential for maintaining trustworthiness and reputation. Employees must always do their work fairly, honestly and legally.

Gifts, hospitality and expenses

Gifts and favours may only be offered provided that they are modest, both with respect to value (less than NOK 270) and frequency, and that the time and place are appropriate. We will not offer or accept gifts or favours in any monetary or personal beneficial way. Gifts and favours may under no circumstances be offered or received under or in connection with contract bidding, evaluation or award.

Protection of company assets

Employees must always act to protect company assets, including physical, intellectual, and electronic or digital properties

Substance abuse

The manufacture, distribution, possession, sale or purchase of controlled substances of abuse on company property is prohibited. Being under the influence of illegal drugs, alcohol or substances of

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abuse on company property is prohibited. Working while under the influence of prescription drugs that impair performance is prohibited.

Environment and green initiatives

We recognize that environmental responsibility is essential to providing world-class products and services. Cathwell shall comply with the letter and spirit of applicable environmental laws and regulations. We shall conduct our activities in an environmentally responsible manner.

Conflict of interest

A conflict of interest at work arises when a situation that benefits an employee that also affects Cathwell. Employees are bound to always act in the best interest of Cathwell when representing the company. Employees should avoid situations with actual, potential or perceived conflict of interest.

Refusal of service

While we will make every effort to work with and for clients, failure to respect the code of conduct may result in suspension or refusal to serve.

4 WORK ENVIRONMENT AND PERSONAL CONDUCT

Be inclusive

We welcome and support people of all backgrounds and identities. This includes, but is not limited to members of any sexual orientation, gender identity and expression, ethnicity, culture, national origin, social and economic class, educational level, color, immigration status, sex, age, size, family status, political belief, religion, and mental and physical ability.

Be considerate

We all depend on each other to produce the best work we can as a company. Your decisions will affect clients and colleagues, and you should take those consequences into account when making decisions.

Make differences into strengths

We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Do not forget that we all make mistakes, and that blaming each other does not get us anywhere. Instead, focus on resolving issues and learning from mistakes.

Choose our words carefully

Be kind to others. Do not insult or put down others. Harassment and exclusionary behavior are not acceptable. This includes, but is not limited to:

- Threats of violence.
- Discriminatory jokes and language.
- Sharing sexually explicit or violent material via electronic devices or other means.
- Personal insults, especially those using racist or sexist terms.
- Unwelcome sexual attention.

5 THIRD PARTY BUSINESS CONDUCT

Expectation of conduct

Cathwell expects third parties to implement policies, procedures and training to comply with the following:

- **Conflict of interest and sensitive situations:** If a third party becomes aware of an actual or potential conflict of interest or a sensitive situation that cast doubt on Cathwell's or the third party's ability to act with objectivity when providing services for or in connection with Cathwell's business, it shall notify Cathwell on a timely basis.
- **Corruption and bribery:** Third parties shall not engage in any activities or improper payments that may imply involvement in corruption or bribery when working for or with Cathwell.
- **Health and safety:** The health and safety of our people are of primary importance to Cathwell. Our third parties must provide a safe and healthy work environment for all employees and personnel attending their sites by maintaining a focus on health and safety and complying with all applicable laws, rules and regulations.
- **Child labor:** Third parties must not engage in, or benefit from, the use of child labor in any form. Child labor is defined as employing persons below the minimum age for employment in accordance with applicable national laws.
- **Forced labor and human trafficking:** Third parties must not participate in, or benefit from, any form of forced labor, including bonded labor, forced prison labor, slavery, involuntary servitude, or human trafficking. Third party associates involved in Cathwell's engagements must have the freedom of movement during their employment.
- **Human rights:** Third parties must treat Cathwell's employees and hired labour equally and fairly. Third parties will not accept any form of harassment or discrimination on grounds of ethnicity, color, sex, religion, political views, disability, national or social origin.
- **Law and regulations:** To the extent any applicable law or regulation is more restrictive than this code, such law or regulation shall govern.

Compliance monitoring

Cathwell is committed to monitoring compliance against its standards, policies and codes. Where appropriate, Cathwell will conduct risk-based due diligence on third parties as part of assessing their relationship. Cathwell expects third parties to provide complete and accurate information to facilitate due diligence efforts undertaken by Cathwell, where requested.

If Cathwell determines that a third party has breached this code, it may require the third party to implement a remediation plan, or, in certain circumstances, it may suspend or terminate the relationship with the third party.