

## A Message from our Chief Executive Officer

At ABL Group, our success is built on a foundation of trust – the trust our clients place in us, and the trust we have in each other. Maintaining that trust requires an unwavering commitment to integrity in everything we do.

Our Code of Conduct is more than a document; it is our shared commitment to upholding the highest ethical standards. It is the guide that ensures our actions reflect our values and build a sustainable, reputable business for the future. It empowers us to navigate complex situations with clarity and confidence.

I believe in fostering an open and transparent culture. If you encounter a situation where the right path is unclear, or if you see something that concerns you, I encourage you to speak up. Voicing your questions to your manager or a member of the leadership team is a sign of strength and a vital part of our culture.

How we achieve our goals is just as important as what we achieve. I ask each of you to join me in personally committing to the principles in this Code. By acting with integrity, we not only protect our company, but we also build a workplace we can all be proud of.

Thank you for your dedication to ABL Group and to doing business the right way.



**Hege Marie Norheim**  
Chief Executive Officer, ABL Group ASA

## Our Values

We have a distinctive set of five Core Values which drive the way we do business and remain our guiding principles.



**Safety:** We prioritise **safety above all else** through our daily commitments to protect colleagues and everyone, with whom we interact.



**Technical Excellence:** We demand **technical excellence** in all that we do through integrity, quality and efficiency.



**Collaboration:** We foster a warm, collaborative and welcoming environment to **bring out the best in one another**.



**Innovation:** We **innovate** every day to improve the lives of others by being open-minded and **exploring the new frontiers in energy and oceans**.



**Truth: To Seek the Truth** is the foundation on which we were established and continues to be our guiding principle in providing the best and more pragmatic service to our clients.

## 1. Introduction

The ABL Supplier Code of Conduct (hereinafter referred to as 'Code') sets out minimum requirements for suppliers to operate in accordance with responsible business principles detailed in this Code and in full compliance with all applicable laws and regulations.

This Code reflects our commitment to the United Nations Global Compact (UNGC) and our respect for universally recognised normative standards such as the United Nations Universal Declaration of Human Rights, ISO standards on QHSE and the core labour conventions of the International Labour Organisation (ILO).

Our suppliers are also required to implement the principles and standards of this Code or similar internationally recognised standards to their own business partners, including suppliers, contractors and joint venture partners.

## 2. Business Ethics

We require our suppliers to conduct their business by adopting the highest standards of ethical behaviour.

### Suppliers should:

- avoid participation in or knowingly benefit from, any kind of corruption, extortion or bribery;
- adhere to applicable anti-corruption and anti-bribery laws, directives and regulations that govern operations in the countries in which they operate;
- avoid facilitation payments and work towards eliminating it;
- comply with all applicable international laws and regulations pertaining to the detection, prevention, and reporting of potential money laundering and terrorist financing activities.
- adhere to anti-trust and other competition laws;
- disclose any potential or actual conflict of interest to ABL;
- adhere to national and international foreign trade control laws pertaining to business transactions with countries, companies and persons (sanctions), and the transfer of goods and services, software or technology between countries (export controls).
- exercise quality and sustainability due diligence when designing, manufacturing, and testing products;
- adhere to data privacy laws and comply to contractual requirements on confidentiality and information security.

### 3. Labour and Human Rights

Suppliers shall conduct their activities in a manner that respects human rights as set out in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO) including ensuring:

**Suppliers should:**

- not use child labour nor employ workers below the age of 15 years, or below the age of 16 for work at sea, or the locally applicable minimum legal age, whichever is more stringent;
- not use forced, prison or compulsory labour;
- not receive any payment of recruitment fees by workers;
- not tolerate discrimination of any form, harassment or retaliation;
- comply with all applicable laws and regulations on freedom of association and collective bargaining;
- ensure a safe, secure and healthy workplace;
- establish fair disciplinary, grievance and termination procedures;
- comply with all applicable laws and regulations on working hours;
- provide wages and benefits that meet or exceed the national legal standards

### 4. Health Safety and Environment

We require our suppliers to provide a safe, secure and healthy working environment for all of their workforce; integrate environmental considerations in their operations and strive for continuous improvements to mitigate or minimise any adverse impacts on the environment.

**Suppliers should:**

- develop and implement effective health, safety and environment (HSE) management systems with worker participation in the HSE committees;
- ensure that HSE management systems support identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimise health & safety risks and environmental impact emanating from its operations;
- ensure compliance with applicable laws, regulations and customer requirements;
- ensure protection of their workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on HSE systems;
- empower workers to report unsafe practices without fear of reprisal;
- commit to proactively undertake HSE initiatives to protect people, the environment and assets from harm and damage;
- respect their neighbours and contribute to the societies in which they operate.

### 5. Protection of ABL Information

**Confidential Information**

Suppliers must keep confidential all ABL proprietary and non-public information, including non-public personal information received from, processed on behalf of, or disclosed by ABL.

Suppliers must take precautions to safeguard this information, including ensuring that Suppliers' personnel are under appropriate confidentiality obligations and adequately trained to safeguard confidential information.

**Data Privacy**

Suppliers must comply with all applicable data privacy and security laws and regulations, including laws and regulations regarding the cross border transfer of personal information.

Suppliers must maintain appropriate procedures, safeguards, and controls to secure and protect the confidentiality integrity and availability of confidential information, including personal information, received from, processed on behalf of, or disclosed by ABL or third parties on ABL's behalf.

Suppliers must promptly notify ABL of any suspected or actual compromise or risk of compromise to the confidentiality, integrity or availability of such confidential information. In addition, Suppliers must promptly notify ABL of any complaints or requests received from individuals relating to personal information received from, processed on behalf of, or disclosed by ABL, in accordance with applicable privacy laws and regulations.

Notification can be made in accordance with the notification mechanism specified in Section 6.

**Intellectual Property Rights**

Suppliers must not infringe, misappropriate or misuse intellectual property of ABL, ABL's business partners, or ABL's other Suppliers.

Suppliers must obtain the express written consent of ABL or the applicable owner before using or disclosing ABL's or another party's intellectual property to third parties.

### 6. Violation of this Code

**How to Report**

Suppliers must promptly report concerns and suspected or actual violations of this Supplier Code of Conduct.

Suppliers are urged to use ABL's whistleblowing channel to report suspected violations here <https://faceup.com/c/5sxvteby> (either anonymously or by name) or by scanning this QR code on your mobile phone:

