

# The DOF Group Supplier Code of Conduct

Effective from: 14<sup>th</sup> of October 2024

## INTRODUCTION

### Applicability

This Supplier Code of Conduct applies to all suppliers conducting business with the DOF Group and is based on DOF's Code of Business Conduct, setting out principles of behaviour and ethical standards. All suppliers are also required to adhere to DOF's general terms and conditions.

A "Supplier" is defined as a supplier, subcontractor, agent, consultant or any other third-party being engaged by DOF for the supply of goods/hired-in equipment or the provision of services.

This Supplier Code of Conduct is not intended to be an exhaustive list of all ethical and business conduct requirements but is a supporting guideline for suppliers to make sustainable operational decisions aligned with DOF values and policies, as well as to help suppliers understand their responsibilities and functions in complying with laws, regulations, and policies, everywhere we do business. We encourage all suppliers to adequately train their employees and subcontractors in the principles and guidance that we show here, both to raise awareness and ensure best practices throughout business operations and wider supply chains.

## PRINCIPLES

### Overview

**UN Global Compact:** DOF is committed to upholding the UN Global Compact principles for Human Rights, Labour, Environment and Anti-corruption within our organisation and throughout. This is the backbone to this code sets forth the expectations we have towards our suppliers.

This Supplier Code of Conduct delineates the standards we require our suppliers to meet. We expect our suppliers to possess knowledge of, comprehend, and establish procedures for compliance with the laws applicable in their operational jurisdictions.

**Compliance with Standards:** Suppliers are expected to create and enforce policies that align with the expectations outlined in this Supplier Code of Conduct. Furthermore, suppliers are required to ensure that comparable standards are maintained downstream in their own supply chains. Violations of this Supplier Code of Conduct are taken

seriously and should be reported immediately upon discovery by the supplier. Non-compliance with this Supplier Code of Conduct may result in the implementation of corrective action plans, which will require suppliers to demonstrate that they have provided appropriate remediation and integrated effective systems and processes to prevent future non-compliances. Where all efforts have been exhausted and suppliers are unable to achieve compliance, DOF may responsibly terminate the business relationship.

### Human Rights

**Respect for Human Rights:** DOF Group actively supports and promotes fundamental human rights and is committed to ensuring that our operations do not violate international standards and conventions. We hold our suppliers to the same standards, expecting them to avoid causing or contributing to adverse human rights impacts through their operations. We expect our suppliers to notify us of any identification of potential human rights violations in their own operations and supply chains. This will enable DOF to assess whether our business has caused, contributed, or is linked to any potential adverse human rights impacts. Furthermore, we will be able to establish whether DOF is required to provide remediation and will also help us to identify any potential weaknesses in our own processes, as we strive to continuously improve.

**Adherence to Applicable Laws:** Suppliers must take all necessary actions to prevent adverse human rights impacts directly linked to their business relationships, and they must comply with all applicable laws while respecting internationally recognized human rights. Consistent procedures should be maintained, even when business practices vary across different countries. Suppliers must ensure that all parties in their supply chain share and implement the same human rights standards and conduct due diligence within their supply chains.

**Dignity and Respect:** DOF expects suppliers to treat workers with dignity and respect and to foster a workplace culture that does not tolerate harassment.

### Labour

**Labour Standards:** Suppliers must not engage in forced labour or child labour. Compliance with applicable standards regarding wages and working hours is expected. Providing a safe, healthy work environment, and taking necessary precautions to prevent accidents and injuries, is a vital aspect of labour standards, as well as ensuring that there is no harsh or inhumane treatment exercised against workers. Suppliers should also make efforts to ensure that regular and recognised employment is provided, that no discrimination takes place anywhere in their business or supply chain and must respect the legal rights of workers' freedom of association.

## Environment

**Environmental Responsibility:** We all share a responsibility to protect our environment and minimise our environmental impact in all our operations. We expect our suppliers to take practical measures to reduce their environmental impact and operate safely and sustainably.

**Regulatory Compliance:** Suppliers are expected to implement controls and actions to meet both statutory and non-statutory environmental requirements. They must consider environmental impacts and interactions in decision-making and risk management processes and ensure due diligence is followed to verify that business partners comply with the same standards of environmental management.

## Integrity, ethics and anti-corruption

**Business Conduct:** Fair business conduct is a fundamental principle for the DOF Group. We promote and maintain the highest level of integrity, ethical behaviour, and accountability, and we expect the same from our suppliers. Suppliers are required to comply with all laws and regulations within their business jurisdiction and respect the confidentiality of customer and supplier information. Our internal guidelines for safe, legal and ethical decision making can be found in our Code of Business Conduct<sup>2</sup>.

Suppliers are expected to maintain the highest standards of ethical behaviour and not engage in any form of corruption, including bribery, extortion, or other unethical practices.

## Data security and privacy

**Data Protection:** The DOF Group complies with all applicable privacy and data protection laws, including the GDPR and LGPD, wherever we operate. We protect personal information provided to DOF and expect our suppliers to do the same.

## Diversity, equality and inclusion

**Supporting Diversity and Equality:** DOF values and promotes diversity and inclusion in every aspect of our business. Suppliers are expected to treat people with dignity and respect at work, uphold wage and benefit laws, support the right to Freedom of Association & Collective Bargaining in line with the UN Global Compact, and have a Grievance System in place. Our internal guide to understanding and preventing harassment in our workplace can be found in our Dignity and Respect at Work Guide<sup>3</sup>.

## MONITORING AND AUDITING

**Compliance Assessment:** DOF may conduct annual compliance surveys or on-site audits to verify compliance with this Supplier Code of Conduct. These surveys and audits may be conducted directly by DOF, or by appointed third parties. In cases of non-compliance, corrective actions will be discussed through open dialogue. Suppliers are expected to

continuously and systematically evaluate their compliance with this Supplier Code of Conduct, implement necessary improvements, establish clear reporting mechanisms for violations or concerns, and communicate their commitment to these principles with their employees.

The supplier shall allow DOF, or a third party appointed by DOF, unrestricted access to its production sites and premises, as well as access to any pertinent documentation or any other relevant material. Suppliers must also allow communication or interviews with its employees and other personnel, which may include agents, contractors and/or subcontractors throughout its supply chain. This will enable DOF to assess the supplier's compliance with this Supplier Code of Conduct. Our suppliers are required to conduct strict due diligence on their own supply chain and must ensure that they hold their own suppliers and subcontractors to the same standards as outlined in this supplier code of conduct.

Further information relating to audit rights can be found in our General Terms and Conditions for Purchase.

## REPORTING VIOLATIONS

### Ethics Helpline

DOF Group fosters a culture of corporate compliance, ethical behaviour, and good corporate governance. We maintain an open working environment where employees and contractors can report any breaches of law, violations of DOF Group policies, or other legal or ethical concerns without fear of intimidation or reprisal. HSEQ / Ethics helpline (dof.com/helpline)



REPORT HERE

We take all concerns or issues seriously and consider each on a case-by-case basis. We commit to investigating thoroughly and, where necessary, providing an appropriate remedy.

Bergen, 14<sup>th</sup> of October 2024

Mons S. Aase  
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