

# Ethics and Anti-Corruption Policy

## 1. Basic Principles

NLI's ethics and anti-corruption policy is to ensure high ethical standards in all matters relating to operation and development of the company.

Ethics and anti-corruption policy is primarily a tool for influencing the behavior and culture of the company, including integrity, honesty and reliability.

A good and reliable reputation is vital to our business. The company's reputation will ensure our issues, ensure the recruitment, prevent employees from resigning and ensure our credibility with partners.

### **The company's ethics and anti-corruption policy:**

- apply to the board members, directors, employees and all contracted personnel.
- shall be reviewed with the board members, employees and new recruitment.
- must be enclosed temporary employment agreements and partnerships in which the company is a party.

### **The company shall be conducted in an ethical and socially responsible manner regarding:**

- management / organizational management
- human rights
- employment
- environment ( inner and outer)
- reputable business
- consumer issues
- commitment to the local community

The company is subject to Norwegian and international laws, rules and conventions. Some of the Norwegian legislation also applies abroad, including "the Corruption Act".

The company's ethics and anti-corruption policy support the Norwegian Standard NS-EN ISO 26000:2010 - Guidance to social responsibility.

## 2. Internal issues

### Human dignity

NLI will show respect for all individuals and work actively for equality and diversity. We do not accept discrimination of any kind, such as on the basis of gender, race, religion and sexual orientation.

### Working environment - HR policy

The company is a good and stimulating place to work and has an inclusive work environment. We must act with respect and integrity towards our colleagues and others we encounter in our work. Discrimination, bullying, harassment and similar behavior will not be tolerated.

### Health, safety and environment

NLI is concerned that HSE is attended to towards our employees to obtain job satisfaction and a healthy working environment, thereby partly contributing to low absence due to illness.

### Conflict of interest

The company shall respect the individual's right to privacy and private interests. All employees are expected to be loyal to the company and its interests. Employees shall not engage in economic or business activities in which there may be a conflict of interest between the company's interests and his or her own or related third party interests.

### Confidentiality

Everyone included by this document have confidentiality on all business matters and other matters that could give outsiders access to confidential information. Basically all issues that are not published publicly are not to be disclosed. This also applies when discussing the company's internal affairs in front of others.

## 3. Relations to partners

### Customers

All customers shall be treated with respect, integrity and insight. We will attend to customer's needs in the best possible manner within the commercial and ethical limits that apply to the company.

### Business Operations

The company adheres to high ethical standards and transparency in its daily activities:

- respect local laws and regulations in the countries where we operate.
- ensure that transactions are recorded and documented properly in accordance with local and international accounting standards.
- not give outsiders confidential information .
- comply with internal standards and guidelines regarding HSE, economy and finance, communication, human resources, crisis management, e-mail and internet use.

**Providers**

Suppliers shall be treated impartially and fairly. They must be confident that they compete for contracts with the company on an equal footing with other providers.

**Society**

The company aims to be a responsible organization in relation to its employees and in relation to their surroundings, and be respectful of cultures and religions in countries where we operate or do trade.

**Representation, events, travel**

All representation and participation at events paid by others must without exception be approved by a representative of the company's management team. The purpose should be professional and not be linked to influence a future decision of the company.

Travel costs for representation shall initially be borne by the company.

**The company's ethics and anti-corruption policy includes in this context the following:**

- Any kind of bribery, attempting to bribe others or being bribable, is considered to be a violation of our ethics and anti-corruption policy.
- Payment of travel, dinners and events for clients or others must have a clear business justification and be transparent.
- Exercise caution when giving and accepting gifts or other benefits that may affect business decisions. The term "gift" includes not only material objects, but also other forms of benefits such as discounts on purchases of goods and services. Receiving a gift that without doubt has a value of NOK 500, will be reported to superiors. Promoting articles are not considered gifts.

**Corruption**

Corruption undermines all sorts of business and free enterprise. It is damaging to the reputation and exposes the business and the individual for risk. The company does not accept any form of corruption.

**Buying and selling sexual services**

The company is against buying and selling sexual services.

Buying and selling sexual services can sustain human trafficking. Human trafficking is illegal and a violation of human rights. The individual must refrain from buying and selling sexual services when on mission and on business travel for the company.

**Intoxicant**

The company is a intoxicant-free workplace. Consequently, one should not be affected by alcohol or other drugs while at work for the company.

Limited amounts of alcohol can still be served when local custom and special occasions makes this appropriate, but not consumed while operating machinery, driving or doing other activities

incompatible with the use of alcohol. This also applies when one is at work on assignments or on business travel. No person shall use, or encourage others to use, intoxicants in a manner that can put the user, company, or any partners in an unfavorable light.

#### **4. Internal awareness, training and supervision**

To ensure that the company's ethics and anti-corruption policy is followed, education and awareness is emphasized. This is carried out through a basic training program which all managers and relevant employees must undergo, and is followed up in the annual appraisals accordingly.

The efforts to prevent unethical business conduct is continuous and ongoing.

#### **5. Monitoring the company's ethics and anti-corruption policy**

If in doubt of the contents, or violation, of the company's ethics and anti-corruption policy, this must be discussed with the immediate supervisor, or if necessary, another representative from the management. Enquiries can be made anonymously, in which case in writing / letter. There is no kind of retaliation against anyone who in good faith reports a violation or suspected violation of the company's ethics and anti-corruption policy.

Corruption and suspicion thereof shall immediately and without exception be followed-up and handled with a firm hand.

Violations of the company's ethics and anti-corruption policy can affect employment.

#### **6. Management of Responsibility**

The CEO is responsible for implementing and monitoring compliance of ethics and anti-corruption policy in their own company, and in collaboration with his staff establishes a contingency relative to the risk of being involved in corruption. In situations where the Transparency International 's Corruption Index, and other relevant external reports, indicate a high risk of corruption due caution should be exercised.

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