

Code of Conduct

Introduction

At Fritzøe Engros AS, we promote decent working and environmental standards in our supply chains. We cooperate closely with our suppliers and business partners in pursuit of this aim. Accordingly, we have prepared this code of conduct to illustrate what we expect of our suppliers and business partners. The code of conduct covers fundamental requirements for human rights, workers' rights, the environment and anti-corruption in our supply chains.

Fritzøe Engros AS advises our suppliers to communicate the requirements of this code of conduct to their sub-suppliers and work towards their compliance with the requirements, in addition to their own efforts to be compliant.

Requirements relating to own practice

Fritzøe Engros AS will continuously work to improve our own policies and practices, including our purchasing practices, to support our suppliers in complying with our code of conduct. We will do this in dialogue with our suppliers and other stakeholders.

Neither Fritzøe Engros AS nor any of its employees shall ever offer or accept illegal or unlawful monetary gifts, or any other form of remuneration, in order to secure a business related or private benefit.

Fritzøe Engros AS shall avoid partners that operate in countries subject to international boycott by the United Nations or Norwegian Authorities.

Monitoring suppliers' compliance with the requirements

The supplier shall be able to document their efforts to secure compliance with the code of conduct, and those of their sub-suppliers, at Fritzøe Engros AS's request. Such documentation may take the form of follow-up meetings, inspections or other means of mapping the working conditions at production sites. The supplier shall be obliged to provide the name and contact information for any sub-supplier that Fritzøe Engros AS requests in order to map compliance with the requirements.

In the event of a breach of the code of conduct, Fritzøe Engros AS and the supplier will jointly prepare a contingency plan for remedying the breach. Remediation shall take place within a reasonable period of time, as mutually agreed. The business relationship will only be terminated if the supplier shows unwillingness to remedy the breach following repeated enquiries.

Requirements to Supply Chain Conditions

The Ethical Trade Principles are founded on key UN and International Labour Organization conventions and documents. National laws shall be respected, and where the provisions of law and our ethical trade principles address the same subject, the most stringent shall apply.

1. Forced and compulsory labour

- 1.1. There shall be no forced, bonded or involuntary prison labour.
- 1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Child Labour

- 2.1. The minimum age for workers shall not be less than 15 and comply with
 - i) the national minimum age for employment, or;
 - ii) the age of completion of compulsory education,whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.
- 2.2. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- 2.3. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.
- 2.4. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

3. Discrimination

- 3.1. There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4. Harsh or Inhumane Treatment

- 4.1. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

5. Health and Safety

- 5.1. The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 5.2. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6. Wages

6.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards.

7. Working Hours

7.1. Working hours shall comply with national laws and benchmark industry standards.

8. Marginalized Populations

8.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

9. Environment

9.1. Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport.

9.2. National and international environmental legislation and regulations shall be respected

10. Corruption

10.1. Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.