



Code of Conduct – Trigonor AS

At Trigonor AS we strive to work in a sustainable and responsible manner, where the UN Sustainable Development Goals provide guidelines for our work. We are dedicated to the world's joint effort to end poverty, fight inequality, and help stop climate change.

Trigonor AS shall contribute to Sustainable Development where we meet the needs of the present generation without compromising the ability of future generations to meet their own needs.

We have high expectations to ourselves and acknowledge that our business practices can have a negative impact on people, society, and environment. At the same time, this gives us an opportunity to contribute to positive development in our own supply chain. Cooperation with our suppliers on a sustainable value chain is important for Trigonor AS. However, if the supplier is unable to document, shows a lack of willingness or ability to comply with our guidelines, termination of the contract may occur.

Trigonor AS expects suppliers to carry out due diligence assessments where they risk assess their supply chain, and stop, prevent, and reduce negative impact when needed. The measures are monitored, and the effect is assessed and communicated to those affected. Where Trigonor AS has a negative impact on people, society or environment, the supplier shall stop the activity and repair damage.

An important measure in a sustainable value chain is responsible purchasing practice. Trigonor AS shall facilitate so that our suppliers can comply with our requirements and to ensure good conditions for people, society, and environment. We want long-term suppliers who work actively with positive development in their value chain.

Trigonor AS supports Freedom of Association, and our suppliers and partners must involve workers' representatives and other relevant stakeholders in their work for a sustainable value chain.

All suppliers and partners must avoid trade with partners who have activities in countries that are subject to trade boycott by the UN and/or the Norwegian authorities.

We expect our suppliers and partners to work systematically to comply with our guidelines, which cover requirements for human rights, employee's rights, anti-corruption, animal welfare and environment. Upon request from Trigonor AS, suppliers must document how they, their suppliers, and subcontractors, work to comply with our guidelines and have a system for handling complaints.



Responsible Business Conduct

Trigonor AS' principles for Responsible Business Conduct practices are based on UN- and ILO conventions and indicate minimum and not maximum standards. The legislation at the place of production must be respected. Where national laws and regulations cover the same subject as our guidelines, the highest standard shall apply.

1. Forced and compulsory labor (ILO Conventions Nos. 29 and 105)

- 1.1. There shall be no forced, bonded, or involuntary prison labor.
- 1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 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, or 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 Labor (UN Convention on the Rights of the Child, ILO Conventions Nos. 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 the national minimum age for employment, or 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 labor 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 labor that is hazardous to their health, safety, or morals, including night work.
- 3.4. Policies and procedures for remediation of child labor 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 background, caste, religion, 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 behavior, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood, or HIV status.

5. Harsh or Inhumane Treatment (UN Covenant on Civil and Political Rights, Art. 7)

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. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

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

6.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.4. Accommodation, where provided, shall be clean, safe, and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Wages (ILO Convention No. 131)

7.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, 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.

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



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. Weekly working hours should not on a regular basis be more than 48 hours.
- 8.2.** Workers shall be provided with at least one day off for every seven-day period.
- 8.3.** Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.
- 8.4.** Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

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 using short-term contracting (such as contract labor, casual labor, or day labor), sub-contractors or other labor 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 programs shall be clearly defined.

10. Marginalized Populations (UN Covenant on Civil and Political Rights, art. 1 and 2)

- 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.** Negative impact on the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.
- 11.2.** National and international environmental legislation and regulations shall be respected, and relevant discharge permits obtained.

12. Corruption

- 12.1.** 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. Animal welfare

13.1. Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.

13.2. National and international animal welfare legislation and regulations shall be respected.

14. Management System - important element to the implementation of our guidelines:

14.1. Our suppliers should make a designated employee responsible for implementing Trigonor AS' guidelines.

14.2. The responsible person distributes the guidelines and makes them known in all relevant parts of the organization.

14.3. The supplier must obtain consent from Trigonor AS before production or parts of production are outsourced to a subcontractor where this has not been agreed in advance.

14.4. The supplier must be able to account for where goods ordered by Trigonor AS are produced.