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# Code of Conduct for Veidekke's suppliers

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## Introduction

Veidekke's cooperation with its suppliers shall be based on fairness, transparency and good communication. Mutual respect is an essential condition for good partnerships.

This Code of Conduct applies to suppliers of goods and services, including subcontractors, service providers, consultants, intermediaries and agents. Veidekke's suppliers must ensure that all rules and principles described in this Code of Conduct apply in their own supply chain. At Veidekke's request, the supplier must document how this is managed.

## Health, safety and well-being

We care about our employees and the people who are affected by the work we carry out on our projects, and we constantly strive to develop a work environment that promotes health, safety and well-being.

Suppliers must work systematically to safeguard the employees' health, working environment and safety in compliance with applicable statutes and regulations. Necessary measures must be implemented to prevent and minimise accidents and health injuries as a consequence of, or in relation to, conditions at the workplace. Workers must have regular and documented health and safety training. Personal protective equipment must always be available and used. Hazardous chemicals and other substances must be properly handled.

All workers must have access to clean sanitary facilities and clean drinking water. If applicable, the employer must also ensure access to facilities for safe storage of food. If the employer offers accommodation, this must be clean, safe, adequately ventilated and with access to clean sanitary facilities and clean drinking water.

Suppliers must without undue delay report to Veidekke all health and safety-related incidents at our projects and at the workplace.

## Proper working conditions

Veidekke supports the basic human rights and proper working conditions for everyone who works on our projects, at our workplaces and in our supply chain. Veidekke has zero tolerance for child labour, human trafficking and forced labour, including the practice of illegal or unlawful withholding of salary.

We allow no practices that prevent the free movement of labour. Such practices may include requirements that employees must submit ID documents, passports or work permits as a condition to gain employment.

Suppliers must ensure that employees have reasonable working hours, wage conditions and benefits that are in compliance with applicable regulations and relevant ILO conventions, and respect employees' right to organise in voluntary employee organisations and enter into collective bargaining agreements.

## No discrimination or harassment

Veidekke respects all individuals and strives to work as a team and promote open and honest communication characterised by respect. We treat everyone equally and provide equal opportunities, and we tolerate no forms of harassment or discrimination.

Suppliers must promote equal opportunities for all, regardless of gender, gender identity and expression, sexual orientation, ethnic background, religion, disability or age, and contribute to a working environment without hostile, violent, threatening or harassing conduct.

Actions that reasonably can be perceived as offensive or intimidating, including any form of unwanted attention of a sexual nature, are unacceptable.

## Environment

We are committed to protecting the environment and believe that we can make a significant contribution to a more sustainable world. We actively work to improve environmental results in Veidekke, projects, products and services throughout the life cycle. The goal is to be able to produce sustainable products with little impact on the climate, that are traceable throughout the supply chain. Veidekke gives priority to suppliers who actively and systematically work with sustainability and continuously work to reduce energy consumption and waste, and who demonstrate corporate social responsibility in their choice of materials and in the event of interventions in nature.



Our suppliers must comply with domestic and international environmental legislation and regulations, and must obtain the required emission permits. In addition, the suppliers should promote a responsible environmental policy and contribute to developing and using environmentally friendly technology, including minimising their emissions and developing their environmental and climate efforts.

Our suppliers must take a precautionary approach to environmental challenges. This means avoiding significant harm to nature and the environment when decisions are made. An assessment of the risk of environmental impact must be included in the project implementation, and if there is a risk of serious harm to the environment, measures must always be implemented to prevent this.

## Protection of assets, property and equipment

We protect our assets from damage, theft and misuse, because they are essential to Veidekke. Assets are both tangible and intangible. Examples of tangible assets are raw materials, funds, products, computers, real estate, machinery and equipment. Examples of intangible assets are patents, trademarks, know-how, trade secrets and copyrights.

Our suppliers must respect Veidekke's assets and stakeholders.

## Confidentiality

We respect confidential information that concerns Veidekke and our stakeholders, and take all necessary measures to prevent that confidential information is disclosed to persons who don't need or are not entitled to the information in connection with their work.

Our suppliers must protect confidential information they are given access to by Veidekke, our customers and others. This also entails that our suppliers do not act on the basis of confidential information they have received erroneously. Such cases must be reported to Veidekke.

## Protection of personal data

Veidekke respects everyone's right to the protection of their personal data and the right to integrity.

Our 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 – takes place in accordance with applicable statutes and regulations. If the supplier also processes personal data on behalf of Veidekke, a separate data processing agreement must be established and complied with in accordance with the GDPR prior to this processing.

## Work against corruption and bribery

Veidekke's business operations are conducted with a high level of integrity, and there is zero tolerance for all forms of bribery or corruption. This includes embezzlement, money laundering, extortion, fraud and favouritism of family and friends (nepotism).

Our suppliers must adhere to statutes and regulations relating to bribery, corruption, fraud and all other illegal business activity. The suppliers must not offer, demand, accept or receive any form of undue benefit, service or incentive with the purpose of gaining personal or business benefit. This applies regardless of whether this benefit is offered directly or indirectly through an intermediary.

All invoices, reports and documents must be complete and accurate.

## Benefits and gifts

In Veidekke we do not accept or offer benefits or gifts that unduly may affect – or give the impression of affecting our business decisions or the business decisions of others with whom we cooperate.

Our suppliers do not offer and must not accept benefits or gifts that unduly may affect – or give the impression of affecting – business decisions. If employees of Veidekke request any form of benefit, gift or personal service free or at a lower cost than the market rate, this must be reported to Veidekke.

## Fair competition

Open competition is in the best interest of Veidekke, our stakeholders and society at large. It stimulates efficiency and innovation, which is the foundation of a well-functioning market economy. Veidekke is committed to fair competition and tolerates no breaches of competition law.

Our suppliers must practice fair competition. Among other things, this entails a ban on tender cooperation where one refrains from submitting a tender, or submits fictitious tenders, rotates bidding or similar mechanisms to restrict fair tender competitions. Suppliers must not engage in any form of cartel activities with competitors, such as allocation of quotas or sharing of markets or customers or price cooperation.

## Conflicts of interest

Veidekke strives to operate in a manner where we actively avoid conflicts of interest, and we demand the same in the supply chain. Conflicts of interest can originate from benefits such as travel and entertainment, gift, charitable gifts, political contributions, sponsoring and close relations.

Our suppliers must never attempt to influence the processing or decision of a case if there are conditions, factors or circumstances (business-related, private, financial or otherwise) that can lead to a potential or actual conflict of interest.

Veidekke must be notified if the supplier becomes aware of an actual or perceived conflict of interest in its work for Veidekke.

## Sanctions

Suppliers shall not have business or dealings with a sanctioned country, group, organization or individual.

## Violations of the Code of Conduct

Violations of this Code of Conduct may impact your business relationship with Veidekke. Possible consequences include, but are not limited to, termination of the contract.

If you discover a violation of this Code of Conduct, this must be rectified immediately and reported to your contact at Veidekke or via Veidekke's whistleblowing channel on our website.



**Veidekke ASA**  
Skabos vei 4  
Postboks 505 Skøyen  
0214 Oslo, Norway

