

	<b>A-0102 Ethics and Anti-Corruption Policy</b>						
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## Ethics and Anti-Corruption policy

### 1. Basic principles

The company's ethics and anti-corruption policy shall ensure a high ethical standard in all contexts related to operations and development.

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

A good and reliable reputation is crucial for our business. The company's reputation must ensure a breakthrough for our interests, ensure good recruitment, make us keep our employees, and ensure credibility with our stakeholders.

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

- applies to the company's board members, managers, employees and all hired personnel.
- shall be reviewed with the board members, all employees and for new appointments.
- shall be attached to hiring / consulting agreements and partnerships / collaboration agreements where the company is a party.

#### **The company shall conduct in an ethical and socially responsible manner with regard to:**

- management / organizational management
- human rights
- working conditions
- environment (internal and external)
- 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 legal regulations also apply outside the country's borders, including "The Corruption Act".

The company's ethics and anti-corruption policy is based on Norwegian Standard NS-ISO 26000: 2010 - Guidance on social responsibility.

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## 2. In-house conditions

### Human dignity

NLI will show respect for all individuals and work actively for equality and diversity. We do not accept discrimination of any kind, e.g. due to gender, race, religion or sexual orientation.

### Working environment - personnel policy

The company must be a good and stimulating workplace and have an inclusive working environment. We must act with respect and integrity towards our colleagues and others we encounter in our work. Discrimination, bullying, harassment and similar behaviour are not tolerated.

### Health Safety and Environment

NLI is highly engaged in health, environment and safety for our employees. We facilitate for a high level of well-being and a healthy working environment, and thus contributes to low sickness absence.

### Conflict of interest

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

### Duty of confidentiality

Everyone covered by this document has a duty of confidentiality regarding all business matters and other matters that may give outsiders access to confidential information. In principle, all business matters that have not been published are publicly covered by silence. This also apply for discussing the company's internal affairs in the presence of outsiders.

## 3. Relations with stakeholders

### Customers

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

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### **Business operations**

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

- We respect local laws and regulations in the countries where we operate.
- We ensure that transactions are registered and documented correctly in accordance with local and international accounting practices.
- We do not give outsiders confidential information.
- We comply with internal standards and guidelines regarding HSE, finance and economics, communication, HR, emergency preparedness, e-mail and internet use.

### **Suppliers**

Suppliers shall be treated impartially and fairly. They must be assured that they are competing for contracts on an equal basis with other providers.

### **Society**

NLI aims to be a responsible organization both in relation to our employees and other relations in our surroundings. We are respectful of cultures and religions in countries or regions where we operate or trade.

### **Representation, events, travel**

A representative of the company's management team must without exception approve all representation and participation in events paid for by others. The purpose must be professional, and not be linked to influencing a future decision in the company.

Travel costs for representation shall in principle be covered by NLI.

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

- Any form of bribery, attempting to bribe others or allowing oneself to be bribed, is considered a violation of our ethics and anti-corruption policy.

Payment for travel, dinners and events for customers or others must have a clear business justification and take place in transparency.

- Show consideration in giving and receiving gifts or other benefits that may affect business decisions. The term "gifts" includes not only material goods, but also other forms of goods such as discounts on any private purchase of goods or services. If you receive a gift that without a doubt has a value of more than NOK 500,- this must be reported to superiors. Profiling items are not considered gifts.

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### **Corruption**

Corruption undermines all forms of business and free enterprise. It is destructive to our reputation and exposes the business and individuals to risk. The company does not accept any form of corruption.

### **Purchase and sale of sexual services**

NLI is against all purchase and sale of sexual services in any context. It shall not occur in the service context. Service context in this connection also includes leisure time while traveling.

Buying and selling sexual services can help sustain human trafficking. Trafficking in human beings is illegal and a violation of human rights.

### **Drugs**

The influence and use of drugs (alcohol, narcotics, synthetic drugs etc.) in the service context is prohibited.

During social events during working hours (eg lunch), only non-alcoholic beverages should be served and enjoyed.

Outside working hours, alcohol can be enjoyed to a limited extent. The provisions on drugs apply in all service contexts, at home and abroad.

## **4. Awareness, training and follow-up**


To ensure that the company's ethics and anti-corruption policy are followed, training and awareness-raising is emphasized. This is carried out through a basic training program, which all managers and relevant employees must participate, and thereafter is followed up in the regular employee interviews.

The effort of preventing unethical business conduct is continuous and ongoing.

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

If in doubt of the contents, or in case of violation of the company's ethics and anti-corruption policy, it must be raised and discussed with the immediate superior, or if necessary, another representative from the management of the company.

Reporting/whistleblowing can be made anonymously, in which case in writing / letter form. No form of retaliation shall occur against anyone who in good faith reports a violation, or suspicion of a violation, of the company's ethics and anti-corruption policy.

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In the event of suspicion of, or detection of corruption, this must be handled immediately and without exception as a notification case. First to the immediate superior. If it is not possible / natural, the leader for the level above is notified, etc.

Violation of the company's ethics and anti-corruption policy may have consequences for the employment relationship.

## 6. Management of Responsibility

The CEO is responsible for implementing and monitoring compliance with ethics and anti-corruption policy in their own company, and in collaboration with his or her staff, establishing a contingency plan in relation to the risk of being involved in corruption. In situations or regions where Transparency International's Corruption Index, and other relevant external reports show a high risk of corruption, special care must be taken.

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