

# Nekkar

## Code of Conduct for Business Partners



### The Nekkar Way of Business

The Nekkar<sup>1)</sup> way of business is based on our core values of commercial understanding, simplicity, efficiency and continuous improvement, and we are committed to conduct business in a lawful and ethical manner. In order to achieve sustainable business solutions of high ethical standard, we are dependent of our Business Partners<sup>2)</sup> as important members of the worldwide team contributing to our success. Nekkar expects that our Business Partners, act in compliance to applicable law and share our values and acknowledgement of internationally recognized compliance standards as described in this Code of Conduct.

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### NEKKAR'S ETHICAL STANDARDS

#### Compliance with law

Nekkar expects all Business Partners to comply with all applicable laws, regulations and agreements in connection with the performance of its activities related to Nekkar. Without limiting the generality of the foregoing, Nekkar will in the following highlight some of the core legal areas that Nekkar will require compliance to.

#### Anti-corruption

Nekkar has zero tolerance for corruption in any form. This includes bribery, facilitation payments and trading in influence, and applies both directly and to activity through third parties. Nekkar require all Business Partners to comply with all applicable anti-corruption laws and regulations and that the Business Partner take active steps to ensure that corruption does not occur in relation to its own or Nekkar business operations. Nekkar's business partners are expected not to offer, directly or indirectly, to any Nekkar representative, or anyone closely related to such persons, any gifts, hospitality, expenses or any other favours unless of minimal value and unrelated to situations of contract bidding, evaluation or award.

#### Anti-money laundering

Nekkar has zero tolerance for money laundering in any form and will only conduct business with partners involved in legitimate business activities with funds derived from legitimate sources. All Business Partners are expected to comply with all applicable anti-money laundering laws and that they take active steps to prevent and detect business activities involving proceeds of a crime within their operations.

#### International trade restrictions

Nekkar shall never make transactions with any natural or legal person that are blacklisted or under embargo, and neither involve in any business regarding deliveries that are restricted or sanctioned by any nation,

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<sup>1</sup> NEKKAR includes all the companies within the NEKKAR Group (parents, subsidiaries, affiliates to Nekkar ASA)

<sup>2</sup> Business partners include, but are not limited to suppliers, distributors, agents and joint venture partners.

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organisation or union. Nekkar expects the same from all its Business Partners and that they declare to the best of their knowledge that their business with Nekkar do not involve such persons or deliveries.

### **Insider trading and market abuse**

Nekkar is a publicly listed company and both Nekkar representatives and its Business Partners can become aware of confidential non-public information concerning the company. Nekkar expects all Business Partners to comply with all applicable laws regarding insider trading and market abuse and to adapt a zero-tolerance policy for the use of confidential information for any other purpose other than the conduct of the business with Nekkar.

### **Human rights**

Nekkar expects the Business Partners to respect all internationally recognised human rights and that they conduct their activities accordingly, as for example outlined in the United Nation's Guiding Principles on Business and Human Rights. We require that all employees of our Business Partners are treated equally and fairly, and that equality of opportunities are based on merit, irrespective of gender, race, disability, sexual orientation, religion, political opinion, national, ethnic or social origin. Nekkar will not engage or employ people against their own free will or let anyone do so on its behalf. All Business Partners of Nekkar are required to refrain from any use of involuntary or forced labour, and any use of child labour shall comply with internationally recognized standards such as UNICEF's guidelines, ILO Conventions and recommendations, as well as local legislation.

### **Labour rights**

Nekkar is committed to provide a safe and secure environment for everyone who performs assignments on our behalf. We shall comply with laws and agreements regarding health, safety and working hours as well as awarding wages that are fair and respect the freedom of association. We expect the same from our Business Partners.

### **Environment**

Nekkar expects all Business Partners to operate according to internationally recognized environmental management principles and aim for continuous improvement both locally and globally. Nekkar encourages all Business Partners to use sustainable and environmentally friendly technologies, products and services to minimize harmful discharge, emissions and waste production in a lifecycle perspective.

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### Personal Data Protection

In addition to compliance to all applicable data protection laws Nekkar expects its Business Partners to respect and protect the integrity and confidentiality of a person's privacy through the processing of personal data.

### Fair Competition

Nekkar prohibits anti-competitive agreements or conduct, including amongst others, fixing prices, restricting the supply of goods or services, bid rigging and market sharing. Nekkar expects its Business Partners to be committed to free and fair competition and to comply with relevant competition laws and regulations.

### Conflict of interest

Nekkar expects its Business Partners and their employees to refrain from taking part in or seek to influence any decision under circumstances that can give rise to an actual or perceived conflict of interest. Such circumstances may be a business interest or a personal interest in the subject matter, economically or otherwise, directly or through someone closely related.

## NEKKAR COMPLIANCE MEASURES

Compliance related to the interaction with our Business Partners is an important element of Nekkar's compliance program, and Nekkar does therefore expect all Business Partners to have implemented a risk based compliance program on their own with adequate preventive and detective control measures according to applicable law and internationally recognized compliance standards.

As part of the Nekkar compliance program Nekkar require all Business Partners to participate willingly in Nekkar's Integrity Due Diligence processes and to potential audits in regard to the assessment of their fulfilment of Nekkar's Code of Conduct for Business Partners.

Any breach of or possible non-compliance to this Code of Conduct should be reported immediately to Nekkar, and the issue in question will be subject to adequate investigation which Nekkar require that its Business Partners willingly participate to.

Non-compliance to this Code of Conduct can result in termination of the contract or business relationship with the Business Partner, and Nekkar will require compensation from the Business Partner of all economic loss and possible penalties related to the violation.