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# 1. Purpose of our Code of Conduct

We strive to have high business ethics and act according to our values. Our Code of Conduct (“CoC”) sets out rules and provides guidance on responsible business conduct. It is aligned with our values and based on the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the Norwegian Transparency Act (Åpenhetsloven) and the UN Guiding Principles on Business and Human Rights.

The CoC applies to all employees, board members, and any person acting on behalf of NBSAS. Any person who violates this CoC may be subject to disciplinary action.

## How the CoC should be applied

The CoC does not replace the law or any existing policies within Norsk Bildelsenter AS (NBSAS). We acknowledge that the CoC is not exhaustive and that its content may change over time.

Whenever you find a situation where the CoC does not provide you with sufficient guidance, consider the following questions:

1. Is this in line with our values, CoC, and other policies?
2. Is this legal?
3. Is this considered to be fair and ethical?
4. Would I be comfortable if this was made public internally or externally?

If the answer to any of these questions is no, or if you are in any doubts, consult with an appropriate person (your manager) before taking any further actions.

## 2. We do business with high integrity

### Anti-corruption & Anti-bribery

NBSAS has zero tolerance for all forms of corruption and bribery, including facilitation payments, and works actively to prevent all such actions. We define corruption as the offering, giving, receiving, or requesting anything of value to influence, directly or indirectly, officials or private parties for an improper purpose, including to obtain an improper advantage. Therefore, we give and accept gifts or entertainment in a lawful manner, and only as an appropriate complement to a legitimate business relationship. For Anti-corruption and bribery policy & Gift and entertainment policy, see NBS Personelhåndbok, sections; 10 and 5.

### Compliance with laws and regulations

We comply with all applicable laws and regulations in the jurisdictions we operate and do business. Where local laws impose higher standards than those set out in this CoC, local laws shall apply. In addition, NBSAS shall respect all tax laws in the markets we operate. For Norway, see Norwegian Tax Law.

### Conflict of interest

We must always make decisions based on NBSAS` best interest and avoid conflicting interests. A conflict of interest is when your private interests, personal relationships, or activities outside NBSAS` influence, or appear to influence, your ability to make an objective decision.

## Applicable principles of the UN Global Compact

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### How we act

#### Anti-corruption & Anti-bribery

- If you become aware of any action that might be contrary to our zero-tolerance policy, immediately report this to your manager or another appropriate person.
- Never, directly or indirectly, give, offer, or promise anything of value to a third party to obtain an improper advantage.
- Never accept or request anything of value from a third party that might lead you to act illegally, unethically, or violate this CoC.
- Never offer or accept gifts and entertainment unless they are clearly of symbolic value.
- Never make facilitation payments to public officials to speed up bureaucratic processes.
- Never use intermediaries to obtain any advantage that might be interpreted as corruption.

#### Compliance with laws and regulations

- Comply with all applicable laws and regulation wherever we operate and do business.
- Operate the business through a commercial approach rather than a tax-driven one.

#### Conflict of interest

- Report any potential conflicts of interest to your manager or another appropriate person as soon as you become aware of them.

## Fair competition

NBSAS will always compete in a fair manner and in compliance with all competition laws, also called antitrust laws. These laws are generally about prohibiting agreements between competitors that limit competition, such as price fixing and cartel behavior.

## Financial and business records & Anti-money laundering

NBSAS is committed to apply high quality standards for accounting and ensure that all financial and non-financial records are accurate and complete. We are against all forms of money laundering and comply with applicable anti-money laundering laws.

## Privacy & Personal data

We are committed to respect and protect the privacy of all our stakeholders. We collect, process, and store personal data only for legitimate business purposes and always in accordance with applicable laws. NBSAS defines personal data as any information of a person that can be used to, directly or indirectly, identify the person. For customers, see; Personvernerklæring on [www.bildeler.no](http://www.bildeler.no)

## Political involvement

NBSAS is politically neutral and does not make donations to political parties or candidates. Our company name shall not be used in political campaigns or to promote interests of political parties.

## Responsible marketing

We strive to help our customers to make informed decision by providing accurate and clear information. NBSAS shall always act in accordance with fair marketing practices and seek to promote sustainable consumption. In addition, we take every reasonable step to ensure the quality and reliability of our products.

## Applicable principles of the UN Global Compact

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### How we act

#### Fair competition

- Never collect competitive information through illegal or unethical means.
- Be cautious when engaging with competitors and never discuss confidential information.

#### Records & Anti-money laundering

- Provide transparent, reliable, and accurate information to applicable stakeholders.
- Properly record all financial transactions in a non-misleading manner.
- Ensure that NBSAS financial transactions and business activities are not used to launder money.

#### Privacy & Personal data

- Never collect personal data without the consent of the person concerned or only if the law requires it.
- Only collect the personal data that is necessary for the business purpose.
- Make sure to always store personal data securely.

#### Political involvement

- Never use NBSAS assets or services to support any political party or candidate.
- Always make clear that any expressed political view is your personal one.

#### Responsible marketing

- Ensure that all promotional materials provide a fair and truthful description of our products.
- Always report any potential concerns about product safety or quality issues to your manager or another appropriate person.

## Use of assets & Confidential information

NBSAS assets must be safeguarded in an appropriate manner. We shall use our assets with sound judgment to ensure they are not stolen, lost, wasted, misused. Confidential information is to be considered as a valuable asset that we must proactively protect from loss and inappropriate disclosure. We define confidential information as business-related information, written or oral, that is not public.

## Applicable principles of the UN Global Compact

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### How we act

#### Use of assets & Confidential information

- Never use **NBSAS** assets to engage in illegal or inappropriate activities.
- Before sharing internal information to any third party, ensure that you have the right to communicate and, if necessary, confidential agreements in place.
- Make sure to always store confidential information securely.

# 3. We care about our people

## Diversity & Inclusion

We believe that a diverse and inclusive workplace brings business benefits in terms of higher level of innovation, better decision-making, and improved financial performance. Therefore, NBSAS promotes integration of people who are underrepresented in our organization and strictly prohibits discrimination based on gender, age, sexual orientation, nationality, religion, ethnic background, political opinion, union affiliation, or disability.

## Health & Safety

NBSAS provides a healthy and safe working environment where everyone is treated with dignity and respect, while harassment, discrimination, and other inappropriate behavior is not tolerated. We shall comply with applicable laws and follow national and international standards in relation to occupational health and safety.

See NBSAS HMS Scorecard and NBSAS Risk Assessment Matrix.

## Human rights & Labor conditions

NBSAS respects and actively supports internationally proclaimed human rights, including, but not limited to, those expressed in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We do not tolerate, in any form, child labor or forced labor, including slavery and human trafficking. In addition, we respect and support the freedom of association and the right of employees to decide whether they want to bargain collectively or individually.

See NBSAS Personalthåndbok, Section 9.

## Applicable principles of the UN Global Compact

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.

**Principle 2:** Businesses should make sure that they are not complicit in human rights abuses.

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principle 4:** Businesses should uphold the elimination of all forms of forced and compulsory labor.

**Principle 5:** Businesses should uphold the effective abolition of child labor.

**Principle 6:** Businesses should uphold the elimination of discrimination in respect of employment and occupation.

## How we act

### Diversity & Inclusion

- Treat all people with respect and embrace diversity and inclusion.
- Base your decisions on objective criteria and qualifications.

### Health & Safety

- Take every reasonable action to maintain a healthy and safe workplace, and report on any unsafe working conditions you may come across.
- Treat your colleagues that way you would like them to treat you, and never hurt, harass, or discriminate anyone.

### Human rights & Labor conditions

- Never violate or engage in activities that may violate human rights.
- Respect the right of employees to form or join a trade union.

## 4. We respect the planet

### Environmental responsibility

NBSAS is committed to take environmental responsibility and to continuously reduce its, direct and indirect, environmental impact. We encourage our employees to take their own initiatives and participate in industry-wide initiatives aimed at creating positive environmental outcomes. Our business should be operated with a long-term perspective and aligned with international environmental agreements, such as the Paris Agreements and the 2030 Agenda for Sustainable Development. In addition, we shall comply with all relevant environmental laws and regulations wherever we operate.

### Responsible purchasing

We are committed to creating positive outcomes in our supply chain through responsible purchasing practices. We strive to build business relationships that help us reduce our environmental impact and where human rights are recognized and respected. See *NBSAS Supplier Code of Conduct*

### Applicable principles of the UN Global Compact

**Principle 7:** Businesses should support a precautionary approach to environmental challenges.

**Principle 8:** Businesses should undertake initiatives to promote greater environmental responsibility.

**Principle 9:** Businesses should encourage the development and diffusion of environmentally friendly technologies.

### How we act

#### Environmental responsibility

- Be aware of **NBSAS** environmental impacts relevant to your position and take every opportunity to reduce these.
- Report immediately to your manager or another appropriate person if you become aware of any action that might lead to serious environmental damage.

#### Responsible purchasing

- Favour sustainable alternatives when purchasing products and services.
- Build relationships that promote sustainable business practices.

# 5. Speak up!

NBSAS strives to maintain a transparent business culture and encourage all our employees to report suspected violations of laws, the CoC, or any other misconduct. You will always be protected from all forms of retaliation as long as you report in good faith. Any employee who retaliates against another employee for reporting misconduct may be subject to disciplinary action.

You can contact your manager or another appropriate person to report suspected misconduct.

## How we act

- Help **NBSAS** to maintain a transparent business culture and to address potential issues by reporting if you become aware of any suspected misconduct.
- Never reporting knowingly false allegations.