

# Code of conduct



<i>SEAM dokumentnummer: P14.01E</i>	<i>Dato:</i>	<i>Utarbeidet av:</i>	<i>Godkjent av:</i>
P1401E Code of Conduct-rev01	2021-09-02	BTK	CEO

Dokumentet er kontrollert kun i elektronisk utgave. Når det er skrevet ut er eier ansvarlig for at dokumenter er i siste og gyldige utgave.

## 1.0 Purpose

This document describes SEAM's code of conduct.

## 2.0 Scope

The procedure applies to entire SEAM AS

The procedure applies to all persons employed in or who otherwise represent SEAM internally and externally.

## 3.0 Definitions

N/A

## 4.0 Responsibility and authority

The General Manager is responsible for updating, communicating and implementing the guidelines set forth in this procedure.

## 5.0 Execution

### 5.1 General

SEAM's code of conduct describes in general the ethical principles according to which the company is governed, the way in which our business partners are to be treated and the behaviour that is expected of our employees.

The code of conduct should ensure that the company's management follows generally accepted standards and provides support to the employees in performance of tasks and in decisions and also ensures that activities are carried out in an ethical manner and in accordance with the normal standards and those set by SEAM.

### 5.2 Business ethics

SEAM sets absolute requirements regarding the employees' honesty and integrity in all matters concerning the company. All employees must keep up-to-date with and follow applicable statutes and regulations and carry out their work in accordance with the standards set forth in this document. In this way, we will help ensure SEAM's reputation and reduce the risk for both the company and individuals.

This implies that all employees must:

- Follow the company's policies, principles and regulations for business and always act in the company's best interests,
- Go actively in for honesty and integrity in all business activities,
- Avoid disclosing or misusing confidential information,
- Act impartially in all business matters and avoid giving any business connection an unfair advantage, use facts and existing contracts as a basis for settling disputes and disagreements,
- Not become involved in matters that may conflict with SEAM's interests, or which in any way could adversely affect ones freedom of action or independent judgment,
- Refuse any direct or indirect gift, payment, travel or other benefit, unless it is of insignificant or symbolic value or has been approved by a superior.

### 5.3 Relations with contractors, partners and customers

SEAM must manage their business so that contractors, partners and customers can have confidence in the company. Contractors and partners are expected to adhere to ethical standards that are generally accepted and in accordance with SEAM's ethical requirements.

### 5.4 Own behaviour

SEAM expects all employees to treat with courtesy and respect all colleagues and other people they come in contact with through work or work-related activities. SEAM employees must ensure that they do not offend local traditions and culture. Through their behaviour, the employees must help give the company a positive reputation.

Employees are expected to contribute toward a tidy, efficient and positive working environment and the company's results. Therefore, employees must perform their tasks satisfactorily and resist from all behaviour that may have a negative impact on colleagues or the working environment.

The object of the Norwegian Anti-discrimination Act is to promote equality, ensure equal opportunities and rights and to prevent discrimination on the grounds of ethnicity, skin colour, language, faith, gender and age. The company's intention is to promote the object of the Act in its business activities. The company also aims to be a workplace where there is no discrimination on the basis of disability. The company works to organize the physical conditions so that the company's various functions may be used by as many as possible.

### **5.5 Conflict of interest**

No one must work with or deal with matters where they themselves, their spouse, partner, close relations, or other persons with whom they have close relations, have direct or indirect personnel or financial interests.

Employees must report to their superior or person responsible for HR about current or possible matters where there may be a conflict of interest, as soon as they are aware of this.

### **5.6 Directorships, etc.**

SEAM is basically positive to employees undertaking directorships or other positions of trust in other businesses for financial purposes. Such positions and any other assignments must be approved beforehand by the General Manager or a person authorized by him.

Directorship in or assignments for competing businesses will not be approved.

### **5.7 Information and IT systems**

Information produced and stored in SEAM's systems will be regarded as the company's property. Therefore, SEAM reserves the right to access any such information, unless such right is limited by law or agreements.

Employees are responsible for taking care of electronic files and archiving these properly in the correct place in accordance with what has been agreed in each project. Private use is only allowed for processing ordinary information to a limited extent.

Information that may be regarded as illegal, offensive or inappropriate must under no circumstances be processed, downloaded or distributed. All downloading, storage or distribution that results in a breach of copyright law or regulations is prohibited. All use of software that results in a breach of copyright law or regulations is prohibited.

### **5.8 Duty of confidentiality**

All employees are responsible for ensuring that trade secrets or competitively sensitive information are not disclosed to unauthorized persons. Employees must keep confidential any matters that concern personal information and / or personal matters.

It is natural for employees to talk about their work and the company's activities with colleagues, family or friends. In general, this is not a problem, but some categories of information are strictly controlled and must be disclosed to anyone who does not need and is not entitled to know the information. Such information must only be published, internally or externally, by employees who are authorized to do so.

Employees must also consider where and how they talk about SEAM-related matters, so that they make sure that no unauthorized person has access to the information. The employee is obliged to maintain a duty of confidentiality even after employment in SEAM ends.

### **5.9 Political activities**

SEAM does not support any individual party or candidate. This neutral party-political attitude is part of the company's image. Each employee is free to participate in democratic political work, but then without reference or connections to their employment in SEAM.

### **5.10 Equality and diversity**

SEAM will show respect for all individuals and work actively to provide a good working environment that is characterized by equality and diversity.

SEAM does not accept any kind of discrimination against its employees or other persons who are involved in SEAM's activities. Discrimination includes all unfair treatment, exclusion or preference based on race, gender, age, handicap, sexual orientation, religion, political views, national or ethnic origin or similar factors, which mean that the equality principle is set aside or compromised.

### **5.11 Bribery and corruption**

No unlawful gifts of money or other inappropriate benefits must be offered to customers' employees, contractors or other business relations in order to achieve unlawful or commercial privileges.

### **5.12 Gifts, hospitality and expenses**

Employees in SEAM must neither give or receive gifts worth more than NOK 1 000. If not accepting a gift of a greater value is assumed cause a negative reaction, such gifts must be received and handed over immediately to HR. Gifts of such a value will be regarded as SEAM's property. Employees may accept hospitality in the form of social events, meals or entertainment, if this is clearly related to business. The cost of such hospitality must be kept within reason. Travel, overnight accommodation and other expenses for employees in connection with this type of hospitality must always be paid by SEAM. The above principles also apply vice versa.

### **5.13 Approval of contractors**

SEAM will only conduct business with other companies, people or units that conduct business in a way that is ethically acceptable to SEAM. No employee must enter into contracts with another party on behalf of SEAM before this party has been cleared through the applicable rules for approval of contractors. In addition, employees must:

- Avoid business activities with a contractor, business relation or other third party that may expose SEAM to criminal or other liability, or that may damage the company's reputation.
- Ensure that an appropriate examination has been made before SEAM enters into a contract with a contractor, business connection, agent or other third party.
- Not allow a third party who is acting on our behalf to do something that we ourselves do not have permission to do.

Contact your superior if you become aware that one of SEAM's contractors is acting unethically or in violation of application laws and regulations.

### **5.14 Purchase of sexual services**

Human trafficking is illegal and a breach of human rights. Purchase of sexual services can be regarded as human trafficking. Employees are prohibited from buying sexual services in connection with work or business travel for SEAM.

### **5.15 Consequences of violation**

Breach of the company's policy or applicable laws may result in disciplinary action or the matter being reported to the relevant authority. The scope of the reaction will be adjusted to the severity of the offence.

Employees who offer, pay, demand or accept bribes will be dismissed or given their notice. The matter will also be pursued in a court of law if they are of such a nature that dictates such treatment.

### **5.16 Approval of the code of conduct**

Document P14.01E "Code of Conduct for SEAM" has been approved by the board (*date*)