

Imenco Management System - Global

# **SUPPLIERS CODE OF CONDUCT FOR CORPORATE RESPONSIBILITY**

Document Title: **SUPPLIERS CODE OF CONDUCT FOR CORPORATE RESPONSIBILITY**

Document Number: IGL-PD-103

The online version of this document is “controlled” and valid at all times.  
Printed and/or downloaded copy is “uncontrolled” and for information only.



## CODE OF CONDUCT

---

Index:

<b>1</b>	<b>OBJECT AND PURPOSE .....</b>	<b>2</b>
<b>2</b>	<b>SCOPE.....</b>	<b>2</b>
<b>3</b>	<b>RESPONSIBILITY.....</b>	<b>2</b>
<b>4</b>	<b>HUMAN RIGHTS .....</b>	<b>3</b>
<b>5</b>	<b>FORCED LABOUR .....</b>	<b>3</b>
<b>6</b>	<b>TRADE UNION AND RIGHT TO COLLECTIVE BARGAIN .....</b>	<b>3</b>
<b>7</b>	<b>CHILD LABOUR.....</b>	<b>3</b>
<b>8</b>	<b>NON-DISCRIMINATION .....</b>	<b>3</b>
<b>9</b>	<b>SAFETY, HEALTH AND WORKING ENVIRONMENT .....</b>	<b>3</b>
<b>10</b>	<b>WAGES .....</b>	<b>4</b>
<b>11</b>	<b>WORKING HOURS .....</b>	<b>4</b>
<b>12</b>	<b>EMPLOYMENT CONTRACT .....</b>	<b>4</b>
<b>13</b>	<b>ENVIRONMENT .....</b>	<b>4</b>
<b>14</b>	<b>CORPORATE GOVERNANCE AND INTEGRITY MANAGEMENT.....</b>	<b>4</b>
<b>15</b>	<b>CONFLICT MINERALS.....</b>	<b>5</b>

---

### 1 OBJECT AND PURPOSE

The object of this Code of Conduct is to state the requirements to how suppliers should maintain an ethical and fair approach to the way they carry out their businesses; the suppliers standard of “Business Ethics and Corporate Social Responsibility”. This document describes Imenco’s expected minimum standard to be followed by suppliers. If local laws and this document address the same subject consistent with applicable local laws, then the highest standard shall be applied.

### 2 SCOPE

The requirements in this document are derived from the Ten Principles of the United Nations Global Compact and the ILO Conventions (International Labour Organization’s Declaration on Fundamental Principles and Rights at Work). Requirements are also derived from the U.S. Government “Dodd-Frank Act” for Conflict Minerals. For multinational Enterprises the OECD Guidelines will apply (reference to The Norwegian Transparency act)

### 3 RESPONSIBILITY

Imenco expects all suppliers to comply with applicable local laws in addition to follow this standard for Code of conduct. We also expect that that all sub-suppliers follow these principles of codes of conduct.



## CODE OF CONDUCT

---

### **4 HUMAN RIGHTS**

The Supplier shall respect internationally proclaimed human rights (Ref. ILO conventions) and shall avoid that human rights are abused of any kind. The Supplier shall respect the personal dignity, privacy and rights of each individual.

### **5 FORCED LABOUR**

The supplier shall not practice any form of forced or compulsory labour or debt bonded labour. Workers shall not be required to lodge deposits of money, identity papers or similar at the employers' possessions. The employee shall be free to leave their employment/ work with reasonable notice. The Supplier shall ensure that the work relationship between the Worker and Supplier is freely chosen and free from threats.

### **6 TRADE UNION AND RIGHT TO COLLECTIVE BARGAIN**

The Supplier shall ensure and recognize the Workers right to establish or join a trade union, and the right of using collective bargaining.

The Supplier shall not discriminate against Worker's representatives or members of trade unions or prevent them from carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining are restricted under national law, the Supplier shall allow Workers to freely elect their own representatives.

### **7 CHILD LABOUR**

The Supplier shall not employ children; this means anyone under 15 years of age, under 14 years of age if in compliance with national or local law or acceptable under the ILO Convention C 138.

If any child is found working at the premises of the Supplier, immediately steps shall be taken to ensure arrangement for the child to access education, and possible work arrangements in accordance with the best interests of the child.

The Supplier shall secure that persons under the age of 18 do not perform any hazardous work including night hour, or any work where the child is unreasonably confined to the premises of the Supplier. Working hours for persons under 18 years of age shall be so arranged that they do not interfere with their schooling or prevent them from benefiting from their lessons.

### **8 NON-DISCRIMINATION**

The Supplier shall prohibit direct or indirect negative discrimination based on race, colour, sex, sexual orientation, language, religion, political opinion, national or social origin, tribe or trade union membership status, and shall promote equality of opportunity or treatment in employment and occupation. The Supplier shall prohibit and establish protection against, any unacceptable or degrading treatment of workers. This includes mental cruelty, sexual harassment, or discrimination gestures. It also includes language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

### **9 SAFETY, HEALTH AND WORKING ENVIRONMENT**

Supplier shall secure and provide Workers with a safe and healthy working environment. Necessary measures to be implemented to prevent accidents and health damage resulting from or related to the conditions in the workplace.

Workers shall receive regular and documented training in the health and safety. Health and safety training shall be repeated for new employees. When it is necessary, workers shall be instructed to use appropriate personal protective equipment.



## CODE OF CONDUCT

---

Workers should have access to clean sanitation facilities and clean drinking water. If relevant to work, Supplier shall also provide access to facilities for health safe storage of food.

Where Supplier provides employees accommodation, this shall be clean, safe and adequately ventilated and with access to clean sanitation facilities and clean drinking water and, where appropriate, for their families.

### 10 WAGES

Wages of Workers should at least be in line with national minimum wage regulations or industry standards and always sufficient to cover basic needs.

Wage conditions and payment of wages shall be in written contract before work commences. Agreement should be understandable to the worker.

### 11 WORKING HOURS

Working hours shall be in accordance with national laws or industry standards, and not exceed maximum allowed working hours in accordance to applicable international conventions. It is recommended that working hours per week does not exceed 48 hours (8 hours per day).

Workers shall have at least 1 day off per week.

Overtime will be limited. The recommended maximum use of overtime is 12 hours per week per worker.

Workers should always have overtime pay, and at least in line with current laws.

### 12 EMPLOYMENT CONTRACT

Employer's obligation to the workers follows in line with international conventions and/ or national laws.

Workers are entitled to an employment contract in a language they understand.

Apprentice Program shall be clearly defined with regard to the duration and content.

### 13 ENVIRONMENT

The Supplier shall take a precautionary approach towards environmental challenges, undertake initiatives to promote greater environmental responsibility, and contribute to the development and diffusion of environmentally friendly technologies.

The Supplier shall act in accordance with relevant local and internationally recognised environmental standards.

The Supplier shall minimise its environmental impact and continuously improve its environmental performance.

### 14 CORPORATE GOVERNANCE AND INTEGRITY MANAGEMENT

The Supplier shall comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices. Supplier must maintain high ethical standards and good business practice. Governing Law and other legal provisions and agreements shall be followed.

The Supplier shall not, directly or via an intermediary, offer, promise or give any undue advantage, favour or incentive to any public official, international organisation or any other third party. Such incentives/ favours may for example be cash, goods, travel or services of other kinds.

The Supplier shall under no circumstances cause or be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behaviour that is in breach of relevant competition laws.



## CODE OF CONDUCT

---

### 15 CONFLICT MINERALS

Conflict Minerals refers to minerals mined in the eastern provinces of the Democratic Republic of Congo (DRC) and in the adjoining countries. Revenues in these countries may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. For this reason, U.S. Government signed the “Dodd-Frank Act” in 2010. This act requires all US stock listed companies and their suppliers to file reports related to the use of Conflict Minerals (Tin, Tantalum, Tungsten and Gold = 3TG) in their products. It is Imenco’s policy to comply with the rules under the Dodd-Frank Act and will take due diligence within our supply chain to assure the metal sources of the 3TG are not derived from mining in DRC.

- Imenco AS expects all suppliers to source materials from socially responsible suppliers.
- Imenco AS expects its suppliers to fully comply with the Conflict Minerals Law and provide all necessary declarations.
- Suppliers must flow down these requirements through their supply chain and determine the source of specified minerals, including 3TG.

Binding signature:

---

*Company/Supplier name*

---

*Supplier sign.*

---

*Date*

Approved by Senior Management 2023