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Geminor: Supplier and Business Partners Code of Conduct

GEMINOR

Introduction

At Geminor, we are committed to conducting our business in a responsible, ethical and sustainable manner. We expect our suppliers and business partners to share this commitment and to contribute to safe, fair and responsible working practices throughout our value chain.

This Code of Conduct sets out the minimum standards and expectations that apply to all suppliers, contractors, sub-contractors and other business partners providing goods or services to Geminor. These requirements also apply to their employees, representatives and any third parties acting on their behalf.

By working with Geminor, suppliers and business partners are expected to comply with this Code of Conduct and to promote the same principles within their own operations and supply chains.

Compliance with the code and applicable law

Suppliers and business partners providing goods or services to Geminor are required to comply with all applicable laws and regulations, as well as the requirements set out in this Code of Conduct.

Where applicable laws, regulations or industry standards address the same matters as this Code of Conduct, the highest standard shall apply.

This Code of Conduct sets out Geminor's key requirements for suppliers, contractors, sub-contractors and business partners.

Suppliers and business partners are responsible for ensuring compliance with this Code of Conduct within the scope of their work for Geminor. This includes taking appropriate steps to ensure that their own employees, representatives, sub-contractors and relevant third parties acting on their behalf comply with the same principles.

Any concerns or suspected breaches of this Code of Conduct must be reported in accordance with the reporting principles set out by Geminor.

Supplier responsibility

Suppliers and business partners shall comply with this Code of Conduct and are responsible for ensuring compliance within their own organisation and, where relevant, throughout their supply chain.

Suppliers and business partners shall provide accurate and complete information when requested by Geminor as part of onboarding, due diligence, monitoring, reassessment, audits or other compliance activities.

Geminor reserves the right to verify suppliers' compliance with this Code through information requests, documentation review, meetings, site visits or audits, either directly or through appointed representatives, where relevant and proportionate to the risk.

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Suppliers and business partners are responsible for ensuring compliance with this Code within their own organisation and, where relevant, throughout their supply chain. Suppliers shall communicate equivalent requirements to their sub-contractors and shall take reasonable steps to monitor and address non-compliance.

Suppliers and business partners shall promptly notify Geminor of any actual or suspected breach of this Code, applicable laws, permits, contractual requirements or other circumstances that may affect their ability to meet Geminor's requirements.

Under the Norwegian Transparency Act "Åpenthetsloven", a request for information from Geminor's Norwegian Branch must be answered within three weeks unless a reasonable legal justification can be provided.

Health, Safety and Working Environment

Suppliers and business partners must provide a safe and healthy working environment for their employees, contractors and others affected by their activities. They are expected to identify, prevent and reduce health and safety risks, and to comply with applicable health and safety laws and regulations.

Suppliers and business partners should encourage reporting of accidents, near-misses, hazards and incidents, and take appropriate corrective actions when needed.

Anti-corruption and bribery

Geminor has zero tolerance for corruption and bribery. Suppliers and business partners must conduct business honestly, ethically and in compliance with applicable anti-corruption laws. Suppliers must not offer, give, request or accept anything of value that could improperly influence a business decision, and must be able to demonstrate appropriate measures to prevent corruption and bribery.

Anti-money laundering

Suppliers and business partners must comply with applicable anti-money laundering and counter-terrorist financing laws. They must not engage in, support or facilitate money laundering, and must take reasonable steps to prevent their transactions from being used for illegal purposes.

Human Rights

Geminor respects internationally recognised human rights and conducts its business in line with relevant international standards, including the UN Guiding Principles on Business and Human Rights and applicable ILO conventions.

We expect all suppliers and business partners to respect fundamental human rights, promote decent working conditions and uphold responsible labour practices in their own operations and throughout their supply chains.

Suppliers must not use, support or benefit from any form of forced labour, bonded labour, human trafficking or child labour. Workers must be free to move during their employment and free to leave their employment in accordance with applicable laws and employment contracts.

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Suppliers must not retain workers' passports, identity documents or other personal documents, and must not use threats, coercion, intimidation or other forms of pressure to restrict workers' freedom.

Trade regulations and sanctions

Suppliers and business partners must comply with all applicable export, import, transit and trade laws, economic sanctions and restricted party regulations.

Suppliers and business partners must not engage in activities that would cause Geminor to breach applicable trade regulations or sanctions and must provide relevant information and documentation when requested.

Geminor may screen our business partners, suppliers and other parties against relevant restricted parties' lists before entering any business with them, as well as obtain and comply with necessary governmental licenses where cross-border export or import activity involves restricted items, technology or software.

Fair competition

Suppliers and business partners must comply with applicable competition and antitrust laws and must not engage in anti-competitive behaviour, such as price fixing, bid rigging, market sharing, exchange of commercially sensitive information, or abuse of market power.

Equality, Diversity, and Inclusivity

Suppliers and business partners must provide a workplace free from discrimination, harassment and unfair treatment.

Employees, job applicants and others must be treated with dignity and respect, regardless of gender, age, disability, ethnicity, religion or belief, sexual orientation, nationality, social background or any other protected characteristic under applicable law.

Environment

Suppliers and business partners must comply with all applicable environmental laws, permits, licences, approvals and contractual requirements. They are expected to work responsibly to minimise negative environmental impacts, including emissions, waste, pollution and resource use.

Suppliers must ensure that employees and subcontractors understand and follow relevant environmental requirements.

Where suppliers and business partners provide services related to waste handling, transport, treatment, recovery, disposal, import or export, these activities must be traceable, documented and carried out in accordance with applicable laws and regulations, including relevant rules on cross-border waste shipments.

Suppliers and business partners must hold and maintain all required permits, licences, approvals and certifications for the services they perform for Geminor.

Drugs and alcohol

Suppliers, subcontractors and business partners must not be under the influence of alcohol, illegal drugs or other substances that may affect their ability to work safely when performing work for Geminor.

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Alcohol or drug use is strictly prohibited when operating machinery, driving, handling waste, working on-site at Geminor premises or performing any safety-critical work.

Suppliers, subcontractors and business partners must comply with all applicable site rules and safety requirements when visiting Geminor premises, customer sites or other locations as part of their work for Geminor.

Personal data and privacy

Suppliers and business partners must comply with applicable data protection laws, including GDPR where relevant. Personal data must be handled securely, confidentially and only for lawful and necessary business purposes.

If a supplier or business partner processes personal data on behalf of Geminor, a data processing agreement must be in place.

Consequences of breach

Potential misconduct may be investigated, either by internal or external recourses. We will pursue remedial measures if you breach this Code of Conduct or applicable laws. Such remedial measures may involve termination of contract, as well as potential legal proceedings and/or reporting to relevant authorities.

The supplier's and business partners compliance with the content of this Code of Conduct is a contractual condition for Geminor, both at the time of entering into and during the entire duration of the contract.

The supplier and business partner must comply with this Code of Conduct throughout the contract. Serious breaches will be considered a significant violation, allowing Geminor to immediately terminate the business relationship. Such breaches include intentional actions and offenses against basic human rights like child labor, forced labor, hazardous work environments, and crimes against humanity such as war crimes and genocide.

If the supplier or business partner fails to meet any aspect of this requirement, they must promptly notify Geminor and provide an action plan for corrective measures. In certain cases, where the breaches are not repeated or severe, Geminor may assist the supplier in upholding the principles outlined in the code. However, in the case of repeated breaches, Geminor reserves the right to terminate the business relationship. If Geminor suspects that a supplier or sub-contractor has knowledge of or willingly engages in human rights violations, relevant authorities will be notified.