



2026 / 1.0

Supplier Code of Conduct

Hallgruppen Supplier Code of Conduct

Introduction	3
Policy for Responsible Business Conduct	4
Purpose	4
General obligations	4
Scope	5
Continuous Improvement	5
Management, Monitoring and Evaluation	6
Visit, inspections and audits	6
Breach of Code of Conduct	6
Supplier Code of Conduct	7
1. Compliance with the law	7
2. Fair business conduct and fair competition	7
3. Anti-corruption, AML, bribery, gifts and hospitality	8
4. Sanctions and trade control	9
5. Freedom of association and the right to collective bargaining	9
6. Forced or Compulsory Labour	10
7. Child Labour	10
8. Discrimination	10
9. Wages, Working Hours and other Conditions of Work	11
10. Health and Safety	13
11. Harassment, Harsh or Inhumane Treatment	14
12. Environment	14
13. Chemical and Hazardous Materials	15
14. Wastewater and Solid Waste	15
15. Air emission	15
16. Waste, Resources Disposal and Recycling	15
17. Whistleblowing	16
Signing	17



Introduction

Hallgruppen AS and its subsidiaries (hereinafter referred to as Hallgruppen) recognise our responsibility as a reliable and responsible partner. We work in accordance with the due diligence approach, in line with international frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

We are committed to responsible business practices, sustainability, respect for human rights, decent working conditions, international

humanitarian law, as well as preventing environmental damage and preventing corruption.

Hallgruppen supports the UN Global Compact. This reflects our long-term focus on sustainability, regulatory compliance and social responsibility.

Aina-Lena Pohl
Sustainability Manager
Hallgruppen AS

Lars Dalgaard
CEO
Hallgruppen AS

2026.01.05

Resources and references:

International Labour Organization

OECD Due Diligence Guidance for Responsible Business Conduct

The Universal Declaration of Human Rights (UDHR)

United Nations Convention on the Rights of the Child

UN Global Compact

Last approved by CEO: January 2026

Policy for Responsible Business Conduct

Purpose

The purpose of this document is to clarify the ethical, environmental and social standards that the Hallgruppen expects its suppliers to adhere to.

It serves as a management tool for responsible supply chain management and is used to ensure that goods and services are produced in a manner consistent with our values, national laws and internationally recognised frameworks such as OECD, UNGP and ILO standards. This helps us maintain the trust of our customers, stakeholders and society at large.

General obligations

Hallgruppen expects our suppliers and business partners to work purposefully and systematically to comply with our Policy for responsible business conduct and Supplier

Code of Conduct (hereafter referred to as Code of Conduct), which covers basic topics such as human rights, labour rights, anti-corruption and the environment.

These ethical guidelines are based on UN Global Compact Principles, UN and ILO conventions, and specify our minimum standard requirements in the markets with which Hallgruppen and its subsidiaries operate. When national laws and regulations deal with the same topics as these guidelines, the strictest requirements shall apply.

It is not an exhaustive list, and more detailed rules may apply to certain businesses or markets.



Scope

Hallgruppen expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities, and sub-suppliers. We expect suppliers to ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any sub-suppliers, and that it is done in the local language and in a manner that is understood by all.

Continuous Improvement

Hallgruppen strives for lasting supplier relationships with suppliers that demonstrate a special willingness and ability to create a positive development in the supply chain. Points as set forth in this Code of Conduct provide the minimum standards expected of suppliers to Hallgruppen.

Hallgruppen expects suppliers to strive to exceed both international and industry best practices, and to work with their own suppliers. Some of the standards established is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.



Management, Monitoring and Evaluation

Hallgruppen expects suppliers to work towards implementing or maintaining a management system. The system must contain information, objectives and necessary guidelines for the organization. Certification in accordance with ISO 9001, ISO 14001, ISO 45001, EMAS, SA8000 or equivalent is considered advantageous. This is to ensure that the organization can meet its objectives, comply with laws and regulations, and support the content of our Supplier Code of Conduct.

The management of companies, being a supplier or business partner to Hallgruppen, is responsible for implementing the required measures in their own organization, including sub-suppliers, to enable compliance with these regulations, and adequate action against any violation. Hallgruppen expects its suppliers to, at a minimum, set clear goals aimed at complying with the standards outlined in this Code of Conduct. At Hallgruppen's request, the supplier/partner shall be able to document how they and potential subcontractors work to comply with the guidelines.

Visit, inspections and audits

Hallgruppen reserves the right to make announced and semi-announced visits to the supplier who produces goods or otherwise cooperate with Hallgruppen. We also reserve the right to appoint independent third parties (such as non-governmental organizations or consulting firms) to carry out inspections to ensure compliance. This may include but is not limited to quality assurance audits and social compliance audits, covering aspects of child labour, forced labour, working hours, health and safety, legal and licenses, environmental system and in-factory quality control among others. All our suppliers are obliged to cooperate on such inspections and to provide Hallgruppen, or the designated independent third party, with all requested information and documentation in that regard.

Breach of Code of Conduct

We do not tolerate the following from our suppliers or partners:

- ✓ **Providing false information, either verbally or in writing.**
- ✓ **Offering or accepting bribes or participating in any form of corruption.**
- ✓ **Failing to correct deviations or implement corrective actions within the agreed time frame without a valid reason.**
- ✓ **Demonstrating any disregard for Hallgruppen's Code of Conduct.**

If a supplier, business partner, or sub-supplier is found to be in violation of these requirements, they must immediately notify Hallgruppen. Breaching these regulations may result in termination of the business relationship with Hallgruppen and/or the exclusion of the supplier's personnel from future deliveries to Hallgruppen.

In cases where the breach also constitutes a legal violation, has caused violations to human rights, breach of wage and working conditions, economic damage, or other serious consequences, further actions such as legal proceedings or reporting to authorities may follow. The supplier will be held responsible for any negative impact or damage caused, and it is the supplier's responsibility to recover and remedy the harm done.

Supplier Code of Conduct

As a supplier or business partner of Hallgruppen, we commit to this Code of Conduct:

1

Compliance with the law

We comply with the laws and regulations of the countries in which we operate. We will act in an ethical, sustainable, and socially responsible manner. We support and respect internationally recognized labour rights and the protection of internationally proclaimed human rights, and to ensure that we are not complicit in human rights abuses.

We understand and adhere to the standards of business conduct relevant to our assignment, profession, and position. We will not be prompted by any misguided sense of loyalty or desire for personal gain to violate applicable laws, our governing elements, policies, or policy descriptions.

**We will act
in an ethical,
sustainable,
and socially
responsible
manner.**

2

Fair business conduct and fair competition

We conduct our business in a fair and ethical manner, promoting healthy competition and protecting the interests of our customers and other stakeholders.

We shall refrain from entering into agreements that may restrict competition, such as price-fixing arrangements, bid-rigging, or market allocation. We shall not disclose commercially sensitive information.

**We conduct
business
ethically and
promote fair
competition.**

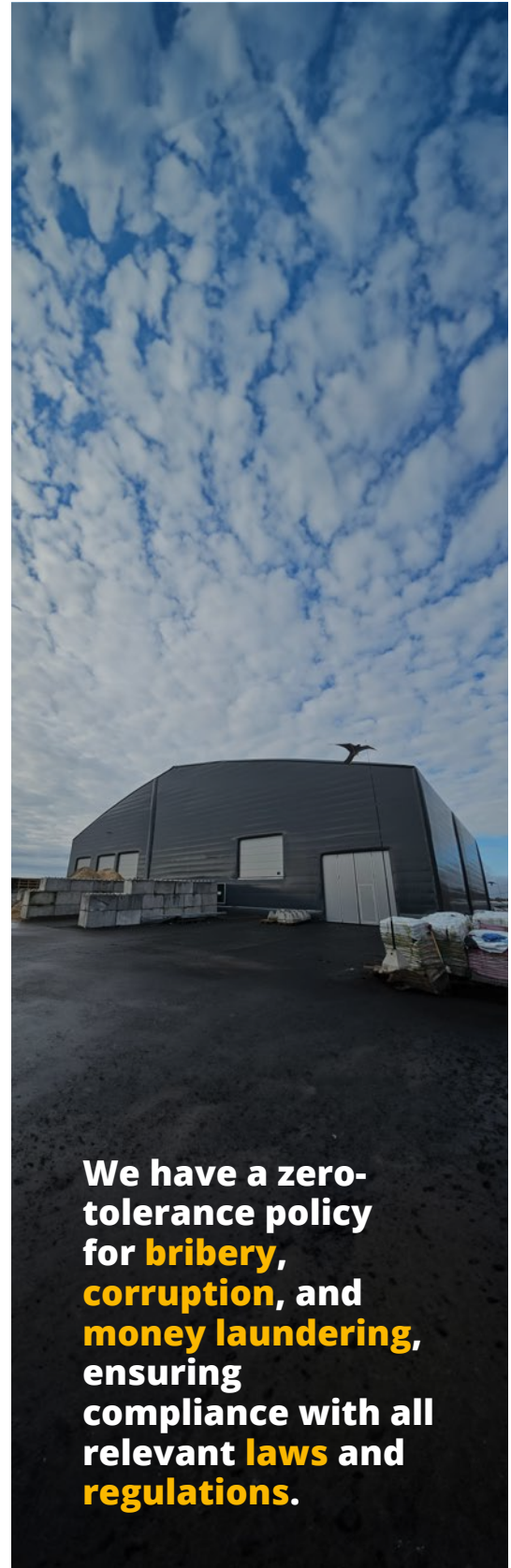
3

Anti-corruption, AML, bribery, gifts and hospitality

We have a zero-tolerance policy towards bribery and corruption, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials, to gain business advantages to which we would otherwise not be entitled.

Bribery and corruption are illegal worldwide. We shall comply with all applicable anti-corruption laws, regulations, and take active steps to ensure that corruption does not arise in connection with business activities. We shall also establish and follow a policy against bribery/corruption in all its activities.

We shall never act in a way that complicit or implicit contributes to money laundering or terrorist financing, and we shall follow all applicable legislation in that respect. We shall always be attentive to unusual payments, invoicing and banking arrangements as well as unusual tax status of business partners, suppliers, customers, etc. We shall be aware of who our counterparties are, and whether there is anything unusual in this respect.



We have a zero-tolerance policy for bribery, corruption, and money laundering, ensuring compliance with all relevant laws and regulations.

4

Sanctions and trade control

We will comply with all relevant sanctions and trade control legislation, including, but not limited to, consolidated sanctions lists from the United Nations Security Council (UNSC). Neither we, our partners, subcontractors or suppliers will engage in business with entities, individuals or companies that are subject to sanctions or trade restrictions, or that are controlled by them. This includes providing any assets or resources. For countries or regions with strict sanctions, we will proceed with caution. We will also ensure we do not import or export goods, technology, or services in violation of these sanctions and laws.

We will follow all relevant sanctions and trade control laws.

5

Freedom of association and the right to collective bargaining

We recognize that our employees are entitled to be – or refrain from being – union members and to be represented in collective bargaining agreements. We shall not interfere with or prevent the formation of trade unions or collective bargaining and are to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

In countries where the right to freedom of association and/or collective bargaining is limited by law, the employer shall facilitate, and not prevent, the development of alternative forms of independent and free worker representation and negotiations.

We respect employees' rights to unionize and engage in collective bargaining.

ILO Conventions No. 87 and 98

6

Forced or Compulsory Labour

We will not use any form of forced labour, bonded labour, slave labour, involuntary labour or compulsory labour in all its forms, which is prohibit. Workers shall not be required to provide any kind of deposit or relinquish identity papers to the employer, and the worker shall be free to leave the employer after reasonable notice. We shall not be involved in human trafficking in our business activities.

ILO Conventions No. 29 and 105

7

Child Labour

We do not employ children below the age of 15 and shall not exceed the national minimum age for work, or age of completed compulsory education, whichever is higher.

We will ensure that no person under the age of 18 shall carry out hazardous work that is dangerous to their health, safety, norms and values, including night work.

ILO Conventions No. 138 and 182, United Nations Convention on the Rights of the Child article 32.

8

Discrimination

We will work actively to protect our employees from discrimination and implement necessary measures to create an inclusive working environment.

Hallgruppen expects our suppliers to treat all employees fairly and provide equal opportunities in areas such

as employment, pay and pensions, regardless of gender, age, ethnicity, religion, disability, sexual orientation or other factors, as well as other considerations protected by law in the country where the contract is conducted.

ILO Conventions No. 100 and 111



**We strictly prohibit
forced labor,
child labor, and
discrimination,
ensuring full
compliance with all
relevant laws and
ILO conventions.**

9

Wages, Working Hours and other Conditions of Work

We ensure that the wages, hours of work and other conditions of work provided by suppliers should be in line with national legal standards, the ILO Convention or industry benchmark standards that have been approved based on collective bargaining, whichever is highest. The wages need to be sufficient to provide workers with a decent livelihood for themselves and their family, as well as the social benefits that are legally provided.

We ensure that the payment of wages in legal tender, at regular intervals of no longer than one month, in full and directly to the workers concerned. We keep an appropriate record of such payments. We shall ensure that all employees are free to leave their employment/work after giving reasonable notice.

Normal working hours is limited to 48 hours per week (8 hours per day, 6 days a week). Overtime should be voluntary and an exception, and workers should receive premium pay for overtime work.

All workers shall, before starting work, have a written and understandable contract describing the wage conditions and payment of wages, in a language understandable to the employee. Wages shall be paid on time, regularly and in the legal currency.

Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement, and we should inform the workers concerned of such deductions at the

time of each payment. We offer vacation time, leave periods and holidays consistent with applicable local law and/or agreements. Workers shall be provided with at least one day off for every 7-day period.

ILO Conventions No. 1, 87, 95, 102 and 131



Wages and conditions meet or exceed legal or industry standards.



Wages are paid on time, in full, and recorded.



Workers receive written contracts in a language they understand.



Deductions follow legal guidelines, with workers informed.



Employees get vacation, leave, and at least one day off per week.



10

Health and Safety

We shall see too that the working environment must be safe and hygienic, considering industry knowledge and specific hazards. Clear health, safety, fire protection, and emergency procedures must be in place, with a management representative overseeing worker safety. Systems to detect and respond to risks must be implemented. Measures should minimize hazards to prevent accidents and injuries.

Health and safety work must involve both our management and worker representatives for a long-term safe workplace. Regular, documented training must be provided to all workers, including new or relocated staff. Clean toilets, drinking water, and food storage should be accessible.

Vulnerable workers, like young or pregnant staff, require special protection. Personal protective equipment must be provided free of charge, if needed. Employers must ensure adequate medical assistance, such as first aid or access to medical professionals.

If housing is provided, it must be clean, safe, ventilated, and include sanitary facilities, drinking water, and fire safety plans similar to the workplace.

ILO Convention No. 187 and ILO Recommendation No. 115

We are committed to maintaining a **safe and healthy workplace by implementing strict health and safety procedures, ensuring compliance with **industry standards** and relevant regulations.**

11

Harassment, Harsh or Inhumane Treatment

We shall not conduct abuse, threats or harassment, and verbal abuse are strictly prohibited. Disciplinary procedures must be written and clearly explained to workers. Information from subcontractors, customers, and workers must be protected from unauthorized disclosure, respecting personal integrity. The working environment must safeguard personal integrity, offering solutions like lockers, separate hygiene facilities, and private areas in dormitories.

ILO Convention No. 190

We prohibit harassment, abuse, and threats, ensuring a safe and respectful working environment.

12

Environment

We have an effective environmental policy and comply with applicable legislation and regulations on environmental protection. Where possible, we should implement initiatives to promote greater environmental responsibility, continuously minimize greenhouse gas emissions and local pollution, and implement good life cycle practices.

In addition, we shall work towards responsible energy use by prioritizing energy efficiency, reducing unnecessary consumption and, where possible, increasing the use of renewable energy sources.

We comply with environmental laws and promote sustainable practices to reduce emissions, pollution and energy use.

13

Chemical and Hazardous Materials

We identify and manage hazardous materials to ensure safe handling, storage, recycling, reuse and disposal.

14

Wastewater and Solid Waste

We monitor, control, and treat wastewater and solid waste from our operations before discharge or disposal.

15

Air emission

We characterize, monitor, control and treat air emissions such as volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion generated from operations as required prior to discharge or disposal.

16

Waste, Resources Disposal and Recycling

We shall ensure sustainable resource management through responsible resource disposal, increased material recycling and conscious choices that reduce waste and promote circular solutions.

Waste of all types, including water and energy, shall be reduced or eliminated at source through measures such as changes in production, maintenance and construction processes, material substitution, conservation, recycling and reuse of materials.



17

Whistleblowing

Whistleblowing may include violations of laws, regulations, Hallgruppen's ethical guidelines, Supplier Code of Conduct or procedures. We encourage customers, suppliers, employees and partners to report any unacceptable behavior. We want to uncover any form of misconduct so that we can take the necessary corrective measures. Hallgruppen facilitates safe and anonymous whistleblowing, and does not tolerate any form of retaliation against whistleblowers. See our whistleblowing policy on our website.

We expect our suppliers to have their own systems and procedures in place that enable employees to report concerns safely and confidentially, that reports are treated seriously, that necessary measures are followed up, and that whistleblowers are protected from reprisals.

**We promote
a **safe and
respectful**
environment
where concerns
can be raised
confidentially.**

Signing

Thank you for complying with the Supplier Code of Conduct.

By signing this document, we confirm that we fulfill the requirements in this Policy for Responsible Business Conduct and Supplier Code of Conduct.

Date and location

Company name

Position

Name

Signature

Please sign above and return to your contact person at Hallgruppen.



Hallgruppen AS
VAT 915 846 432

www.hallgruppen.com