

Internal Guidelines & Code of Conduct For employees in Universal Brands AS

We strive to have sustainable business practices that respect people, society and the environment, which is why we have developed an internal policy to complement our external policies. In order to achieve sustainable business practices, we want to work closely with our suppliers and business partners. Collaboration in the supply chain is a prerequisite for responsible business practices and for achieving the UN Sustainable Development Goals.

Requirements for own business

Our policy for sustainable business practices forms the basis for our work on sustainability, also in the supply chain. We strive to improve our own policies and practices where relevant. You can find more information about our sustainability work [here](#)

Our suppliers and partners can expect our business and procurement practices to enhance, not undermine, their ability to deliver on our demands on people, society and the environment. *Universal Brands AS* always strives for cooperation as a starting point. However, we will terminate a business relationship or other cooperation if our supplier or partner does not meet our expectations for sustainable business practices. These strong requirements are also expected internally and is upheld by management

Requirements for employees

We expect our employees and partners to work purposefully and systematically to comply with our guidelines and principles for sustainable business practices, covering basic requirements for human rights, labour rights, anti-corruption, animal welfare and the environment. Our employers shall:

- Adhere to guidelines, including principles for sustainable business practices.
- Work actively with due diligence, i.e. carry out own risk assessments for negative impacts on people, society and the environment, and stop, prevent and reduce such impacts. The measures must be monitored and assessed and communicated to those affected. Where the company is responsible for the negative impact/damage, the company is also responsible for recovery.
- Demonstrate the willingness and ability to continuously improve people, society and the environment through cooperation.
- At the request of clients document how they themselves, and any subcontractors, work to comply with the guidelines.
- Use our system for handling complaints related to human rights, labour rights, the environment and corruption.
- Avoid trading partners that have activities in countries that are subject to a trade boycott by the UN and/or Norwegian authorities.



Principles of Sustainable Business Practices (Code of Conduct)

These principles of sustainable business practices are based on UN and ILO conventions and set out minimum and not maximum standards. The legislation of the place of production shall be respected. Where national laws and regulations cover the same subject matter as these guidelines, the highest standard shall apply.

1. Forced labour/slave labour (ILO Conventions Nos. 29 and 105)

- 1.1. There shall be no form of forced labour, slave labour or involuntary labour.
- 1.2. Workers shall not be required to submit deposits or identity papers to their employer and shall be free to terminate their employment with a reasonable notice period.

2. Trade unionism and collective bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

- 2.1. Workers shall, without exception, have the right to join or establish trade unions of their choice and to bargain collectively. The employer shall not interfere with, obstruct or oppose trade unionism or collective bargaining.
- 2.2. Trade union representatives shall not be discriminated against or prevented from carrying out their trade union work.
- 2.3. Where the right to free organisation and/or collective bargaining is restricted by law, the employer shall facilitate and not hinder alternative mechanisms for free and independent organisation and negotiation.

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

- 3.1. The minimum age for workers shall not be less than 15 years and in line with the national minimum age of employment, or; minimum age for compulsory schooling, with the highest age as applicable. If the local minimum age is set at 14 years in accordance with the exemption in ILO Convention 138, this may be accepted.
- 3.2. New recruitment of child workers in breach of the above minimum age shall not take place.
- 3.3. Children under the age of 18 shall not perform work detrimental to their health, safety or morals, including night work.
- 3.4. Action plans shall be established for the early phasing out of child labour in violation of ILO Conventions 138 and 182. The action plans shall be documented and communicated to relevant staff and other stakeholders. Support schemes shall be facilitated whereby children are given the opportunity for education until the child is no longer of school age.

4. Discrimination (ILO Conventions 100 and 111 and the UN Convention on the Elimination of Discrimination Against Women)

- 4.1. There shall be no discrimination in employment, remuneration, training, promotion, dismissal or retirement based on ethnicity, caste, religion, age, disability, gender, marital status, sexual orientation, trade union work or political affiliation.
- 4.2. Protection shall be established against sexually intrusive, threatening, abusive or exploitative behaviour, and against discrimination or termination on unfair grounds, e.g. marriage, pregnancy, parenthood or HIV-infected status.

5. Brutal treatment (Universal Declaration of Human Rights/UDHR)

- 5.1. Physical abuse or punishment, or threat of physical abuse is prohibited. The same goes for sexual or other abuse and other forms of humiliation.

6. Health, safety and environment (ILO Convention No. 155 and ILO Recommendation No. 164)

- 6.1. Efforts shall be made to ensure a safe and healthy working environment for workers. Hazardous chemicals and other substances must be handled properly. Necessary measures shall be taken to prevent and minimise accidents and damage to health resulting from, or related to, conditions at work.
- 6.2. Workers shall receive regular and documented training in health and safety. Health and safety training will be repeated for new hires and redeployed workers.
- 6.3. Workers shall have access to clean sanitary facilities and clean drinking water. Where applicable, the employer shall also provide access to facilities for the safe storage of food.
- 6.4. If the employer provides lodging, it shall be clean, safe, adequately ventilated and with access to clean sanitary facilities and clean drinking water.

7. Wages (ILO Convention No. 131)

- 7.1. Wages paid to workers for a normal working week shall at least be in line with national minimum wage provisions or industry standards, whichever is higher. Wages should always be sufficient to cover basic needs, including some savings.
- 7.2. Salary conditions and payment of wages shall be agreed in writing before work commences. The agreement should be understandable to the worker.
- 7.3. Deductions from wages as a disciplinary action are not permitted.

8. Working hours (ILO Conventions Nos. 1 and 14)

- 8.1. Working hours shall comply with national laws or industry standards and shall not exceed working hours in accordance with applicable international conventions. Normal working hours per week should normally not exceed 48 hours.
- 8.2. Workers shall have at least one day off per 7 days.
- 8.3. Overtime shall be limited and voluntary. The recommended maximum overtime is 12 hours per week, i.e. total working hours of 60 hours per week. Exceptions to this may be accepted if regulated by a collective agreement or national law.
- 8.4. Workers shall always receive overtime pay for hours worked over and above normal working hours (see section 8.1 above), minimum in accordance with applicable laws.

9. Regular appointments

- 9.1. Obligations towards workers in accordance with international conventions, national laws and regulations on regular employment shall not be circumvented through the use of short-term contracts (such as contract labour, casual workers and day labour), subcontractors or other labour relations.
- 9.2. All workers are entitled to a contract of employment in a language they understand.
- 9.3. Apprenticeship programs shall be clearly defined in terms of duration and content.

10. Marginalized populations

- 10.1 The production and use of natural resources shall not contribute to the destruction of the resource and income base for indigenous peoples or other marginalised populations, for example by seizing large areas of land, irresponsible use of water or other natural resources on which these populations are dependent.

11. Environment

11.1. Negative environmental impact shall be reduced throughout the value chain. In line with the precautionary principle, measures will be implemented to continuously minimise greenhouse gas emissions and local pollution, the use of harmful chemicals and pesticides, and to ensure sustainable resource extraction and management of water, oceans, forests and land, and the preservation of biodiversity.

11.2. National and international environmental legislation and regulations shall be complied with and relevant emission permits obtained.


12. Corruption

12.1. Bribery of any kind is unacceptable, such as the use of alternative channels to secure illegitimate private or work-related advantages to customers, agents, contractors, suppliers or their employees and public officials/women.

13. Animal welfare

13.1. Animal welfare shall be respected. Measures should be taken to minimise negative impacts on the welfare of farmed and working animals.

13.2. National and international animal welfare legislation and regulations shall be complied with.

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