

# Code of Conduct

Revised for Norwegian Energy Partners 2021





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## 1. General

This Code of Conduct applies to all Norwegian Energy Partners' (NORWEP) employees, advisors and consultants as well as the NORWEP Board of Directors. The Anti-Corruption Policy is an integrated part of this Code of Conduct.

## 2. Human rights

NORWEP will ensure that their activities are conducted in accordance with the principles set forth in the Universal Declaration of Human Rights and in accordance with the ILO Declaration on Fundamental Principles and Rights at Work covering freedom of association and the right to collective bargaining, the elimination of forced and compulsory labour, the abolition of child labour and the elimination of discrimination in the workplace.

## 3. Environment

NORWEP work actively to improve the environment and is dedicated in exploiting renewable energy sources through projects. NORWEP require that we challenge ourselves to create environmentally friendly solutions in our own work.

## 4. Working environment and equal rights

NORWEP is committed to an inclusive work culture and appreciates and recognizes that all people are unique and valuable. NORWEP does not accept any form of harassment or discrimination based on gender, religion, race, nationality, ethnicity, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.

NORWEP will not tolerate any form of abuse, harassment, intimidation, degrading treatment or sexually offensive behavior by or towards employees or others affected by our operations. Comments or any other forms of offensive messages, derogatory remarks or inappropriate jokes are unacceptable.

When representing NORWEP, you are expected to act in a professional and responsible manner towards your colleagues, our partners and others with whom you interact on NORWEPs behalf, and you are representing NORWEP even after regular working hours when travelling or operating on NORWEP business.

## 5. Compliance with applicable local and international laws

NORWEP is subject to Norwegian law but also complies with applicable international law and the law of the host country where activity is conducted.

*NORWEP will encourage and assist its contractors in undertaking the necessary legal obligations to comply with applicable laws and regulations.*



## 6. Competition and antitrust

NORWEP will comply with the applicable antitrust and competition laws and regulations.

*NORWEP employees, advisors and consultants are aware of applicable competition laws and standards and are obliged to compete in a fair and ethically responsible way in all areas where NORWEP activity is conducted.*

## 7. Anti-corruption

Corruption and other unacceptable business practices may represent a challenge in markets where NORWEP and NORWEP partners operate. NORWEP disapproves of corruption and will work actively towards its prevention during the execution of NORWEP partner activities and business, with compliance and guidance by requirements and recommendations in the NORWEP Anti-Corruption Policy. NORWEP manage risks through in-depth knowledge of our markets and business partners.

## 8. Conflict of interest

NORWEP employees, advisors and consultants should strive to avoid conflict of interest situations. Situations that may lead to a possible conflict of interest, such as the personal or economic interest of NORWEP employees, advisors, consultants and their dependents, shall be avoided, and any doubts shall be discussed with one's superior. Significant economic or personal interests that may lead to conflicts of interest shall be brought to the attention of the Managing Director.

*Economic or other interests in companies and businesses that may be regarded as creating conflict of interest situations shall be reported in writing to the Managing Director for prior approval. NORWEPs' Board of Directors shall approve NORWEP employees' board positions in advance.*

## 9. Confidentiality and privacy

NORWEP employees, advisors and consultants will respect the confidentiality of information they are exposed to in the execution of their work. NORWEP employees, advisors and consultants will not make use of this information in a wrongful way. NORWEP will not distribute information that has come to its knowledge in any improper way.

*NORWEP handles information requiring a varying degree of confidentiality. The main rule is that all information is limited to NORWEP employees and NORWEP employees, advisors/consultants and partner companies. Confidential information shall be kept and stored in a responsible way. NORWEP employees, advisors and consultants' duty to maintain information confidential shall remain in place even after their relationship with NORWEP has come to an end.*

NORWEP will comply with privacy requirements by updating the NORWEP Privacy Policy at the website and through daily operations.



## 10. Expressions of concern & NORWEP Integrity Line

NORWEP employees, advisors and consultants shall notify their Regional Director or the Managing Director if there are concerns regarding possible violation of the Code of Conduct, or the Anti-Corruption Policy or other unethical misconduct. The Managing Director will document and verify such notification under due confidentiality and always report the findings to the Chairman of the Board. NORWEP has established an Integrity Line for external reporting or notifications of irregular, illegal or criminal matters. NORWEP accept that employees or others may use the Integrity Line anonymously. NORWEP will not tolerate any form of retaliation against any employee who has expressed such concerns in good faith.

*If a possible breach of this Code of Conduct or similar is discovered, disciplinary action may be taken after due consideration. Such action may include termination of contract and/or other legal steps. NORWEP's Managing Director will handle such cases after consultation with the Board.*

## 11. Liability Disclaimer

This Code of Conduct and related documents do not create any legal rights for partners, customers, vendors, competitors or other persons or entities.