

# "Code of Conduct"- our ethical guidelines

### CEO's statement

OneCo is a company that provides socially critical services. Our customers and other stakeholders expect us to operate in a sustainable manner and to prove to be worthy of their trust. We manage a great deal of responsibility whether in the form of building infrastructure for large professional companies, or being invited into the homes of our customers.

Our ethical guidelines summarise and clarify the rules that apply to everything we do in our workplaces, with our customers and when representing OneCo in any context. The ethical guidelines apply not only to all employees in OneCo, but also to all employees, subcontractors and others we work with.

We should be proud of our values, our ethical standards and the way we run our business. We set high standards for ourselves. If we adhere to our ethical guidelines, we will build the trust we depend on in order to succeed.

### Our mission and our values

OneCo's mission is to deliver concepts, services and expertise within electrical, automation and telecommunications. Together with the rest of our industry, we play a key role in the green shift and digitalisation of society. While our deliveries contribute to a sustainable future, we are also expected to operate in a sustainable manner, which in turn means that our business must maintain a high ethical standard.

Our values Long-term perspective, Generosity and Passion reflect important aspects of OneCo's culture which are also reinforced when we act in accordance with our ethical guidelines.

**Long-term perspective** means that we never compromise our ethical standard in order to achieve short-term gains.

By complying with our ethical guidelines, we ensure that everyone who works for and with us is protected from undesirable behaviour and exploitation and receives fair pay for the work they do. **Generosity** means that we prioritise this over short-term gain.

We are **passionate** about creating safe, good workplaces, delivering what we promise to customers and owners and being good neighbours in the local communities in which we operate. Strict adherence to our ethical guidelines is the best guarantee that we will achieve our goals.

# Purpose

These ethical guidelines have been established to clarify the requirements that apply to our business. By describing these requirements, we make it easier to understand how we should behave in given situations and when we are faced with ethical dilemmas.

It will never be possible to fully describe guidelines for all situations that may arise. It is therefore important that if in doubt about what the right decision or procedure may be, consult with your immediate manager or colleagues.



### **Validity**

The ethical guidelines apply to all permanent and temporary employees in OneCo as well as to contractors and subcontractors who are under our management, contracted consultants, as well as to board members and other elected representatives.

Specifically, this means in practice that everyone who works in, or for OneCo, must be familiar with and comply with our ethical guidelines.

We expect all our business associates to maintain the same standard as us and therefore seek to avoid interacting with others who do not support our values and are willing to adhere to the same ethical guidelines as us.

If there is no consensus between our ethical guidelines and other internal governing documents, guidelines and requirements, then our ethical guidelines will always take precedence, unless other requirements reflect a higher standard than what is stated in the ethical guidelines.

Laws and regulations represent minimum requirements for OneCo.

# Integrity, respect and personal responsibility

Compliance with these guidelines is a personal responsibility. Violation of the guidelines could have consequences for OneCo's reputation, its integrity and the very legitimacy of the business, in addition to major financial consequences.

OneCo will never accept unethical behaviour. Violations of ethical guidelines, laws and regulations and other relevant requirements may, depending on the severity, result in dismissal, reporting and other possible consequences.

# Sustainability and our ethical guidelines

By complying with the ethical guidelines, we contribute to OneCo conducting its business in a sustainable manner. By actively using the guidelines as a precept for the way we run our business, we will show care for the people affected, avoid negative effects on the environment and society and manage the company's resources in an efficient manner in line with long-term societal interests.

# System description

OneCo's system for ensuring compliance with our ethical guidelines consists of the following elements.

- Description of the ethical guidelines, their validity and how they are to be understood our "Code of Conduct" document.
- Our values
- Systematic training and raising awareness among our employees
- Management systems, policies, guidelines and other governing documentation with requirements for conduct and behaviour.
- Internal control systems with the purpose of prevention, detecting deviations, as well as handling and amending deviations.



## Transparency culture and notification

The basis for learning is a culture where challenges and problems can be addressed in an open and honest way, without fear of reprisals or other inconveniences. We must therefore ensure that we maintain such a culture in the company.

Everyone who works for or on behalf of OneCo has both the duty and the right to notify about irregularities should they become aware of this. Irregularities mean breaches of legal regulations, written ethical guidelines or ethical norms.

OneCo emphasises openness and facilitates safe notification in all parts of the organisation. OneCo will not tolerate any form of retaliation

Notification to the immediate manager, the manager's manager, shop steward, safety representative, CEO, or other elected representative internally. It is also possible to notify confidentially to the group's notification committee using <a href="mailto:varsling@oneco.no">varsling@oneco.no</a>

The notification rules do not apply to matters that are only related to the employees' own employment relationship, such as staff disputes or disagreements related to the employment contract.

# Caring for each other

### Health and personal safety

Our vision is that no one will be harmed or have their health impaired as a result of our business. All activities involve risk, but we believe that through systematic work, all unwanted incidents can be prevented. This means that we place high demands on how we run our business, follow best practices and ensure that everyone has the necessary competence and the right tools to perform their work tasks.

A key prerequisite for success is that each individual employee shows care for others and takes personal responsibility for their own safety and that of others. Injuries and permanently impaired health not only have major personal consequences, but also greatly affect other people such as family, friends and colleagues. Therefore, we intervene if we observe dangerous conditions, unacceptable behaviour and breaches of safety regulations.

Our requirements must, as a minimum, also be complied with by our co-suppliers and partners. Our attitude is that if we do not believe that we can carry out an assignment or a project in accordance with our HSE requirements, then we don't do it.

### Bullying, harassment and threats

OneCo disassociates itself from any form of discrimination whether on grounds of gender, age, race, religion or other circumstances. OneCo works actively for an inclusive and health-promoting working life where none of our employees - or others who carry out work for OneCo, shall experience harassment, bullying or negative attention.

We never accept any form of harassment or other conduct that may be considered offensive, threatening or degrading, including any form of unwanted sexual attention.



### Diversity and Gender Equality

It is the aim of OneCo to reflect the diversity in society. OneCo wants an inclusive work environment that is characterised by diversity and equality. To achieve this goal, we must treat colleagues, customers, business partners and others with respect and be sensitive to and respect cultural differences. OneCo is a group with a multi-ethnic workforce, and a number of nationalities are represented among our employees. We are proud of this community.

OneCo operates in male-dominated sectors and has a skewed gender balance among our employees. We believe that an increased proportion of women will contribute positively to the working environment, the quality of our deliveries, and the results we achieve. A better gender balance will contribute to a strengthened reputation and increased attractiveness as an employer for both sexes.

We will never accept discrimination or differential treatment based on age, gender identity or gender expression, disability, sexual orientation, ethnicity, political or religious beliefs or other characteristics.

### Human rights, child and forced labour

OneCo is a member of the UN Global Compact, which is a global network for companies that want to work with social responsibility and contribute to sound and sustainable corporate practice. Today, the UN Global Compact is the world's largest initiative for corporate social responsibility. OneCo recognises and complies with the core conventions on human rights and the prohibition of child labour and forced labour.

### Wages and working conditions and freedom of association

Freedom of association is a matter of course in OneCo and all OneCo's business areas have collective agreements that regulate the working relationship with the individual and cooperation between the parties. The dialogue and cooperation between the parties shall be characterised by openness and a willingness to find agreed solutions.

### Drugs and alcohol

OneCo shall be a drug-free workplace and no one shall be under the influence of alcohol or other intoxicants while carrying out work for OneCo. In social contexts, and during events where it is appropriate and acceptable, alcohol may be served in moderation.

### Purchase of sexual services

The purchase of sexual services supports human trafficking, is a violation of human rights and poses a security risk. OneCo prohibits the purchase of sexual services in connection with work or business travel for OneCo. We must never accept sexual services paid for by others.

### Protect employee information

We respect the privacy of all people and ensure that personal information is treated with honesty, integrity and in accordance with applicable laws and guidelines.

# Care for society and the environment

### Good neighbourliness

Good neighbourliness means that through our business we create good local jobs while seeking to minimise possible negative consequences of our business on our neighbours. We achieve this



through good dialogue with local authorities and those who operate or live near our offices and facilities.

We are keen to use local labour and local fellow suppliers when we carry out our projects and deliver our services, where possible.

### Sponsorship and donations

There can be many legitimate reasons for running sponsorship activities and making donations for various purposes. Some examples are profiling of our brand, support for voluntary organisations in local communities where we operate and donations to various causes that contribute to sustainable development and fulfilment of the sustainability goals.

All sponsorship activities must be rooted in the company's objectives. Decisions about sponsorship and donations must be made at the right level in the organisation, and must not involve personal gain for the decision-maker or related parties.

Sponsorship activities or donations shall not be intended or perceived as undue influence by government officials, customers or other business associates.

We must not sponsor or donate to political or religious groups.

### Protect the environment

It is the aim of OneCo for all our activities to be carried out in such a way that negative impact on the external environment is as insignificant as possible. We understand that ever greater demands are made on how we run our business. Increased focus on external environmental impact and responsible operation will require a willingness to adapt and a critical look at existing delivery models. Our work with sustainability must be built on international standards and our performance must be verifiable and binding

### Management of property, equipment, information and other resources

At OneCo, we manage significant values through the properties and buildings we have at our disposal, the equipment we use and the information we develop and receive through our business. This means that we must take good care of valuables, secure them against unauthorised persons, theft and damage, ensure necessary maintenance, and do everything we can to avoid loss and damage.

In many cases, we are also responsible for our customers' assets and facilities.

Careless use that results in loss and damage not only has financial consequences, but can destroy relationships with business partners, and also represents an unnecessary use of resources.

Our assets, including IT systems and information, must only be used for legitimate business purposes and by authorised employees.

We shall never disclose confidential information to anyone outside the company, unless such disclosure is required by law. Confidential information is information that is not, or should not be, known to the public. For example, such information may include business plans, budgets, marketing and sales programmes, recipes, design specifications and customer records



# Exercise good business practice

### Customers and quality

We must meet and treat our customers in a good and predictable manner, and our deliveries must comply with agreed requirements and customer expectations. This is important for building and maintaining trust and reputation. Customer feedback and complaints are an opportunity for learning and improvement and are always handled in a constructive and respectful manner.

### Transparency in financial reporting

OneCo is obliged to keep accurate and precise accounts and reporting in accordance with applicable legislation. All transactions must be fully and correctly documented and registered in accordance with applicable laws and generally accepted accounting principles. False or misleading entries may be treated as fraud and will never be accepted.

Our financial reporting shall provide good and objective information on status and our assessment of future opportunities and threats to all stakeholders so that they can make decisions that are based on as accurate a basis as possible. Therefore, no assessments shall be made, or transactions that are intended to mislead about the financial status of the company shall be recorded.

### Competition legislation

OneCo wants to contribute to fair and open competition. That is why we fight illegal practices such as price fixing and illegal cartels. We shall not engage in the illegal collection of non-public information that may adversely affect competition. OneCo shall facilitate fair and open competition when we compete for assignments and in our procurement processes.

We must, of course, comply with competition legislation and all relevant regulations.

### Anti-corruption

OneCo has zero tolerance for all forms of corruption. Corruption undermines legitimate business activities, distorts competition, destroys the reputation of companies and individuals, leads to imprisonment and other civil and criminal liability, and prevents respect for human rights. Therefore, we must always comply with anti-corruption laws and never offer or accept anything that could cast doubt on our professionalism and our ethical way of doing business.

### Sanctions

International and economic sanctions impose restrictions and prohibitions on trade with certain parties determined by the authorities. OneCo shall comply with all sanctions laws and regulations. This requires particular caution in the case of trade with certain countries. Sanctions provisions may include the sale and purchase of goods, services and technology as well as the exchange of information.

### Collaborators and fellow suppliers

OneCo depends on good fellow suppliers and partners in order to achieve success. It is expected that our business partners maintain the same high ethical standards as ourselves. Suppliers with a contractual relationship with OneCo must comply with laws and regulations, our requirements for health, environment and safety, the core conventions on child and forced labour, and our requirements for good business practice. Failure to comply with the requirements may result in termination of the business relationship.



Care must be taken when selecting suppliers and other partners and we must ensure that our relevant requirements for ethical business operations are contracted and followed up. We must comply with the Norwegian Transparency Act and provide good information about our work with basic human rights and working conditions in our supply chain.

### Money laundering

Money laundering hides the illegal origin of proceeds from criminal activity such as drug trafficking, terrorism, corruption and tax evasion. Criminal proceeds include not only money, but all forms of assets, real estate and intangible property arising from criminal activity.

OneCo is committed to complying with all money laundering laws. We only conduct business with reputable customers and business partners who are involved in legitimate business activities.

### Gifts and representation

OneCo does not allow gifts or entertainment and hospitality where the giving or receiving of such may influence business decisions, violate local laws or the guidelines of the recipient company, or cause others to perceive that such influence or such breach has occurred. OneCo does not expect gifts or entertainment from any of our business partners.

Entertainment and hospitality may only be accepted or offered if it is in combination with a business meeting or there is another clear business reason to participate.

Particular caution must be taken when receiving or making offers to public officials.

### Conflict of interest

A conflict of interest arises when personal interests, participation in external activities or business interests may influence decisions made on behalf of OneCo. Examples of such matters may be related to financial interests, customer/supplier relationships or positions of trust or similar roles or ownership interests.

All business transactions must be entered into solely for the benefit of OneCo. Any actual or perceived conflict of interest that cannot be avoided must be reported and made transparent.

All decisions that may involve a change in, or allocation of advantages or disadvantages for an employee, such as reorganisations, job changes, promotions, salary adjustments, bonus allocations, dismissals or relocations, etc., must be approved by the manager's manager (grandfather principle).