



Supplier Code of Conduct

Purpose, scope and foundations of the Code

At Steen-Hansen we believe acting ethically and responsibly is not only the right thing to do as a person, but also the right thing to do for our business. Steen-Hansen has developed this Global Supplier Code of Conduct (“Supplier Code”) to clarify our global requirement to our suppliers in the areas of business integrity, labour practices, employee health and safety and environmental management.

- Suppliers, vendors, and other providers of goods and services who do business with Steen-Hansen entities worldwide (“Suppliers”) shall follow this Supplier Code.
- The supplier is responsible for communicating the Code to their sub-contractors and ensure that suppliers in their supply chain adhere to the responsibilities set out in this Code.

This Code shall ensure that Steen-Hansen group and all its subsidiaries including but not limited to Steen-Hansen AS and Steen-Hansen Chile SpA act professionally and responsibly with our Suppliers.

The Code is based on the International Bill of Human Rights, the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact 10 principles regarding human rights, labour rights, environment, and anti-corruption.

Business Conduct Principles

Steen-Hansen expects its Suppliers to conduct business responsibly, with integrity, honesty and to adhere to our values and the following principles:

1. Suppliers shall comply with local laws and regulations of each country of operation.

If provisions in national and/or regional laws, regulations or rules in the country or countries of operation provide a more stringent position to the standards set forth in this Supplier Code, such legislation shall prevail.

2. Compete fairly for business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.

Steen-Hansen is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials or other third parties by Suppliers are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage (for yourself or third parties) through dishonest or illegal means. Corruption includes, but is not limited to bribery, extortion, facilitation payments, nepotism and cronyism, fraud, money laundering, transfer mispricing, tax evasion or tax avoidance, market distortion, conflict of interest and unfair competition.



3. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.

Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Suppliers shall not discriminate in employment, including with regard to hiring, compensation, advancement, discipline, termination and retirement, in violation of the laws and regulations, including on the basis of alienage or citizenship, age, colour, creed, disability, gender identity, genetic characteristics, marital status, domestic violence victim status, conviction record, military status, national origin, pregnancy, childbirth-and pregnancy-related medical conditions, race, religion, sex/gender, sexual orientation, or veteran status.

4. Treat employees fairly, including with respect to wages, working hours and benefits.

Suppliers shall comply with all applicable laws and regulations and will apply fair working conditions and sound employee relations practices. Working hours, wages and benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits.

5. Maintain and promote fundamental human rights.

Suppliers shall respect and promote fundamental human rights. Employment decisions will be based on free choice and may not involve forced or prison labour, physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.

6. Prohibit use of child labour and forced labour.

Suppliers shall adhere to the minimum employment age limit defined by applicable laws or regulations and comply with applicable International Labour Organization standards. In no instance shall a Supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental or emotional development or improperly interfere with their schooling needs. All forms of forced, compulsory or illegal labour is prohibited

7. Respect employees' right to freedom of association and collective bargaining,

Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations, in accordance with the laws of the countries in which they are employed. Where the right to freedom of association and/or collective bargaining is restricted under law, the Supplier shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations. Supplier will permit workers to openly communicate and share grievances with management about working conditions and management practices without fear of reprisal, intimidation or harassment.



8. Provide safe and healthy working conditions.

Suppliers shall proactively manage health and safety risks to minimize occupational injuries and illnesses. Suppliers must implement management systems and controls that identify hazards and assess, and control risk related to their specific industry. Suppliers shall maintain records of work-related accidents, injuries or sicknesses and corrective actions.

9. Privacy

The suppliers must respect the confidentiality of personal information of employees and other third parties and must be committed to complying with all applicable laws to maintain and protect data privacy.

10. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

When making business decisions, Suppliers are to consider the potential environmental impact of their activities along with opportunities for conservation of natural resources, recycling, source reduction, and pollution control to ensure cleaner air and water, and to reduce landfill wastes. In situations where there is risk or uncertainty of the environmental impacts, a precautionary approach and protective action shall be taken. Chemicals and hazardous substances shall be eliminated when possible or kept to an absolute minimum. When chemical or hazardous substances are used, suppliers shall ensure safe handling, storage and disposal of the substances.

11. Maintain accurate financial books and business records.

Suppliers shall maintain accurate financial books and business records in accordance with all applicable laws and regulations and accepted accounting practices.

12. Deliver products and services meeting applicable quality and safety standards.

Suppliers shall have adequate controls in place to ensure the integrity, quality and safety of their products and services provided by Supplier to Steen-Hansen.

13. Prohibit gifts and entertainment to Steen-Hansen employees.

Suppliers are prohibited from providing or offering gifts or entertainment to Steen-Hansen AS employees that could inappropriately influence Steen-Hansen's business decisions or gain an unfair advantage.

14. Report suspected violation of the Supplier Code (Whistleblowing)

If corruption or other violations of the Supplier Code are suspected, we encourage all parties to report the matter to us. All such reports are treated as confidential, where permitted by law, and the reporter may remain anonymous, where permitted by law. We note that anonymous report or call may be more difficult to investigate.



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Implementation and compliance of the Supplier Code

It is the responsibility of the Supplier to make sure that both the content of the Supplier Code is communicated, understood and acted upon within their organizations and to encourage employees to reveal behaviour that may be non-compliant with the Code. Suppliers shall establish appropriate management processes and maintain records to comply with this Supplier Code. With prior notice, Steen-Hansen may conduct reasonable audits to verify Supplier's compliance with this Supplier Code.

Supplier's pledge:

The supplier hereby pledges to comply with Steen-Hansen's Supplier Code of Conduct in the course of its own operations and demand the same of its sub-suppliers. The supplier further pledges to report any suspected violation of or imperfect compliance with the provisions of this Code of Conduct to Steen-Hansen.

The undersigned supplier confirms its compliance with the obligations set out above and confirms the existence of compliance monitoring procedures.