Code of Conduct

Eurosko Gruppen AS



Introduction

Eurosko Gruppen AS requires all suppliers and business partners to comply with our standards for responsible working conditions, human rights and environmental practices throughout the supply chain We cooperate closely with our suppliers and business partners in pursuit of this aim. Accordingly, we have prepared this code of conduct to illustrate what we expect of our suppliers and business partners. The code of conduct covers human rights, workers' rights, the environment and corruption.

Eurosko Gruppen AS is a member of the Ethical Trading Initiative Norway (IEH), a membership organisation for private and public enterprises and organisations. IEH is a resource centre and an advocate for ethical trade practices. Eurosko Gruppen AS reports annually to IEH. This report is made publicly available: https://www.eurosko.com/no/barekraft/miljo/vare-policyer

Eurosko Gruppen AS aims to continuously improve policy and practice that supports suppliers in complying with this code of conduct.

Principles

Eurosko Gruppen AS suppliers are to supply goods and services that are produced in compliance with the code of conduct. Moreover, the suppliers are to communicate the code of conduct to their subsuppliers, and to monitor implementation.

A supplier must be able to document compliance with the code of conduct at Eurosko Gruppen AS request. Such documentation may take the form of selfdeclaration, follow-up meetings, and/or inspections of the working conditions at production sites. The supplier will be obliged to name and provide contact information for any sub-supplier that Eurosko Gruppen AS wishes to inspect.

In the event of a breach of the code of conduct, Eurosko Gruppen AS and the supplier will jointly prepare a plan for remedying the breach. Remediation must take place within a reasonable period of time. The contract will only be terminated if the supplier remains unwilling to remedy the breach following repeated enquiries.

Eurosko Gruppen AS Ethical Trade Principles are founded on key UN and International Labour Organization conventions and documents. National laws shall be respected, and where the provisions of law and Eurosko Gruppen AS ethical trade principles address the same subject, the most stringent shall apply.

1 Forced and compulsory labour

(ILO Conventions No. 29 and 105)

1.1 There shall be no forced or compulsory labour.

1.2 Workers shall not be required to lodge deposits or identity papers with their employer.

1.3 Terms of contract shall be fully communicated to and understood by workers and workers are free to leave the employer after reasonable notice.

1.4 Employee loan or credit schemes managed directly or indirectly by the employer shall be managed in a clear, transparent and fair manner.

1.5 By use of recruitment agency, all commissions and other fees in connection with the employment should be covered by the employer.

2 Freedom of Association and the Right to Collective Bargaining

(ILO Conventions No. 87, 98, 135 and 154)

2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.

2.2 Workers representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3 Child Labour

(UN Convention on the Rights of the Child, ILO Conventions No. 138, 182 and 79, and ILO Recommendation No. 146)

3.1 The minimum age for workers shall not be less than 15 and comply with i) the national minimum age for employment, or; ii) the age of completion of compulsory education, whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

3.2 There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.

3.3 No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.

3.4 Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

4 Discrimination

(ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1 There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic bacground, religion, caste, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

4.3 All workers with the same experience and qualifications should receive equal pay for equal work.

5 Harsh or Inhumane Treatment

5.1 Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6 Health and Safety

(ILO Convention No. 155 and ILO Recommendation No. 164)

6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work.

6.2 Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers, in a language they understand.

6.3 The facility shall be equipped with adequate First Aid supplies and must be accessible to all workers.

6.4 Access to portable water and sanitary eating facilities shall be provided.

6.5 Toilets facilities shall be hygienic, functional and segregated per local requirements and sufficient in number for the size of the workforce. Workers shall be allowed reasonable time to use lavatory facilities. Toilet facilities must be divided by gender.

6.6 Ventilation, lightning and temperature control shall be adequate as to prevent injury to health. Every working are shall have access to windows, fans, air condition and/or heath to secure good ventilation.

6.7 The facility shall have a sufficient number of clearly marked emergency exits and these shall remain unblocked and free from obstruction in case of fire or other emergency situations.

6.8 Fire extinguishers and/or sprinkler systems shall be functional and maintained. Fire extinguishers shall be visible and easily accessed to all workers.

6.9 Machines and equipment shall have functional and visible safety devices.

6.10 Proper measures shall be taken to determine whether protective gear is needed. Protective gear shall be available to workers at no personal cost. It Is the responsibility of management that is in consistent use.

6.11 Hazardous material and waste shall be stored and handled in a safe and proper manner, and collected by qualified and certified waste collecting companies.

7 Wages and benefits

(ILO Convention No. 131)

7.1 Wages and benefits paid for a standard working week shall as minimum meet national legal standards, industry benchmark standards or the wage negotiated in a collective agreement, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment. The wages should be paid directly to the worker, regularly and on time.

7.3 Deductions from wages as a disciplinary measure shall not be permitted.

7.4 Pay slips or other information regarding wages should be presented in a understandable manner to the worker. The pay slip shall also indicate the number of working days, wages/ piece rate per day, overtime hours and overtime pay, bonuses etc.

7.5 The piece rate shall be calculated so that those producing the least amount always receive minimum wage within normal working hours.

7.6 Holiday pay, sickness allowance, maternity leave compensation, as well as other compensated absences established by law shall be covered by the manufacture pursuant to the particular country`s law and regulations.

7.7 Social benefits shall at least conform to national law or the prevailing industry standard, whichever is higher.

8 Working Hours

(ILO Convention No. 1 and 14)

8.1 Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards.

8.2 Workers shall be provided with at least one day off for every 7 day period.

8.3 Overtime shall be limited and voluntary according to national legislation.

8.4 Workers shall always receive overtime pay for all hours worked over and above the normal working hours, minimum in accordance with relevant legislation.

8.5 Piece- rate work should not be exempted from the right to overtime compensation.

9 Regular Employment

(ILO Convention No. 95, 158, 175, 177 and 181)

9.1 Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), subcontractors or other labour relationships.

9.2 All workers are entitled to a contract of employment in a language they understand.

9.3 The duration and content of apprenticeship programmes shall be clearly defined.

10 Marginalized Population

10.1 Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

11 Environment

11.1 Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport. The local environment at the production site shall not be exploited or degraded.

11.2 National and international environmental legislation and regulations according shall be respected and relevant discharge permits obtained.

11.3 No product purchased by Eurosko Gruppen AS may contain chemical compounds banned according to EU`s environmental legislation. The chemical compounds used in our products shall always meet the standard in our Restricted Substance List (RSL).

Please see Eurosko Gruppen AS Restricted Substance List

12 Animal Welfare

12.1 The animals shall be treated in a correct and dignified manner to avoid unnecessary pain and suffering during breeding, transportation and handling.

12.2 No leather taken while the animal was alive, are allowed to used in production of goods for Eurosko Gruppen AS.

12.3 Leather products and fur must be manufactured from the skins of utility animals such as pig, sheep and cow, where the animals have been originally slaughtered for the meat market.

12.4 Eurosko Gruppen AS will not allow nor accept to use products from endangered species on the CITES (Convention on International Trade in Endangered Species) or IUCN (International Union for the Conservation of Nature) list.

12.5 Complete Animal welfare policy: **https://www.eurosko.com/no/barekraft/miljo/vare-policyer**

13 Corruption

13.1 Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

13.2 Complete Anti Corruption policy: **https://www.eurosko.com/no/barekraft/miljo/vare-policyer**

14 Management Systems of Suppliers

The management system is key to the implementation of the code of conduct. Eurosko Gruppen AS emphasises the importance of suppliers having systems that support such implementation. Eurosko Gruppen AS expectations in this regard are summed up in the following measures:

- The supplier should make a centrally placed employee responsible for the implementation of the code of conduct in the supplier's business.
- The supplier must make the code of conduct known in all relevant parts of its organisation.
- The supplier must obtain Eurosko Gruppen AS consent prior to outsourcing production or parts of production to a sub-supplier/contractor, if this has not been agreed in advance.
- The supplier must be able to give an account of where goods ordered by Eurosko Gruppen AS are produced.

APPENDIX 1.

Minimum Requirements - Dormitories

- Dormitories shall be single sex.
- Every worker shall have their own lockable storing facilities for safe storing of personal assets.
- Lavatory and washing facilities shall be hygienic, functional, gender segregated and sufficient in number.
- Workers shall have access to portable water. Facilities for storage and preparation of food shall be clean and hygienic.
- Ventilation, lighting and temperature control shall be adequate as to prevent injury to health.
- The facility shall have a sufficient number of clearly marked emergency exits and these shall remain unlocked and free from obstruction incase of fire or other emergency situations.
- Fire extinguishers and/or sprinkler systems shall be functional and maintained. Fire extinguishers shall be visible and easily accessed to all workers.
- Workers living on the premises must be free to leave and enter the premises.