

Promon Group Supplier Code of Conduct

1. Introduction

Promon's corporate culture is based on fundamental values of a sustainable society and is created in the meeting between conscientious executives and employees and based on respect for the value and dignity of each person, as well as openness and honesty. In this document, we describe what this means in practice in relation to our suppliers.

The Supplier Code of Conduct ("SCoC") describes the standard of business ethics applicable for all suppliers in their business relationship with Promon. Suppliers include any legal entity or person that provides products or services requested by Promon.

1.1 Founding principles

Promon complies with the laws and regulations in force in the countries where we operate.

1.2 Promon's values

We are a value driven organization. Our values are the essence of who we are and how we act together.

- We **trust** each other to work towards the same goal and deliver what we promise – to customers, partners, and each other
- We are **curious** to learn from each other. We innovate through curiosity, and it's an essential part of our personal and professional growth
- We have **humor** which enables us to connect with each other, create community and spread positive energy
- We have **ambition** to have the best product on the market and we work towards achieving our ambitious goals together

2. ADHERENCE TO THE LAW

Suppliers shall comply with all applicable local and international laws and regulations. If a requirement of this SCoC differs from national laws or regulations the supplier shall comply with whichever is more stringent.

3. ANTI-CORRUPTION

Promon Suppliers shall not engage in corruption, extortion, embezzlement, or money laundering in any form, offer, give, receive, or solicit any bribes or employ other means to obtain any improper benefit or advantage in the conduct of their business. Promon Suppliers shall not allow others to make improper payments for their benefit.

Promon Suppliers must comply with all applicable anti-corruption, anti-bribery and anti-money laundering laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, as well as laws governing lobbying, gifts, donations, hiring, and payments to government officials, political campaign contribution laws, and other related regulations.

All countries in which Promon conducts business prohibit bribery. Typically, these laws prohibit providing, or promising to provide, any money or anything of value to a government official, to obtain or retain business, or to secure any improper advantage. In some countries this prohibition extends to the commercial context as well (i.e., bribery of employees of private companies). These prohibitions apply whether such action is taken directly, by Promon's employees or through third parties, such as agents, consultants, and intermediaries. It is also illegal and against Promon policy for Suppliers to solicit or accept any payment or anything else of value in return for improperly performing a function of their employment with a Supplier or a duty to Promon. Violation of these laws is a crime that can result in severe fines and criminal penalties. Accordingly, Suppliers must not offer, give, solicit, or receive any form of bribe or kickback anywhere in the world.

It is a violation of this Supplier Code of Conduct (and may be a breach of law) for Suppliers to offer or make a payment or gift of any kind to facilitate a local process or to influence a local government official, however small the payment or routine the government function involved.

Additionally, no Supplier may bribe or provide kickbacks or any other improper payments or improper gifts to any director, employee, representative or agent of Promon, or seek any such bribe or kickback from Promon or any other party.

Promon Suppliers must immediately report to Promon any circumstance where an officer, director, employee, representative or agent of Promon has made any improper request or demand of a Supplier.

4. Commitment to Human Rights and decent labor conditions

Promon's policy reflects the ten principles in the UN Global Compact, which contains principles for corporations, related to human rights, labor, environment and anti-corruption. The principles are based on the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, the United Nations Convention Against Corruption, OECD's guidelines for multinational enterprises and the UN's Guiding Principles on Business and Human Rights.

We make the following requirements of our suppliers, even if this entails requirements that are stricter than required under law in the country where they operate:

- Our suppliers shall respect their employees' rights to be members of a labor union and be represented in collective negotiations. No employee making or not making use of this possibility may be discriminated against.
- Our suppliers may only give gifts and offer services within the limits of sound work ethics and on condition that they are within the limits of the laws applicable in the markets where Promon and the supplier operate.
- We do not accept suppliers that use child laborers, slave labor, debt labor or forced labor.
- Our suppliers shall actively strive for an equal and non-discriminatory recruitment process and workplace.
- Our suppliers shall offer employment terms adapted to the markets on which they operate and always pay at least the regulatory minimum wage in the countries where this exists. All this means that employees at Promon suppliers are paid above living wage. All employees of the supplier shall have valid employment contracts.
- Our suppliers shall work to ensure the health, safety, and environmental well-being of their employees and workplace to prevent accidents, injuries, and environmental harm.

The suppliers that Promon hires shall work in accordance with the same basic values as Promon. This is ensured by Promon choosing suppliers that, after evaluation by Promon, are considered to work in accordance with the Promon Group *Supplier Code of Conduct*. Promon can also ensure this by having the supplier contractually commit to observing the Promon Group *Supplier Code of Conduct*.

Some of Promon's suppliers are also clients of Promon. In cases when Promon chooses not to use a supplier with reference to the Promon Group *Supplier Code of Conduct*, we usually also elect not to have that company as a client.

5. Sustainability and environment

At Promon, we are committed to promoting sustainable growth and doing our part in combatting climate change. We recognize our obligation towards society, our stakeholders, and the environment to minimize the impact of our business operations and investments. Hence, we are committed to adhere to this Climate Policy, to ensure its implementation in our own business, and across the Promon Group.

We are committed to reducing our carbon footprint throughout all our operations and our investments. Specifically, Promon have developed an action plan to achieving carbon neutrality.

Suppliers shall take a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility.

Suppliers shall proactively participate in the protection of the environment in relation to their business operations, while complying with applicable laws and regulations, as well as obtaining all necessary environmental approval, permits and registrations.

Suppliers are expected to support Promon's environmental commitments and implement activities to continuously reduce the environmental impact of their operations.

6. Security and information security

Promon's suppliers are expected to continuously ensure the protection of Promon's and Promon's customers assets against both intentional and unintentional threats, in accordance with applicable laws, regulations, contractual requirements, as well as other business needs and expectations.

Promon's suppliers are expected to respect the intellectual property rights (patents, copyrights, and other rights) relevant to use of third-party products in solutions developed by the supplier for the benefit of Promon or Promon's customers.

In case of a suspected security incident, whether related to physical assets or to information, Promon is to be informed without delay.

7. Compliance and reporting

Promon's suppliers shall ensure that all the requirements of the Promon Group *Supplier Code of Conduct* are monitored and complied with within their operations and those of their direct suppliers.

The supplier shall, on its own initiative, report any breaches of the Promon Group *Supplier Code of Conduct* by contacting the purchaser within Promon's organization or by sending an e-mail to legal@promon.no.

The supplier shall provide Promon access to its facilities and/or staff, if Promon requests to inspect the supplier's operations to ensure that the supplier fulfills the requirements of the Promon Group *Supplier Code of Conduct*.

Actions in breach of the Promon Group *Supplier Code of Conduct* will immediately be attended to and may also be the object of actions and follow-ups or termination of a supplier agreement. In case of gross breach of the Promon Group *Supplier Code of Conduct*, the termination of the supplier agreement will be made waiving any terms of notice and/or any compensations to the supplier for early termination.