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Revidert av	Asle Marius Hoel	Eier/Rolle	IKM Gruppen - HMSK Leder	
Godkjent av	Svein Martin Løvås	Fellesdokument for	IKM	

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## 1 Purpose

The purpose of this document is to summarize the standard for IKM's business conduct and for it to be environmentally and socially sound and in the best interests of IKM and our stakeholders.

## 2 Responsibilities

Everyone who acts on behalf of IKM is expected to do so complying with applicable laws, our Code of Conduct and other governing documents.

Leaders are expected to act and ensure activities within their areas of responsibility are carried out in accordance with the Code of Conduct. Leaders are also expected to demonstrate ownership and commitment towards the Code of Conduct in their actions and in what they communicate.

## 3 Scope

Our Code of Conduct applies to:

- all employees and all hired personnel at work, assignment or travel for IKM.
- all work performed by IKM or on behalf of IKM.

## 4 About Our Code of Conduct

Our Code of Conduct commits all personnel working for IKM at all levels to act in a manner being environmentally and socially sound.

The parameters of compliance can differ due to variations in the laws, regulations and practices in the countries in which IKM conducts business.

Our Code of Conduct is based on the following documents:

- [UN Universal Declaration of Human Rights](#)
- [United Nations Guiding Principles on Business and Human Rights - UNGP](#)
- [United Nations ten Principles of the Global Compact - UNGC](#)
- [ILO Declaration on Fundamental Principles and Rights at Work \(1998\)](#)

In addition, we are actively working to achieve [The UN sustainable development goals](#).

Our Code of Conduct reflects our values of being:


- **Responsible**
- **Bold**
- **Clear**
- **Focused**

### 4.1 IKM's Commitment

We can only gain trust from our society, customers, employees and other stakeholders by applying high ethical standards in our business conduct.

We believe this can be achieved by always complying with applicable laws, acting socially and environmentally responsibly and by applying ethical principals in our business conduct.

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IKM requires that every employee to be aware of, understand, and be committed to conducting business in a manner that is consistent with these standards and in full compliance with all applicable laws.

Furthermore, IKM sets the same expectations for our business partners through [IKM-HMS-F-19E IKM Business Partner Code of Conduct](#) and will not collaborate with business partners not respecting the same ethical standard.

## 4.2 Questions, Concerns and Reporting

If there are any questions or concerns regarding the Code of Conduct or how to comply with it, please seek advice with:

- your immediate superior
- or other superior in the organization.

All employees, including temporarily hired personnel and third parties with whom IKM Group has a business relationship (e.g., suppliers, customers, etc.) can, and are encouraged to, raise a concern if a censurable condition or wrongdoing is observed within IKM.

There are several channels for reporting a censurable condition or wrongdoing:

- To your immediate superior or another superior in the organization
- To the safety delegate, union representative or the occupational health service.
- By using IKM Group's external notification channel (Whistle blower). This service is operated and handled by KPMG Forensic in Norway.

### 4.2.1 Prohibition of Retaliation

Retaliation against employees who give notice or express that he or she is considering giving notice is illegal. This also applies to hired employees who give notice. The employee must nevertheless tolerate factual counterarguments or counterevidence related to the censurable conditions he or she presents.

It is important to note that the prohibition on retaliation only applies if a prudent procedure for the notification is followed. IKM complies with applicable laws and regulations in the countries in which we operate.

## 4.3 Consequences of Breaches

Breaches of the Code of Conduct, the Law or other governing documents will not be tolerated. Potential breaches may be investigated by internal or external parties.

Breaching the Code of Conduct may result in:

- Warning
- Termination of employment or contract
- Reporting to authorities

This also applies to leaders tolerating such breaches to exist.

## 4.4 Compliance

We work in a systematic manner to ensure compliance with applicable laws and governing documents. This done by regularly reviewing our system towards governing documents.

# 5 Human Rights

IKM supports initiatives that work to strengthen human rights.

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IKM will work with its employees, suppliers, and business partners to uphold these universal values.

### 5.1 Equality, Diversity and Inclusion

IKM shall treat all employees equally. IKM shall not discriminate during hiring and have employment practices independent of race, color, language, religion, age, nationality, social or ethnic origin, sexual orientation, gender, disability, political or other opinion, property, birth or other status.

### 5.2 Harassment and Intimidation

IKM expect all employees at any rank to treat colleagues and business partners with courtesy and respect. They shall likewise expect to be treated in such manner. Unwanted sexual attention, harassment or other intimidating behavior is not tolerated.

### 5.3 Purchase of Sexual Services

IKM prohibits the purchase and contribution to the purchase, of sexual services when on assignments or business trips for IKM.

Purchase of sexual services support human trafficking and pose a security risk. Human trafficking violates human rights, regardless of local rules, regulations and customs.

## 6 The workplace

### 6.1 Safety and Security

Zero injuries, our overall objective! We strive to provide a safe, healthy and secure working environment for all our personnel at all locations, with minimal impact to the environment.

We build our safety culture on Life-Saving Rules and by continuously improving our systems and behavior by learning for from our safety reporting.

### 6.2 Privacy and Data Protection

Privacy and data protection laws protect private information for all personnel involved with IKM. We are committed to protecting the privacy of our employees and everyone involved with IKM.

We will only use personal data for appropriate purposes, and personal data will be processed in accordance with applicable laws and internal requirements.

### 6.3 Alcohol and drugs

IKM prohibits substance abuse and storage of intoxicants. See [IKM-HMS-RU-06E Alcohol and Drugs Policy](#).

1. The workplace must be free of intoxicants. No one should be in possession of intoxicants during working hours.
2. Substance abuse is not permitted during working hours. It is unacceptable to meet at work under the influence of drugs. No one should use intoxicants in their free time, so that it has a negative effect on the work situation. This also applies to hangovers and the smell of alcohol.
3. The company does not accept that employees use, sell, or otherwise distribute illegal intoxicants during or outside working hours. This also applies to trips abroad.

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4. No one should use intoxicants in their free time, so that it has a negative effect on the work situation.
5. Violation of the company's alcohol and drug policy may result in termination or dismissal. This will be assessed in relation to the degree of the violation.
6. In case of reasonable suspicion of intoxication or if a work operation, position or role is defined as particularly risky, personnel may be required to be drug tested.

### 6.3.1 Exceptions

1. Storage and use of prescribed medications, alcoholic gifts or prizes is accepted.
  - o The use of medication or other substances that may impair judgment or performance must be clarified with the immediate supervisor.
2. In other cases, you can apply to the human resources manager.

## 7 Work Rights

### 7.1 Freedom of Association and Collective Bargaining

IKM respect and support employees right to freely join associations of their own choice.

We support collective bargaining to determine terms and conditions of work and the regulation of relations between employers, employees and their organizations.

### 7.2 Child Labor and Forced Labor

IKM will not use or tolerate child labor or forced labor being used in our own or any other business activity.

IKM will make employment contracts available to all employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to terminate such agreements and any penalties that may be associated with termination of work.

In planning and conducting IKM business operations, ensure that employees in forced labor are not engaged and, where found, provide for the removal of such employees from the workplace with adequate services and provision of viable alternatives in the community of operation.

### 7.3 Discrimination in Respect of Employment and Occupation

IKM do not discriminate. Qualifications, skill, and experience are the basis for the recruitment, placement, training and advancement of staff at all levels.

Where discrimination is identified, IKM will address complaints, handle appeals and provide support for employees.

IKM will reasonably adjust the physical environment to ensure health and safety for employees, customers and any visitors with disabilities.

## 8 Environmental protection

We shall prevent pollution and reduce negative environmental impact. We will comply with all applicable environmental laws and regulations.

We assess and follow-up the impacts our activities have or may have on the environment.

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IKM will seek efficient ways to use and minimize use of resources. In this way we can reduce our carbon footprint, use of harmful substances and other emissions. Such as by reducing the need for travel and by substituting harmful chemicals.

We will ensure that environmentally friendly technologies are considered when making business decisions.

## 9 Business conduct

### 9.1 Conflict of Interest

A conflict of interest may affect your ability to make the right decision for IKM.

Do not participate in any IKM related business, procurement or other contract award if you or a related person, such as your partner or a close relative, have a financial interest. This also applies if there are other settings that weakens your ability to act in the best interest of IKM.

Inform and discuss with your leader any situation that might lead to an actual or apparent conflict of interest.

### 9.2 Board Positions and Ownership Interests

We expect all employees to spend their whole working day on IKM matters.

Written consent from your division manager or above is required before accepting external board memberships.

#### Remuneration

- If you hold board position in an IKM company, you are not entitled to remuneration.
- If you hold board position behalf of IKM, you may be entitled to remuneration, but you need approval from division manager or above.
- If you hold board position in a private capacity, you may retain any remuneration, but the board position should be clarified with IKM.

There are certain specific requirements for registering board members for the following categories of employees:

1. corporate management and division management and CEO
2. employee representatives on the board of IKM
3. and employees who by position can influence IKM procurements or other contract awards.

These categories of employees must register all board memberships, except

- board positions in IKM companies
- or when representing IKM in non-controlled companies.

If the employee can make influence on business decisions, employees in categories 1. and 2. cannot directly or indirectly

- hold ownership interests,
- hold options to ownership interests,

to any competitors or companies that does or seeks to do business with IKM.

This does not apply to ownership interests in securities funds or shares in IKM.

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### 9.3 Gifts and Expenses

Giving or accepting gifts and hospitality may be regarded as corruption. We only offer or accept hospitality where there is a clear business reason for IKM to participate and the costs involved are reasonable.

- As a rule of thumb, gifts are not accepted. However, promotional items of insignificant value are accepted.
- We will always pay our own costs related to travel, accommodation and other related expenses.
- IKM will not pay for travel, accommodation and other related expenses for others, except if is relevant for business on behalf of IKM.

### 9.4 Anti-Corruption

IKM will comply with all anti-corruption laws and regulations. IKM will not tolerate corruption in any form and will actively prevent corruption to take place in our business conduct.

We believe transparency is crucial in the fight against corruption. We are committed to conducting our business activities in an open and transparent manner.

### 9.5 Anti-Money Laundering

Money laundering is illegal and supports criminal activities. IKM will comply with all applicable anti-money laundering laws.

### 9.6 Financial Reporting

Recording and reporting financial or non-financial information completely, accurately and objectively is essential for IKM's credibility and reputation. It is also an assumption for meeting legal obligations and standards. We are committed to accuracy in all our dealings, and we will provide full, fair and accurate disclosures in our financial reports and documents filed with authorities.

### 9.7 Inside Information

IKM supports fair and open securities markets wherever we operate. You may become aware of information about IKM or other companies that is not publicly available. Such information may constitute inside information. Inside information is precise information likely to have a significant effect on the price of securities and which is not publicly available or commonly known to the market.

If you are in possession of inside information, even if acquired incidentally, you have a legal duty of confidentiality and due care of handling to prevent such information from coming into the possession of unauthorized persons. Any use of inside information about IKM or other publicly traded companies for personal gain is prohibited.

### 9.8 Fair Competition

IKM will always strive to compete in a fair and ethically justifiable way and comply with applicable laws for competition.

IKM will not tolerate or engage in anti-competitive behavior, such as:

- price fixing
- bid rigging
- market sharing
- abuse of market power
- sharing non-public commercially sensitive information with competitors

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## 9.9 International Trade Restrictions

We will comply with all applicable economic sanctions as well as export and import control laws. We will evaluate whether government authorization is required before engaging in activities involving restricted items, sanctioned parties or countries and will obtain and comply with all required authorizations.

## 9.10 Property and Assets

IKM trust employees with its assets to be able to perform work. All employees are responsible to not misuse and to protect the assets against theft and loss.

IKM's assets include:

- Facilities
- Equipment
- Computers
- Software
- Information
- Intangible property rights
- Financial assets

Any misuse of our assets for personal benefit is not acceptable.

## 9.11 IT Systems and Information Management

The use of our IT systems must be based on business needs. Information produced and stored on our IT systems is IKM's property and may be accessed in accordance with applicable law.

Due to risk of cyber-attacks and malicious activity, our IT solutions and equipment may be monitored to detect such risk.

IKM will protect important information created by us, or given to us, to ensure appropriate confidentiality and integrity.

All use of information systems must take place in accordance with our Security Instructions for Use of IT Systems in IKM.

# 10 Society

## 10.1 Community Engagement

Our local community is an important stakeholder to IKM. We believe our presence as a stable employer create lasting value to the local community at our locations.

We do so by building our business, seeing new opportunities, and having a safe working environment for our employees. Our contribution may also include direct and indirect local employment, local procurement of goods and services as well as social entrepreneurship.

## 10.2 Public Communication

We believe accurate and honest information to the public is important to our integrity. Only authorized personnel may talk to the media or make statements on behalf of IKM in social media.



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### 10.3 Public Affairs

We will promote IKM's interests on important industry matters through active engagement with government policy makers, branch associations and others, such as media.

However, we will not make gifts, donations or otherwise support political parties or individual politicians.

We may nevertheless be members of interest organizations relevant for our industry that support political parties or certain political issues.

### 10.4 Intermediaries

Intermediaries are business partners including agents, consultants, lobbyists and others who act as a link between IKM and others. The use of intermediaries may pose a particular risk to us, and we therefore have additional requirements for hiring intermediaries.

It is mandatory to perform integrity due diligence on all intermediaries. The agreed compensation must be proportionate to the service rendered and only paid against satisfactory documentation of work performed. The agreement with the intermediary must be made in writing, describe the true relationship with IKM and include an obligation to follow IKM's code of conduct.