

# Supplier Code of Conduct

## 1. Purpose and Scope

Akershus Eiendom expects all suppliers and business partners (hereinafter referred to as **Suppliers**) to comply with applicable laws, regulations, and guidelines related to human rights and decent working conditions, including the Transparency Act, the OECD Guidelines for Due Diligence, the Norwegian Agency for Public and Financial Management (DFØ)'s high-risk product list, and the Norwegian Labour Inspection Authority's list of sectors subject to information and monitoring obligations. For country risk, reference is made to the Global Rights Index, Labour Rights Index, and Transparency International's Corruption Perceptions Index.

Suppliers are expected to conduct adequate risk assessments of their supply chains to ensure that high risks of human rights violations or unacceptable working conditions are not overlooked. Any violations must be reported immediately to Akershus Eiendom via the whistleblowing channel on our website.

## 2. Decent Working Conditions

Our suppliers shall ensure that workers in the supply chain are treated fairly and with respect. Child labor or any form of forced labor must never be tolerated. In cases where such conditions are suspected among subcontractors, Akershus Eiendom must be notified immediately via the whistleblowing channel on the company's website.

### 3. Wages and Working Conditions

The Norwegian Labour Inspection Authority's regulation on information and monitoring obligations for clients applies to all sectors with generally applicable collective agreements. This includes electrical trades, passenger transport, cleaning, accommodation, hospitality, and catering industries.

The general application of collective agreements means that specific parts of a nationwide agreement—such as provisions on wages, working hours, and travel, food, and lodging expenses—are made mandatory for all workers operating within the scope of the agreement. The regulation applies to both Norwegian and foreign workers.

The regulation allows clients to demand documentation from suppliers and subcontractors in these sectors proving compliance with wage and working condition requirements. Akershus Eiendom expects to receive such documentation upon request and may require adherence to these conditions in supplier contracts.



## 4. Health, Safety, and Environment (HSE)

Suppliers to Akershus Eiendom must comply with national laws and regulations related to HSE. This includes the Working Environment Act, the Environmental Protection Act, and other relevant legislation aimed at protecting workers' health and safety. Suppliers must perform thorough risk assessments to identify potential hazards and implement necessary measures to minimize the risk of work-related accidents, illnesses, and injuries.

#### 5. GDPR Violations

Akershus Eiendom is committed to ensuring that privacy and the processing of personal data are handled in a responsible and lawful manner. Suppliers must comply with applicable privacy laws and regulations, including the GDPR.

Suppliers shall only process personal data for agreed purposes and in accordance with the information provided by the data subject.

Suppliers must collect and store personal data securely, ensuring confidentiality, integrity, and availability. Appropriate security measures should be implemented to protect against unauthorized access, loss, or destruction.

Suppliers shall limit the sharing of personal data with third parties, unless necessary to fulfill agreed purposes and only after carefully evaluating the privacy implications. If subcontractors are involved, they must be subject to equivalent data protection requirements and security measures.

Suppliers shall assist in fulfilling the rights and obligations under the GDPR, including rights of access, rectification, erasure, and restriction of processing. They must also be prepared to respond to privacy-related inquiries and complaints.

#### 6. Discrimination and harassment

Akershus Eiendom has zero tolerance for discrimination and harassment. This is essential to ensure a safe and inclusive environment in the workplace, educational institutions, or society in general. Everyone must be treated with respect and dignity, regardless of gender, race, ethnicity, religion, sexual orientation, disability, or other protected characteristics.



#### 7. Environment

Akershus Eiendom AS is certified as an Eco-Lighthouse (Miljøfyrtårn). The company seeks to ensure that as many of its suppliers and business partners as possible are environmentally certified within their respective industries.

Suppliers and business partners are expected to continually work to minimize their environmental footprint to promote sustainability.

Responsible resource use: Suppliers shall manage and use natural resources responsibly, focusing on reduction, reuse, and recycling. Renewable resources and energy sources should be encouraged.

Energy efficiency: Efforts should be made to reduce energy consumption and promote energy-efficient solutions, including efficient lighting, appliances, and equipment, as well as implementing energy-saving measures in production processes.

Waste management: Suppliers shall have effective systems in place to minimize waste, including recycling and proper handling of hazardous waste.

Reducing emissions: Suppliers must work to reduce greenhouse gas emissions and other pollutants by implementing energy-efficient technologies, using alternative transportation methods, and investing in green energy.

Nature and biodiversity conservation: Suppliers shall work to preserve ecosystems, habitats, and biodiversity by maintaining green areas, using sustainable agriculture methods, and supporting the protection of endangered species.

Responsible supply chain: Suppliers shall collaborate with their supply chains on sustainability and adopt similar ethical and environmental standards. They should also promote ethical trade and reduce the use of environmentally harmful materials.

Continuous improvement: Suppliers shall continuously monitor and evaluate their environmental impact and set goals for improvement. This may involve implementing environmental management systems and engaging in R&D for sustainable solutions.

### 8. Whistleblowing

If suppliers suspect direct harmful environmental impacts in their supply chain, they must notify Akershus Eiendom immediately via the whistleblowing channel on the company's website.