

## Introduction

John Dahle Skipshandel AS is an organization who wants to be known for our good values and focus on sustainable operations. With these guidelines we want to ensure that the values are passed on to our suppliers and partners, so that we can ensure that all employees in our supply chain are treated with respect, dignity, and good working conditions.

We want to ensure that the suppliers we engage with operates in accordance with internationally recognized minimum standards on human rights, labor, and anticorruption. John Dahle Skipshandel AS adhere to the principles of this Code and expect the same of its suppliers. Where there are differences between the terms of this Code and national laws or other applicable standards, the supplier shall always adhere to the higher or more stringent requirements.

It is the supplier's responsibility to ensure that the standards included in this Code of Conduct is communicated to all employees and sub suppliers as an integrated part of the supplier's own regulations and policies.

These ethical guidelines will ensure greater transparency in our supply chain, which is an important part of our collaboration. We want you to sign our Code of Conduct as confirmation that you comply with these terms.



## Chapters of the Code of Conduct

### Labor and Human Rights chapter

1. Forced labor and freedom of movement
2. Child Labor and Young Workers
3. Discrimination
4. Freedom of association

### Health and Safety chapter

5. Workplace Health & Safety
6. Conditions of Employment and Work

### Ethics chapter

7. Bribery and corruption
8. Privacy
9. Money laundering
10. Disclosure of information



## **The Code of Conduct**

### **1. Labor and Human Rights**

Suppliers to John Dahle Skipshandel AS must uphold the human rights of workers, to treat them with dignity and respect as understood by the international community.

The supplier must not participate in, or benefit from, any form of forced labor including bonded labor, forced prison labor, slavery, or human trafficking, in accordance with the ILO-conventions. Workers must have the freedom of movement during the course of their employment. Forced, bonded or compulsory labor is defined as forcing people to work against their will or under pressure from a threat or punishment.

The supplier must not withhold any part of any person's salary, benefits, property or documents (e.g. identity cards and travel documents) in order to force such personnel to continue working for them.

The supplier shall not engage in or tolerate the use of corporal punishment, mental or physical coercion and verbal abuse of personnel.

### **2. Child Labor and Young Workers**

The supplier shall not engage in, or benefit from, the use of child labor. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years.

If the supplier becomes aware that it is employing children of school age according to above established requirements, it shall ensure that the children are enrolled in a remediation program, rather than being summarily terminated from employment.

The supplier shall refrain from hiring young workers (below 18 years of age) to perform any type of work, which is likely to jeopardize their health, safety or morals.

### **3. Discrimination**

The supplier shall not engage in or support discrimination on the basis of race, color, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, pregnancy, family responsibilities, age, and disability or other distinguishing characteristics. Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement, or any other employment-related decisions shall be based on relevant and objective criteria.

### **4. Freedom of Association**

The supplier must not interfere with the workers' rights to form and join unions or other associations of their own choosing, and to bargain collectively. The supplier must recognize elected workers' representatives and bargain in good faith with them regarding all important concerns at the workplace.

### **5. Workplace Health and Safety**

Suppliers must be committed to creating safe working conditions and a healthy work environment for all their workers.

The supplier shall ensure that its workers are offered a safe and healthy working environment with adequate protection from fire, accidents, and toxic substances. Adequate health and safety policies and procedures must be established, communicated, and followed.

The supplier shall provide its employees with the protective equipment and training necessary to perform their tasks safely.

Suppliers shall comply with all the applicable health and safety related laws and regulations. Workers shall never be disciplined for raising safety concerns and for refusing working in an unsafe environment. Clear procedures shall be in place to identify, manage, record and report occupational injuries and illnesses appropriately.

Suppliers shall implement corrective actions to eliminate the root causes of injuries and illnesses. Where hazardous substances are used, relevant supervision, controls and emergency plans shall be provided.

Suppliers shall identify physically demanding tasks and evaluate and control worker exposure to these tasks. Examples of these tasks include heavy lifting and heavy material handling. Suppliers shall ensure that workers are not subject to unnecessarily poor work ergonomics, and this applies especially to physically demanding tasks.

The supplier must provide a suitable, clean, and sanitary infrastructure, including access to toilets and portable water, which conforms to the needs and numbers of its employees.

## 6. Conditions of Employment and Work

The supplier shall protect workers from acts of physical, verbal, sexual, or psychological harassment, abuse, or threats in the workplace, whether committed by managers or fellow workers including determining and implementing disciplinary measures.

The supplier shall comply with legal minimum standards or industry benchmark standards concerning wages and benefits, whichever is higher. In any case, the supplier shall always provide a 'living wage', which means that workers should be able to meet the basic needs of themselves and their dependents. Overtime shall be remunerated and clearly specified. Vacation, including time off, sick leave, holidays and parental leave shall be remunerated according to national law. Wages shall be paid directly to the employee, or someone elected by the employee, and on a regular basis. Deductions from wages shall be transparent and must never be used as a disciplinary measure.

All workers shall be provided with a written, understandable, and legally binding labor contract. The supplier shall not rely on part-time, short-term or casual laborers, trainees or false apprenticeships to pay lower wages and/or reduced benefits.

The supplier shall grant employees holiday and sick leave each year according to national laws. Women or men, who take parental leave, must not face dismissal or threat of dismissal, and shall be able to return to work in their former employment or equal at the same rate of pay and benefits.

The supplier shall ensure that the workweek is limited to 48 hours, and under no circumstances exceed 60 hours including overtime. Overtime shall be voluntary and

infrequent. Employees are entitled to at least one day off per week and shall be given reasonable breaks while working and sufficient rest periods between shifts.

## 7. Bribery and corruption

John Dahle Skipshandel AS has a zero tolerance policy on bribery and corruption. This applies to all of John Dahle Skipshandel AS business in all the countries in which we and our supplier's business operate. We strive to fight corruption and bribery through increased transparency and governance downstream in our supply chain. Our zero tolerance policy effectively means that the supplier shall not, directly or indirectly through agents or consultants, participate in or endorse any corrupt practices.

## 8. Privacy

Do not use, store or divulge any personal data without an individual consent, unless applicable laws or regulations require the company to do so. In all cases personal data must be handled and processed in accordance with the requirements set in the national regulation for privacy.

## 9. Money laundering

All employees are obliged to follow the laws, regulations, regulatory requirements and guidelines that exists to prevent money laundering and financial crime.

## 10. Disclosure of information

Our business commitment is dependent upon co-operation, mutual trust and respect between our suppliers and John Dahle Skipshandel AS. All observations, discussions and written information received from John Dahle Skipshandel AS are to be treated confidentially by the supplier, its employees and any third party organizations appointed by either side.



## Records and Documentation

John Dahle Skipshandel AS expect our suppliers to maintain appropriate records to demonstrate compliance with the terms of this Code of Conduct. To verify compliance, following records are considered the basic check list for any supplier and should therefore be made available at scheduled inspections upon request, accompanied by relevant confidentiality measures from supplier side.

- Names and ages of all workers
- Time sheets
- Payroll records including wage slips and overtime wage records
- Material safety data sheets, accident records and relevant health and safety certificates and permits
- Records of non-compliance encountered in relation to this Code, including a summary of the corrective actions taken to remedy the event

## Definition of Roles and Responsibilities

The supplier must assign responsibilities within its organization for the implementation of this Code of Conduct. As a minimum, the following representatives shall be designated:

- One or more management representatives with the responsibility and authority to ensure compliance with the terms of this Code or any comparable code.
- A qualified health and safety representative at each facility responsible for planning, implementing and monitoring the supplier's health and safety policies and procedures.
- A freely elected workers' representative responsible for facilitating dialogue and communication between the supplier and its employees on all matters pertaining to the work environment.

The supplier shall establish mechanisms for hearing, processing, and handling complaints of employees or local communities. Workers must have the right to anonymously submit complaints regarding all workplace concerns, including complaints regarding the supplier's failure to comply with this Code of Conduct, without fear of punishment or adverse employment action.

The supplier shall properly investigate, address and settle all complaints in accordance with its pre-established complaint procedure. Anyone affected by the supplier's activities must have access to communicate concerns or submit complaints without discrimination or fear of reprisals.

## Relations with Sub-supplier Contracts

The supplier is responsible for ensuring that its respective sub-suppliers comply with the terms and standards of this Code of Conduct or any comparable code.

The supplier must ensure that sub-suppliers comply with the requirements set in the Transparency Act, and carry out due diligence assessments (Human Rights Due Diligence) in line with OECD's guidelines.

The zero-tolerance standards of John Dahle Skipshandel AS outlined below are also applicable to sub-suppliers.



## Monitoring

John Dahle Skipshandel AS reserves the right to monitor the operations of our suppliers to assess and ensure compliance with our communicated Code of Conduct. Our monitoring program consists of

- on-site inspections
- periodic self-evaluations by suppliers of their premises and those of their subcontractors
- Auditing through 3rd party contractor to verify compliance

The frequency and details of supplier audits will depend on the size of the supplier and its exposure to risk elements. The supplier shall, when business relations justifies, at any time freely submit to announced and unannounced audits. The supplier is required to provide physical access to any auditor from John Dahle Skipshandel AS or party assigned by us. This obligation entails unhindered access to manufacturing facilities, relevant records, and where provided by suppliers, housing, as well as employees for confidential interviews. Where confidentiality matters are at stake, the supplier shall make its best effort to provide momentary access to relevant facilities and records to validate its compliance.

## Enforcement, Remediation and Corrective Actions

The results of all monitoring visit will be documented in a monitoring report. Where instances of non-compliance with the terms of this Code of Conduct are identified, the supplier shall be given a fixed period to take corrective action and remedy the identified gaps, as well as take measures to prevent similar problems from recurring in the future. In the event of failure to self-correct a problem, John Dahle Skipshandel AS is willing to help the supplier to develop and implement a corrective action plan, with appropriate time frame for implementation and goals to be met with.

## Zero-tolerance Standards

John Dahle Skipshandel AS will not conduct business with a supplier engaged in violations of fundamental human rights. The following practices are therefore considered unacceptable:

1. The use of bonded and forced labor, including forced prison labor and human trafficking
2. Any violation of the ILO convention C182 Worst forms of child labor
3. Any harsh, inhumane or degrading treatment or punishment of employees
4. The exposure of employees to life-threatening work environments, where they have not been informed of the dangers and where protective measures have not been undertaken
5. Any complicity in violations of international humanitarian law and other crimes against the human person as defined by international law, including war crimes, crimes against humanity, genocide, torture, forced disappearances, hostage taking and extrajudicial, summary or arbitrary executions.

## Violation of Zero-tolerance Standards

If John Dahle Skipshandel AS has reason to believe that such violations are being committed by a supplier, the business relationship will be terminated immediately. If we have reason to believe that a supplier knowingly operates in violation of fundamental human rights, the supplier will be reported to the proper authorities.

## Code of Conduct Compliance Commitment

We hereby confirm that we have received, read and understood the content of John Dahle Skipshandel AS Code of Conduct. We accept the provisions of John Dahle Skipshandel AS Code of Conduct, and take the responsibility to ensure compliance and inform our concerned employees about the content as part of our regular standards and policies.

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Signature/Date

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Company/Title

