

Our Ethical Guidelines

1. To whom these guidelines apply

These ethical guidelines apply to all managers and employees in the companies that have agreed to use the "Common management system", developed by **ØB Group AS**. When the term "*Company*" is used below, this includes the aforementioned companies within ØB Group and Nordic Concrete Group.

2. Introduction

The need for business actors to comply with basic ethical principles is constantly highlighted. Our cooperation with suppliers, customers and other stakeholders must be based on fairness, openness and good communication.

Our business must be an ethically responsible business. The *company's* reputation is created by the behaviour of the individual employee. All employees are therefore obliged to familiarize themselves carefully with the guidelines and comply with them in practice.

Managers are responsible for making the guidelines known, and for following up that they are complied with. Within particularly exposed business areas, the responsible managers must assess the need for further clarification in the form of supplementary guidelines.

All employees must be made aware of the *Company's* values and use them as a basis for their work. They act professionally and with care, honesty and objectivity. Employees must refrain from actions that could undermine trust in the *Company*.

3. Basic Expectations

Regardless of where they carry out their work, the *Company*, its managers and employees must comply with applicable laws and regulations, contractual obligations, basic human rights, as well as the requirements arising from good business practice and recognized norms for personal conduct.

The *company* emphasizes maintaining safe and decent working conditions both in its own operations, and by prioritizing the use of suppliers who follow corresponding guidelines.

4. Health, safety and well-being

We care about our employees and the people affected by the work we do. We constantly strive to develop a working environment that promotes health, safety and well-being.

The *company* must work systematically to safeguard the employees' health, working environment and safety in line with current laws and regulations. Necessary measures must be taken to prevent and minimize accidents and health damage as a result of, or related to, conditions at the workplace. Workers must have regular and documented training in health and safety. Personal protective equipment must always be available and used. Hazardous chemicals and other substances must be handled properly.

All workers must have access to satisfactory sanitary facilities and clean drinking water. If relevant, the employer must also ensure access to facilities for the safe storage of food. In cases where the *Company* offers accommodation, e.g., in connection with projects, this must be clean, safe, adequately ventilated and with access to clean sanitary facilities and clean drinking water.

The *company's* managers and employees must register, process and follow up on all health, environment and safety-related incidents in the *company*, on projects where we carry out assignments, and in the workplaces.

5. Orderly working conditions

The *company* supports the basic human rights and orderly working conditions for everyone who works in the *company*, at our workplaces and in our supply chain. We have zero tolerance for child labour, human trafficking and forced labour.

We also do not allow any practices by our subcontractors that prevent the free movement of labour. (incl. practice may include requirements for employees to hand over ID documents, passports or work permits as a condition for employment).

The *company* and our subcontractors must ensure that employees have reasonable working hours, pay conditions and benefits that are in accordance with current legislation and the relevant ILO conventions, as well as respect employees' right to organize themselves in voluntary employee organizations and enter into collective negotiations.

6. Discrimination

The *company* respects all individuals and strives to work as a team and promote open and honest communication characterized by respect. We treat everyone equally and provide equal opportunities, and we do not tolerate any form of harassment or discrimination. No one shall be unlawfully or unreasonably discriminated against because of sex, age, religion, political opinion, race, skin colour, national origin, ethnic origin, orientation or cohabitation.

7. Personal conduct

All our managers and employees must contribute to a good working environment characterized by equality, diversity, openness and tolerance. Regardless of where they carry out their work, the *Company's* managers and employees must comply with applicable laws and regulations. No form of harassment, discrimination or other inappropriate behaviour towards colleagues or others you deal with as an employee is accepted.

Managers and other employees must act with trust and respect for business relations, colleagues and others with whom the person comes into contact in connection with their work. The *company* does not accept harassment or other behaviour that can be perceived as threatening or degrading.

8. Drugs

It is not accepted that employees show up to work under the influence of alcohol or other legal or illegal drugs. Necessary use of medication that is likely to impair concentration or judgement, employees must inform their superior and not carry out work operations where the use of medication will lead to increased risk.

9. Integrity and impartiality

Sensitive or confidential information to which employees have access must not be passed on to external parties without management's approval. This also applies after the end of employment.

An employee must not deal with a case or seek to influence a decision if there are special circumstances which are likely to undermine confidence in the person concerned's independence.

We respect confidential information concerning our customers, suppliers and other stakeholders, and take all necessary measures to prevent confidential information from being disclosed to persons who do not need or have the right to the information in connection with their work.

10. Protection of personal data

The *company* respects everyone's right to protection of their personal data and the right to integrity.

The *company* and its suppliers must respect the privacy of employees and third parties and must ensure that all use of personal data - such as collection, registration, comparison, storage and deletion, or a combination of these things - takes place in accordance with applicable laws and regulations.

11. Work against corruption and bribery

The *company* emphasizes a high degree of integrity in its business operations, and we do not tolerate any form of bribery or corruption. This includes embezzlement, money laundering, extortion, fraud and favouring family or friends.

The *company* is against corruption and works to prevent this from occurring. Employees shall not, in their contacts with others, receive or seek to obtain advantages for themselves or close persons, which are inappropriate, or which can otherwise be thought to harm the *Company's* interests or reputation. This involves refraining from offering, soliciting, accepting or receiving any form of undue advantage, favour or incentive for the purpose of obtaining personal or business advantage. This applies regardless of whether this benefit is offered directly or indirectly through an intermediary.

In the *Company*, we do not accept or offer benefits or gifts that may improperly influence - or give the impression of influencing - our business decisions or the business decisions of others with whom we work.

We also emphasize that our subcontractors do not offer or accept benefits or gifts that can unfairly influence - or give the impression of influencing - business decisions. If our employees experience such an impact, this must be reported to the *Company's* management.

12. Procurement

When purchasing goods and services for the *Company*, assessments must be made of the supplier's relationship with the environment, child labour, undeclared work and the possible use of underpaid labour, and further whether the supplier has and follows its own ethical guidelines. The *company* must strive to choose suppliers who have a high ethical standard in these areas.

13. The relationship with the external environment

The *company* is committed to protecting the environment and believes that we can make a major contribution to a more sustainable world. We work actively to improve the environmental results of the *Company*, the projects, the products and the services throughout their entire life cycle. The aim is to be able to manufacture sustainable products with little climate impact, which are traceable throughout the supply chain. The *company* therefore prioritizes suppliers who work actively and systematically with sustainability and continuously work to reduce energy consumption and waste, as well as demonstrate social responsibility in the choice of materials and in nature interventions.

We expect our suppliers to comply with national and international environmental legislation and regulations. In addition, suppliers should promote a responsible environmental policy and contribute to the development and use of environmentally friendly technology, including minimizing their emissions and developing their environmental and climate commitment.

Our suppliers must have a precautionary approach to environmental challenges. This means avoiding significant damage to nature and the environment when decisions are made. Assessment of the risk of environmental impact must be included in the project implementation, and if there is a risk of serious environmental damage, measures must always be taken to prevent environmental damage.

14. Board positions, side jobs, paid assignments

Employees who receive board positions, side jobs or paid assignments outside the *Company* must inform their immediate superiors in the *Company* about this. Board positions in other companies (competitors, customers or suppliers) must also be cleared with the general manager.

Employees who have been elected to political office, or appointed to public councils and committees, receive remuneration according to current public rules. In accordance with the law, they are entitled to time off to participate in meetings associated with political office.

15. Relations with the media

The *company* must be an open, accessible and compliant organisation. This is best ensured by a consistent and coordinated behaviour towards the outside world. Information that is given to the media or the general public, and that is related to the *Company* or assignments in which the *Company* is involved, must be cleared with the general manager or with the person assigned this responsibility.

In the event of accidents and the like, only the general manager or the person he authorizes must speak to the press. Information or photos from the accident must not be posted on the internet / social media, without the approval of the general manager.

16. Internet and social media

Employees must not post information or information about the *Company* on the internet / social media, which could reveal confidential information or put the *Company* or colleagues in a bad light.

In the event of accidents at work, with or without personal injury, it is not permitted for employees to post pictures of the incident on the internet or social media, without this being approved by the general manager or the person he gives authority to assess such information. This is important so that relatives, colleagues and others are informed about the accident first and in the correct way.

The *company* has guidelines for how relatives, colleagues, authorities etc. should be informed and who should do this. Information must be provided in accordance with these guidelines.

17. Ethics in international business

When dealing with other cultures, situations may arise that require awareness of the *company's* ethical guidelines. Clear driving rules are important for employees to behave correctly and politely in other cultures, while at the same time maintaining their own and the *company's* integrity. Examples of such situations are other cultures' views on "lubrication", gifts, attitudes towards women, use of alcohol, etc.

A good approach to the challenges of ethics and cultural differences is to follow the ethics you know from Norway. If this is experienced as difficult for the individual, for example if you feel that you might offend others, you can refer to the *company's* guidelines in this area. If you are obviously at risk of breaking established rules or strong norms in the other culture, you must use discretion, and it is a good rule that you then raise doubtful situations with your superior.

18. Violations

The guidelines apply to all employees, whether they are employed or hired by the *Company* for a limited or longer period of time. Employees who violate these guidelines must expect reactions from the *company*.

These guidelines have been processed and approved by the company's board in autumn 2022.