



Responsible Business Partner Policy

1. Policy statement

Glamox is committed to responsible business practices and conducting business with the highest ethical standards. Glamox respects the laws, cultures, and dignity and rights of individuals in all countries where we operate.

1.1 Purpose and scope

This policy is part of our framework to make sure that Glamox' suppliers act lawfully, respectfully and responsibly. The purpose of this policy is to outline Glamox' expectations that also our Business partners adhere to our policy.

In this document, the capitalized terms listed below have the following meaning:

- Business partner means a supplier with whom Glamox conducts business, including its subsidiaries, subcontractors and suppliers (and any tier suppliers who has impact to Glamox operations)
- Glamox means Glamox AS and all subsidiaries in which Glamox AS, directly or indirectly, holds at least 50% of the shares

2. Compliance with laws and conventions

This policy defines the minimum standards that Glamox expects Business partners to respect when conducting business with Glamox. It covers human rights, labor rights, ethical business conduct, and environment.

Glamox expects all Business partners to adhere to the principles set out in this policy and to comply with all applicable local, national and international law, including all applicable conventions. In the event this policy and applicable law address the same topic; the strictest rule shall prevail.

3. Human rights

Glamox requires its Business partners to uphold all internationally recognized human rights wherever their operations are located.

3.1 Fair and Equal Treatment

Business partners shall treat their employees with respect and dignity and protect workers' right to integrity and privacy.

Business partners shall not discriminate on grounds such as ethnicity, gender, sexual orientation, marital, social or parental status, religion, political grounds, nationality, disability, medical status, age or union affiliation. Any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment must not be tolerated.

3.2 Rights of minorities

Business partners shall ensure that their activities do not contribute to the destruction of the resources and income bases for marginalized population groups.

4. Labour rights

4.1 Child labour and Young workers

The use of child labour is strictly prohibited. In the case that a Business partner employs young workers below the age of 18, the Business partner must demonstrate that the young worker does not carry out hazardous work, heavy work or work night shifts.

4.2 Forced labour

All work must be voluntary. Business partners' employees shall be free to leave work or terminate their employment upon reasonable notice according to established rules.

4.3 Freedom of association and right to collective bargaining

Business partners' employees shall be free to form, join or not to join a trade union or employee organization of their choice. The employees shall also have the right to bargain collectively without fear of reprisals.

4.4 Employment terms

Business partners' employees are entitled to written employment contracts, in a language they understand, specifying their terms of employment and termination. Employer responsibilities shall not be avoided by the Business partners through contracting or subcontracting workers or by other arrangements.

4.5 Equal treatment

The Business partners shall recruit, select and promote their employees and suppliers solely based on qualifications and skills. Glamox will not accept any form of discrimination, including hiring, compensation, advancement, disciplinary actions, termination or retirement based on

grounds such as ethnicity, gender, sexual orientation, marital, social or parental status, religion, political grounds, nationality, disability, medical status, age or union affiliation.

4.6 Working hours

Business partners shall respect and comply with all applicable laws, international conventions and, if applicable, collective bargaining agreements regarding working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

4.7 Wages

Business partners shall ensure that all employees are paid a fair wage, i.e. at least the minimum wage according to national legislation. Business partner shall compensate overtime and provide all employees with adequate insurance and benefits. The employees have the right to equal pay for equal work.

4.8 Health and safety

Business partners shall provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Business partners shall protect their employees, physical assets, information and reputation from potential security threats including cyber security threats.

Risk assessments shall be conducted regularly to identify occupational hazards followed by implementation of measures to prevent identified hazards. All facilities must be constructed and maintained in a safe manner and be equipped with adequate lighting, temperature and ventilation.

4.9 Whistleblowing routine

Business partners shall establish routines for personnel to raise concerns or request information related to their business operations.

4.10 Due diligence

Business partners shall carry out regularly risk-based due diligence throughout its operations and supply chain to identify and assess actual or potential adverse impacts on human rights and decent working conditions that the Business partner may cause, contribute towards or are directly linked with the Business partner's operations.

5. Ethical business conduct

5.1 Act with integrity in all business dealings

Business partners shall act with integrity at all times. Business partners shall not engage in personal activities or public comments that are intended to damage Glamox' business interests

or reputation. Business partners must record all business transactions accurately, prudently and transparently, in compliance with applicable accounting standards and recognized best practice.

5.2 Anti-bribery and anti-corruption

Business partners must comply with all applicable anti-bribery laws, including the Norwegian Penalty Code, the U.S. Foreign Corrupt practices Act, the UK Bribery Act 2010 and all applicable local laws where the Business partner and/or Glamox operate.

Business partners shall not offer, promise, give, demand or accept bribes or other improper benefits or advantages, including gifts and entertainment, also including facilitation payments, in order to obtain, retain or give business.

5.3 Hospitality

Business entertaining and hospitality involving individuals representing Glamox must be kept reasonable and proportionate and be done solely for the purpose of maintaining good business relations and not to influence unfairly any future business decisions. Entertaining or hospitality including services of sexual or immoral nature are prohibited.

5.4 Conflicts of interest

Business partners must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of Glamox. Business partners must declare all and any conflict of interest in any business dealing to Glamox, to allow Glamox to take appropriate action.

5.5 Fair competition

Glamox believes in competing fairly in the market place. Business partners must comply with all applicable competition laws, which prohibit agreements, business practices or conduct that are anti-competitive or unreasonably restrain trade. Business partners shall not pay or accept kickbacks or facilitation payments and must prevent direct or indirect financial crime such as money laundry, fraud or embezzlement, by having a process in place for identifying and handling such incidents.

5.6 Confidentiality and data privacy

Business partners shall protect all confidential information provided by Glamox. Confidential information must be stored so that it cannot be accessed by unauthorized personnel and/or third parties and it should only be used for its intended purpose. Business partners shall take appropriate technical and organizational measures to protect information that includes personal data and Business partners shall comply with applicable privacy laws and regulations.

5.7 Conflict Minerals

Business partners shall ensure not to supply products that contain conflict minerals which directly or indirectly finance or benefit armed groups and cause human rights abuses.

6. Environment

6.1 Minimal impact

Business partners shall operate in a manner that protects the environment and must comply with all applicable environmental laws, regulations and standards. Operations, sourcing, manufacture, distribution of products and the supply of services should be conducted with the aim of protect and leave minimal impact to the environment. Business partner shall promote the use and development of environmentally friendly technology.

6.2 Chemicals and hazardous substances

Chemicals and hazardous substances shall be eliminated if possible or kept to an absolute minimum. When using chemical or hazardous substances, the Business partners shall ensure safe handling, storage and disposal of the substances. All substances should be properly marked.

6.3 Energy and greenhouse gas emissions

Business partners shall prioritize the use of renewable energy sources if possible. Business partners shall strive to minimize greenhouse gas emissions.

6.4 Waste and water

Business partners shall strive to reduce waste and reuse and recycle resources. Water shall be used responsibly, and the Business partners shall strive towards reducing the consumption. Business partners shall ensure that water from the operations is treated and reused when possible.

6.5 Responsible Sourcing of Raw Materials

Where relevant, Business partners shall ensure responsible sourcing of raw materials. This includes giving preference to recycled materials, certified sustainable materials, and suppliers that can demonstrate traceability and responsible management of their own supply chains.

7. Quality of products and service

Glamox expects each Business partner to deliver products and services to meet the specifications, quality and safety criteria defined in business documentation.

8. Sanctions and Export Control

Business partners must comply with all applicable sanctions and export control regulations in all applicable jurisdictions. This includes, but is not limited to, ensuring that products, services, technology, and financial transactions are not supplied, exported, or otherwise made available in violation of international sanctions, trade restrictions, or export control regulations. Business partners shall have measures in place to identify and mitigate risks related to sanctions and export control compliance, and must promptly report any concerns or breaches to Glamox.

9. Communication and monitoring

9.1 Communication

Business partners will make the content of this policy known to employees dealing with Glamox, and promote and monitor compliance.

9.2 Documentation

Each Business partner must upon Glamox' request provide Glamox with all documentation and information necessary to demonstrate its compliance with this policy.

9.3 Monitoring

Glamox reserves the right to request that the Business partners participate in a self-assessment questionnaire. Glamox also reserves the right to collect sustainability data from the Business partners, as well as the right to conduct audits and perform site visits. In case any deviations towards the policy are identified, the Business partner will be asked to provide a corrective action plan for Glamox to approve. Glamox reserves the right to terminate its contract with a Business partner in the case of material breaches against the responsibilities outlined in this policy or any of the underlying conventions and declarations.

9.4 Notification

Business partners shall immediately notify Glamox about any risk/potential risk which may impact our operations.

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