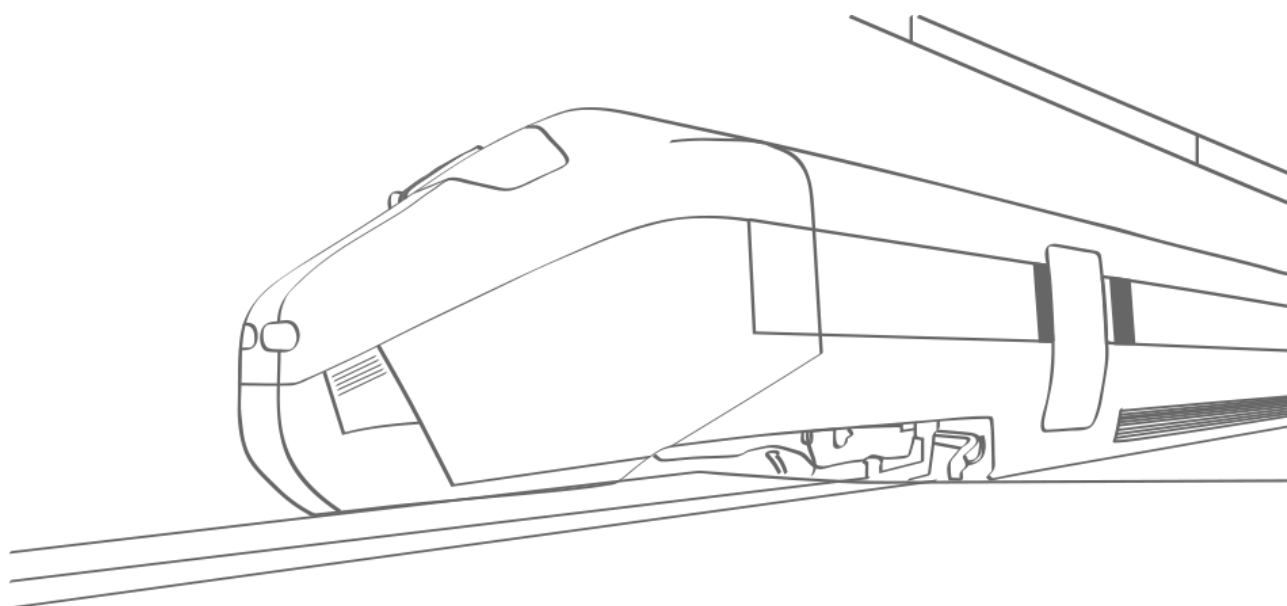
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Contents

1. Introduction.....	2
2. The supplier's ethical responsibilities.....	2
3. Internal requirements	2
4. Supply-chain requirements.....	2
4.1 Forced labour/slave labour (ILO convention nos. 29 and 105).....	2
4.2 The Right to Organise and Collective Bargaining (ILO convention nos. 87, 98, 135 and 154).....	2
4.3 Child Labour (UN's Convention on the Rights of the Child, ILO convention nos. 138, 182 and 79, ILO recommendation no. 146).....	2
4.4 Discrimination (ILO convention nos. 100 and 111, and UN's Convention on the Elimination of Discrimination against Women).....	3
4.5 Brutal treatment	3
4.6 Health, safety and the environment (ILO convention no. 155 and recommendation no. 164).....	3
4.7 Pay (ILO convention no. 131)	3
4.8 Working hours (ILO convention nos. 1 and 14).....	3
4.9 Regular employment.....	4
4.10 Marginalised population groups	4
4.11 The environment.....	4
4.12 Corruption and money laundering.....	4
4.13 Conflict of interest	4
4.14 Competition.....	4
4.15 Animal welfare	4
4.16 Supplier's management system	5
4.17 Data Protection and Privacy.....	5
4.18 Due diligence	5
5. Entitlement to information.....	5
6. Breach of the guidelines.....	6

1. Introduction

Flytoget works to promote good working conditions and environmental standards throughout our supply chain. We wish to do this in close liaison with our suppliers and partners. To make clear what we expect of our suppliers, Flytoget has drawn up guidelines for ethical trading. These guidelines include our basic requirements pertaining to human rights, workers' rights and the environment.

2. The supplier's ethical responsibilities

The goods and services delivered by Flytoget's suppliers must be produced in compliance with these guidelines. Suppliers must also share and follow up these guidelines with their own suppliers and subcontractors, thereby ensuring their commitment to compliance. Suppliers undertake to provide sufficient information about these guidelines to anyone who carries out work for Flytoget on their behalf.

3. Internal requirements

Flytoget will work continuously to improve company policies and practices that may help suppliers comply with our guidelines for ethical trading.

Suppliers must never offer or accept any unlawful or inappropriate monetary gift or remuneration to or from Flytoget, or Flytoget's staff or directors, in order to obtain commercial or private advantages for the benefit of themselves or their customers, agents or suppliers.

Flytoget's suppliers must never engage with trading partners that conduct business in countries where a trade embargo has been imposed by the UN and/or Norwegian authorities.

Suppliers must comply with current laws and regulations at all times and must meet all basic requirements in respect of human rights, worker rights and the environment.

4. Supply-chain requirements

Flytoget's guidelines for ethical trading are based on the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act) of 18 June 2021, as well as internationally recognized UN and ILO conventions and the OECD guidelines for responsible business. This framework provides minimum rather than maximum standards. Local legislation at the place of production must be respected. Wherever national laws and regulations cover the same topics as these guidelines, the highest standard shall prevail.

4.1 Forced labour/slave labour (ILO convention nos. 29 and 105)

- There must be no form of forced labour, slave labour or compulsory labour.
- Workers should never be asked to hand over deposit payments or identity papers to the employer and must be able to end their employment should they wish to do so, provided a reasonable period of notice is given.

4.2 The Right to Organise and Collective Bargaining (ILO convention nos. 87, 98, 135 and 154)

- Workers must, without exception, have a right to join or establish trade unions if they so wish, and to negotiate collectively. The employer must never interfere with, prevent or obstruct trade union organisation or collective bargaining.
- Trade union representatives must never be subjected to discrimination or prevented from carrying out their trade union work.
- If the right to free association and/or collective bargaining is restricted through statutory provisions, the employer must facilitate rather than obstruct alternative mechanisms that will ensure free and independent organisation and bargaining.

4.3 Child Labour (UN's Convention on the Rights of the Child, ILO convention nos. 138, 182 and 79, ILO recommendation no. 146)

- The minimum age of workers should never be under 15, and must at all times be in line with

- the national minimum age of employment, or;
- the minimum age for mandatory school attendance, of which the highest age shall apply. If the local minimum age of employment has been set to 14 years of age, in line with the exception to ILO convention 138, this may be found acceptable.
- Any new recruitment of child labour will be in breach of the above provisions regarding minimum age and must not occur.
- Children under the age of 18 shall never carry out work that may harm their health, safety or morals, including night-time work.
- An action plan must be drawn up for the swift phasing-out of any child labour which is contrary to ILO conventions 138 and 182. Any such action plan must be documented and communicated to relevant staff and other interested parties. Support schemes must be put in place to ensure that children are given an opportunity to access education until they are no longer of mandatory school age.

4.4 Discrimination (ILO convention nos. 100 and 111, and UN's Convention on the Elimination of Discrimination against Women)

- There must be no discrimination with respect to employment, pay, training, promotion, dismissal or retirement on grounds of ethnicity, religion, age, disability, gender, marital status, sexual orientation, trade union work or political affiliation.
- Safeguards must be put in place to protect against sexually imposing, threatening, insulting or exploitative behaviour as well as against discrimination or unfair dismissal, e.g. on grounds of marriage, pregnancy, parental status or HIV infection status.

4.5 Brutal treatment

- Physical abuse or punishment, or any threat of physical abuse, is banned. The same applies for sexual or other abuse and other forms of humiliation.

4.6 Health, safety and the environment (ILO convention no. 155 and recommendation no. 164)

- Efforts must be made to safeguard the occupational health and safety of workers. Hazardous chemicals and other substances must be handled in a safe manner. Necessary measures must be put in place to prevent and minimise accidents and ill health caused by, or related to, aspects of the workplace.
- Workers must regularly receive documented health and safety training. Health and safety training must be repeated for the benefit of new employees and redeployed workers.
- Workers must have access to clean sanitary facilities and clean drinking water. If relevant, the employer must also provide access to safe food storage facilities.
- If the employer offers overnight accommodation, this must be clean, safe, sufficiently ventilated and with access to clean sanitary facilities and clean drinking water.

4.7 Pay (ILO convention no. 131)

- The pay received by workers for a normal working week must as a minimum be in line with national minimum wage provisions or the industry standard, whichever is the highest. The wages paid must at all times be sufficient to cover basic needs, including a certain level of saving.
- The terms and conditions of pay and the payment of wages must be agreed in writing before the work commences. The agreement must be understandable to the worker.
- Withholding pay as a disciplinary measure is not permitted.

4.8 Working hours (ILO convention nos. 1 and 14)

- Working hours must be in line with national legislation or the industry standard, and must never exceed the maximum working hours laid down in current international conventions. Weekly working hours should normally never exceed 48.
- Workers must have at least one day off in seven days.
- Overtime must be restricted and voluntary. Recommended maximum overtime is 12 hours per week, i.e. a total of 60 working hours per week. Exceptions are acceptable if regulated by a collective agreement or national legislation.

- Workers must at all times receive an overtime supplement for any work carried out beyond normal working hours (see item one under section 4.8), at level with or exceeding the stipulations of current legislation.

4.9 Regular employment

- Suppliers must never dodge their employer obligations, as set out in international conventions and in national legislation and rules regarding regular employment, by relying on short-term employment (of contract workers and casual workers), sub-contractors or other forms of work relations.
- All workers are entitled to a contract of employment in a language they understand.
- Apprentice programmes must be clearly defined with regard to their duration and content.

4.10 Marginalised population groups

- Production and the utilisation of natural resources should never contribute to the decimation of resources and sources of revenue on which marginalised population groups depend, for example by confiscating large areas of land or making unwarranted use of water or other natural resources.

4.11 The environment

- Measures must be taken to reduce any adverse health and environmental impact throughout the value chain by minimising emissions, promoting effective and sustainable use of resources such as energy and water, and by minimising emissions of greenhouse gasses from production and transport. The local environment in the place of production must not be exploited or harmed by pollution.
- If their activities involve a risk to the environment, suppliers shall set up an effective system to identify any adverse impact and restrict such impact to the extent possible.
- Suppliers should implement a documented environmental control system which is appropriate for the scope, type and risk of their business, and that ensures continual improvement in terms of controlling these risks. The system should be based on internationally recognised principles of environmental control and current legislation.
- Suppliers must comply with national and international environmental legislation and regulations and must obtain all relevant emission permits.

4.12 Corruption and money laundering

- All forms of bribery are unacceptable, such as the use of alternative channels to secure unlawful private or work-related benefits for customers, agents, contractors, suppliers and their employees, or civil servants.
- Suppliers must take a firm stance against any form of money laundering and must take all necessary steps to prevent others from using the financial transactions of their business to launder money.

4.13 Conflict of interest

- Suppliers have a duty to notify Flytoget without undue delay about any existing or potential conflict between Flytoget's interest and any personal interest, or between Flytoget's interest and the interest of a third party affiliated with the Supplier. This includes instances where the supplier may have a special financial or personal interest, or otherwise if a conflict of interest may affect the supplier's objectivity and integrity so as to adversely affect Flytoget's interest.

4.14 Competition

- Suppliers shall never be in breach of general or specific competition rules, for example through unlawful price-fixing and market sharing, or take any other action in contravention of the competition legislation that applies in locations where they conduct their business activities.

4.15 Animal welfare

- The breeding, living conditions, transport and slaughter of animals must comply with the requirements set out in Norwegian law specific to the species, any EU regulations and, if the species is not mentioned in Norwegian legislation, the OIE¹ guidelines. Alternatives to animal products must be considered, and must be chosen over ethically unacceptable forms of operation.

¹ OIE: World organisation for animal health

4.16 Supplier's management system

A management system is key to the implementation of these ethical guidelines. Flytoget stresses the importance of ensuring that supplier organisations have systems that support the implementation of these guidelines. Flytoget will expect suppliers to:

- Appoint a key person within their organisation to oversee the implementation of these ethical guidelines.
- Ensure that all relevant parts of their organisation are familiar with these guidelines.
- Confirm that their subcontractors are given the necessary introduction to Flytoget's Code of Ethics to ensure that all parties involved with carrying out work for Flytoget have adequate knowledge of the code and that they understand the requirements.
- Obtain Flytoget's consent before any production, or part thereof, is contracted out to a subcontractor/supplier, unless agreed in advance.
- Be able to account for the place of production for all goods ordered by Flytoget.

4.17 Data Protection and Privacy

- The supplier shall safeguard the privacy of employees and other data subjects and process their personal data in accordance with the legislation in force at any given time. Processing of personal data on behalf of Flytoget is conditional on the parties having entered into a data processor agreement and that personal data will not be transferred outside the EU / EEA, unless otherwise expressly agreed.

4.18 Due diligence

- Suppliers must ensure strict compliance with Flytoget's ethical guidelines and other relevant legislation. This includes a duty to conduct regular risk assessments for the purpose of identifying risks and potential non-compliance, and to implement suitable measures to prevent non-compliance and/or to mitigate any risk of adverse impacts. The supplier's due diligence procedures should accord with OECD's Guidelines for Multinational Enterprises.² This duty of compliance and assessment applies similarly to the supplier's partners, subcontractors and supply-chain. Third-party software and services may be used as a primary reporting tool in this connection.

5. Entitlement to information

Flytoget can at any time request proof that suppliers and/or their subcontractors comply with these guidelines. Such proof may take the form of documentation, follow-up interviews or inspections of the supplier's/subcontractor's production and warehouse premises. Flytoget reserves the right to conduct both scheduled and random inspections. Flytoget will accept supplier's SA8000 certification or certification to a similar standard as proof of compliance with the guidelines. Should the supplier wish to produce an external compliance report, Flytoget must be furnished with information about the method of inspection and the identity of the auditors.

Flytoget is entitled to receive information about the supplier's and/or their subcontractor's handling of actual and potential adverse impacts on human rights and workers' rights. This includes general information and specific information associated with a specific product or service offered by the supplier, as well as an account of the effect on the supplier's entire value chain or parts thereof.

Should Flytoget find that the documentation and information received is incomplete or inadequate, the supplier may be requested to commission, on their own account, an independent third party to conduct an audit of the supplier's and /or their subcontractor's compliance with the requirements set out in these guidelines. Any such audit must be conducted by a reputable auditing company within two months of Flytoget's request. The auditing company's report must be submitted to Flytoget within one week of its completion. The supplier must keep Flytoget continually informed about the status of the audit.

The supplier must respond to Flytoget's enquiries within reasonable time and no later than within three weeks. Flytoget can agree a shorter or longer deadline with the supplier.

The supplier is aware that Flytoget may engage an independent third party to assess the supplier's compliance with these ethical guidelines or employ a third-party reporting tool for non-financial matters. The supplier is also aware that Flytoget may share with public authorities any information about the supplier's

² <https://www.responsiblebusiness.no/oecd-retningslinjer/>

work on human rights and decent working conditions in line with the requirements set out in ss. 6 and 7 of the Transparency Act.

6. Breach of the guidelines

Flytoget must receive immediate notification if the supplier uncovers or suspects a breach of these guidelines, or relevant legislation, within his own organisation or that of a subcontractor, or if the supplier otherwise uncovers a serious risk of adversely impacting basic human rights or workers' rights.

The supplier must inform Flytoget of any suitable measures that have been implemented or planned in order to address a breach of the guidelines or a risk of adverse impact. The supplier has a duty to rectify any identified breach, including any violation caused by subcontractors. Any such breach must be rectified by the deadline set by Flytoget. The deadline must be proportionate with the nature of the breach. Flytoget must be kept continually informed about changes made.

Failure to comply with these guidelines is considered a material breach of contract and gives Flytoget the right to terminate the agreement with the supplier. The supplier has no right to avert termination by addressing the breach, and his duty to rectify the matter remains irrespective of Flytoget's termination.