

Code of conduct for employees and suppliers

Norwell AS follows Norwegian law, and we support the declaration of Human rights and follow the UN Global compact principles in our operations. We require that all our suppliers do the same and respects decent working conditions. Our suppliers are mainly Norwegian and must abide Norwegian law. We require our employees, suppliers and partners to operate in accordance with recognized international standards and to meet our Supplier code of conduct regarding business, employee and labor rights, environment, anti-corruption, and care for local communities, that are described in this document. We do risk assessment of our suppliers in accordance with the Norwegian Transparency act and require all suppliers to collaborate in providing information.

Our standards are the foundation of which we base our daily decisions and choices. These standards make sure that we execute our tasks in a responsible way and in a way that our collaborative partners can trust us. This foundation makes sure that we can live up to our core values that are Competent, Honest and Generous.

Norwell's employees must work for the good of the community in line with laws, regulations and the company's values and code of conduct. Norwell conducts all business activities with integrity, honesty, and transparency, avoiding any form of bribery, corruption, or conflicts of interest. We protect confidential information, trade secrets, and intellectual property rights, both within the company and when dealing with external parties.

Norwell maintains accurate and transparent financial records and complies with accounting and reporting standards and Norwegian Law.

We act in a way that ensures Norwell's credibility and integrity. The company's employees must perform their tasks and act in a way that does not damage or weaken our stakeholders' and business partners' trust in the company.

Our relationship with the outside world and Ethical Business practices

All employees and suppliers must comply with all applicable laws, regulations, and standards. It is a personal responsibility for our employees and suppliers to ensure compliance with such. Norwell keep agreements and fulfill our obligations. We are proud of our business partners. We do not talk negatively about our competitors.

Norwell does not accept any forms of bribery or corruption. We have procedures in place to uncover if we are a part of involuntary whitewashing and have good collaboration with the bank to prevent such.

If we discover any violations of human rights or corruption, we will put to action appropriate measures to stop, prevent, or limit the negative consequences.

Human Rights

Norwell treat all individuals with dignity, respect, and fairness, regardless of their background, and do not discriminate based on race, gender, religion, nationality, or any other characteristic. Any form of forced labor, child labor, and exploitative working conditions within the company and its supply chain is not accepted. Norwell upholds the principles of freedom of association and collective bargaining, allowing employees the right to express their opinions and concerns.



Whistleblower Protection and Encouragement

We all have the right and duty to report objectionable conditions. Norwell Encourage employees and suppliers to report any violations or suspected violations of this Code of Conduct through established reporting channels and procedures. We have the courage to warn and face objectionable conditions. Norwell ensures that individuals who report are protected from retaliation and that their concerns are promptly and thoroughly investigated.

Child Labor and Working Conditions.

Norwell will respect the minimum age of employment set by local law and according to the International Labor organization (ILO). Norwell will uphold legal requirements for wages, overtime pay and working hours as required in law and collective bargaining agreement with the union. Decisions regarding normal working hours, allowed overtime and required time off from work shall be in accordance with legal requirements including workers' contracts and use of temporary employment. We expect our suppliers to do the same.

Our employees have the right to form workers unions according to their own election and collective bargaining. Union representatives shall not be discriminated against or prevented in carrying out their union responsibilities.

No form of forced labor, slave labor or unwilling labor shall be enforced. Workers can terminate their employment after reasonable notice according to legal requirements.

Environment

Norwell and our suppliers have an environmental responsibility and should employ sustainable practices that minimize the environmental impact of salmon trade operations, such as responsible sourcing, waste management, and energy efficiency. Our suppliers shall comply with all relevant environmental regulations and strive to continuously improve environmental performance and practices.

Confidentiality and IT systems

Norwell Safeguard confidential information, both within the company and when dealing with suppliers or customers, and only disclose such information on a need-to-know basis.

Norwell respect privacy rights and protects personal data in accordance with applicable data protection laws and regulations. Norwell has it policy to prevent data and information to reach the wrong hands.

Electronic data stored in Norwell IT systems is Norwell's property and Norwell is entitled to read electronic information stored on Norwell's IT systems. Norwell suppliers agree that the data they send us is for our use and stored on these systems, unless other are agreed.



Continuous Improvement and Training

Norwell will regularly review and update this Code of Conduct to reflect changes in laws, regulations, and best practices.

We provide employees with training and awareness programs to ensure understanding and compliance with this Code of Conduct.