

## FIBERPROFF AS CODE OF CONDUCT

### 1. General information

- 1.1. Fiberproff AS (hereinafter - the Company) Code of Conduct (hereinafter - the Code) establishes the principles of activity and behavior, norms of professional ethics.
- 1.2. The Code of Conduct is applicable to all employees and individuals representing Fiberproff AS. We anticipate our vendors, suppliers, contractors, and other business associates to embrace and maintain the same elevated ethical principles that we adhere to.

### 2. Human and labour rights

- 2.1. We respect the human and labor rights of our colleagues, and the employees of our business partners. We do business in a fair and non-discriminating way.
- 2.2. We offer employees equal opportunities for employment, pay, benefits, training and career regardless of their race, color, age, sex, sexual orientation, pregnancy, language, disability, religion, political or other opinion, or social origin.
- 2.3. We recognize and respect the right of employees to freely establish or join trade unions or representative organizations in accordance with national laws and regulations.
- 2.4. We do not employ or use any form of forced, bonded or compulsory labour, and strictly prohibit any form of slavery or human trafficking.
- 2.5. All work is voluntary, and employees are free to leave their employment upon giving reasonable notice.
- 2.6. We do not employ or use child labour. A child means any person under 15 years of age, unless national laws and regulations stipulate a higher mandatory school leaving or minimum working age.

2.7. All our employees are treated with respect and dignity. We don't allow any form of mental or sexual harassment, discriminatory actions, language, or any sexual, coercive, threatening, abusive, or exploitative behavior.

### 3. Working conditions

3.1. We comply with Norwegian national laws and regulations. Every employee receives a written job offer and contract that they voluntarily sign before starting work. Those documents explain the terms and conditions of employment in a language the employee can understand.

3.2. We provide a fair and reasonable salary that meets both the law and our internal pay system. The average salary in the company is above the legal standard for our industry. We don't use salary deductions as a form of punishment.

3.3. We keep track that working hours do not exceed the maximum set by national laws and regulations. All employees have the right to at least one day off following every six consecutive working days.

### 4. Training and Development opportunities

4.1. New employees on day one participates in a formal onboarding program which include brief introduction about the history of the Company, policy, values, priorities, Code of Conduct, etc.

4.2. Employees are encouraged to learn to perform different type of tasks and acquire additional qualifications based on the internal procedure "Management of organizational knowledge and qualification".

4.3. We regularly provide employees with the feedback about their performance, reviewing expectations of their position. The evaluation includes the employee's competencies, job duties, and the manager together with employee openly discuss the goals of the Company and individual goals for employee. This is also an opportunity for the employee to provide feedback to their manager and voice any questions or concerns.

## 5. Health and Safety

- 5.1. We promote the good health of employees and provide and maintain a safe and secure working environment in accordance with applicable laws and regulations.
- 5.2. We regularly carry out the risks assessment of environment and workplace conditions and take the necessary precautionary measures to prevent accidents, occupational diseases and emergency situations.
- 5.3. We provide necessary training to ensure employees are adequately educated on health and safety issues. All employees are equipped with work clothes, shoes and personal protective equipment.
- 5.4. We provide clean, safe accommodation for employees which meets the basic needs.

## 6. Climate and Environment

- 6.1. We working in environmentally friendly way and committed to minimize use of resources including energy, water and raw materials. We consider climate and environmental impact when purchasing products and services. We support sustainable waste management including making reasonable efforts to minimize our waste. We report incidents which are harming climate and environment, analyze and implement preventive measures.

## 7. Privacy and data protection

- 7.1. We guarantee the protection of employe's and client's data by security measures described in internal order "Ensuring Employee and Customer data protection". Access to data is given only to the employees whose work tasks requires it, according to the job title and duties.
- 7.2. If you notice any data protection inconsistencies or if there are any uncertainties, please contact CEO by e-mail [tatiana@fiberproff.no](mailto:tatiana@fiberproff.no)

## 8. Corruption, Bribery and Gifts

- 8.1. We strictly comply with applicable laws and regulations concerning bribery, corruption and fraud. We have zero tolerance for corruption. We do not offer, give, ask for, accept or receive any form of bribe, facilitation payment or undue or improper advantage, favor or incentive to/from any public official, international organization, or any other third party (either in private and public sector, whether directly or through an intermediary).
- 8.2. We do not, directly or indirectly, offer or give any gifts or hospitality to any third party, including public officials, in order to obtain or retain business. Hospitality, expenses or gifts are not offered or given in situations of contract negotiation, bidding or award. Hospitality, such as social events, meals or entertainments may be offered if there is a legitimate business purpose involved, and the cost is kept within reasonable limits.

## 9. Competition

- 9.1. We always meet competitors in an honest and professional manner, and do not cause or are part of any breach of applicable competition laws and regulations.

## 10. Conflict of Interests

- 10.1. We require all employees to act in a fair, honest and professional manner and in accordance with the best of our Company's interest. Conflict of interests may take many different forms that include, but not limited to:
- employee's ability to use their position with the Company to their personal advantage;
  - employee's engaging in activities that will bring direct or indirect profit to a competitor;
  - employee's owning shares of a competitor's stock;
  - employees using connections obtained through the Company for their own private purposes;
  - employees using Company equipment or means to support an external business;
  - employees acting in ways that may compromise the Company's legality (e.g. taking bribes or bribing representatives of legal authorities).
- 10.2. The possibility that a conflict of interests may occur can be addressed and resolved before any actual damage is done. Therefore, when an employee understands or suspects that a conflict of interests exists, they should bring this matter to the attention of management so corrective actions may be taken.

10.3. All conflicts of interests must be resolved as fairly as possible. Management of the Company has the responsibility of the final decision when a solution cannot be found.

10.4. In general, employees are advised to refrain from letting personal and/or financial interests and external activities come into opposition with the Company's fundamental interests.

## 11. Final provisions

11.1. From the employees of Fiberproff AS and everyone who acts on behalf of the Company, we expect that:

- you behave honestly, are trustworthy and set a good example;
- make sure that your behavior complies with the Code of Conduct, policy and rules of the Company;
- use the resources of our Company in the best interest of the Company, and do not misuse these resources;
- not pay or accept bribes;
- make a clear distinction between the interests of our Company and your private interests and avoid possible conflicts of interest;
- ensure that you comply with national legislation;
- timely report incidents, risks and issues which deviates from our policies;
- cooperate fully and transparently in all compliance investigations;
- avoid any practices that may be unlawful, unethical or harm Fiberproff AS reputation;
- ask questions when you are in doubt and raise concerns without concern of retaliation as described in "Procedure for internal notifications".

11.2. If you become aware or suspect that the Company's policies and provisions of Code of Conduct may have been violated, please contact your direct manager or email to [post@fiberproff.no](mailto:post@fiberproff.no)

11.3. This document is an integral part of an employment contract. The person who fails to observe Code of Conduct may be dismissed from work.