

Supplier Code of Conduct Policy

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The signatures below certify that this document has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision

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Concedo Management System Document		CON-001-PRC-PH-001	
	SUPPLIER CODE OF CONDUCT POLICY	Date:	01.09.2026
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Revision History

Rev	Date	Reason for Issue	Prepared	Checked	Approved
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Revision Control

Revision:	Paragraph /Section	Change Description

This sheet must be completed in detail, at each revision once this document has been approved. Details must include revision number, description and indication of which pages and paragraphs have been revised, date of revision approval and approval indication.

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1 Introduction and Purpose

Concedo AS shall comply with all applicable laws and regulations and conduct its business with integrity, respecting cultures, dignity, and rights of individuals everywhere we operate. Concedo strives to ensure that our suppliers and sub-suppliers share our commitment to safety, integrity, ethics, and compliance. Thus, suppliers are expected to adhere to standards which are consistent with the Concedo Supplier Code of Conduct and its key principles relevant for suppliers which are laid out in this document.

This Policy establishes the minimum standards expected of Concedo and of organisations acting on our behalf.

This Policy is supplemented by Concedo's CON-001-MGM-PH-003 Code of Conduct Policy, which also applies to the Supplier.

2 Application and Scope

This policy applies to

- All suppliers (suppliers, vendors, contractors, traders, consultants and agents)

The Supplier has an obligation to communicate the requirements to all its subcontractors, and to contribute to compliance with the requirements in the supply chain.

3 Roles and Responsibilities

Role	Responsibility
Procurement Manager	Responsible for the Policy
HSEQ Manager	Acts as Chief Compliance Officer, maintain and monitor Policy implementation and training
Suppliers	Read, understand, and always comply with the Policy

4 Acronyms, Abbreviations and Definitions

Acronym/ Abbreviation	Term / Word	Definitions
ILO	International Labour Organization	
OECD	Organisation for Economic Co-operation and Development	
UN	United Nations	

5 Statutory Requirements

All statutory requirements relevant to the activities outlined in this Policy will prevail and take precedence in case of conflicts between statements in documents referred to in this document.

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Compliance with applicable laws and regulations is mandatory, including:

- [Norwegian Penal Code](#)
- [Working Environment Act](#)
- [Petroleum Act](#)
- [Transparency Act](#)

6 Standards, Guidelines and Recommended Practises

This Policy is also guided by applicable internationally recognised principles for responsible business conduct, including the

- [UN Global Compact – Ten Principles](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)

7 Deviation from this Document

Exemption from requirements in this document is only acceptable after approval of an exemption application, which must be handled in Concedo's quality system; see:

- CON-001-HSE-QA-003 Report and Handle Nonconformities, Incidents and Improvement Proposals

The process for an exemption classified as 'minor' is quite simple, but an exemption classified as 'major' trigger a Management of Change (MoC) process which requires more analyses and more documentation. 'Minor' change in this context means that the likelihood and impact both have a value of 2 or less.

A deviation from a requirement in this document (i.e. identified after the activity has been performed) is classified as a non-conformity and must be handled accordingly; see the same process.

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8 Policy Statement

Concedo AS expects all suppliers, contractors, subcontractors, agents and other business partners to conduct their activities in an ethical, responsible and sustainable manner.

Suppliers shall comply with applicable laws, regulations and contractual requirements and uphold recognised standards relating to human rights, labour conditions, health, safety, environment and business integrity.

Compliance with this Policy is a condition of doing business with Concedo AS. Suppliers are expected to communicate these principles throughout their relevant supply chains and to cooperate with Concedo AS in due diligence, monitoring and improvement activities.

9 Key Principles

9.1 Legal and Ethical Compliance

Suppliers shall:

- Conduct business honestly, ethically and with integrity.
- Comply with applicable laws, regulations and contractual requirements.
- Maintain appropriate management systems and controls to support compliance.
- Apply recognised good practice where appropriate and where it does not conflict with applicable law.

9.2 Human Rights and Labour Standards

Suppliers shall:

- Respect internationally recognised human rights and labour standards.
- Prohibit forced labour, child labour, human trafficking, discrimination and harassment.
- Provide fair and lawful terms and conditions of employment.
- Comply with applicable requirements relating to working hours, wages, leave and holidays.
- Respect applicable rights relating to freedom of association and collective bargaining.

9.3 Health, Safety and Security

Suppliers shall:

- Provide and maintain a safe, healthy and secure working environment.
- Identify, assess and manage HSE risks associated with their activities.
- Provide appropriate information, training and resources to their personnel.
- Report and investigate relevant incidents and implement appropriate corrective actions.
- Continuously improve their HSE performance.

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9.4 Environmental Responsibility

Suppliers shall:

- Comply with applicable environmental legislation, permits and requirements.
- Identify and manage relevant environmental risks.
- Take appropriate measures to prevent pollution and minimise adverse environmental impacts.
- Seek to reduce unnecessary emissions, discharges and waste.
- Promote efficient use of energy, materials and other resources.

9.5 Anti-Bribery, Corruption and Financial Crime

Suppliers shall:

- Maintain zero tolerance for bribery, corruption, fraud and other improper business practices.
- Not offer, promise, request or accept improper advantages, directly or through intermediaries.
- Take appropriate measures to prevent money laundering and other financial crime.
- Maintain appropriate controls over financial transactions and business relationships.

9.6 Fair Competition and Conflicts of Interest

Suppliers shall:

- Conduct business fairly and comply with applicable competition laws.
- Not participate in price fixing, market sharing or other anti-competitive practices.
- Avoid actual, potential or perceived conflicts of interest.
- Promptly disclose relevant conflicts of interest to Concedo AS.

Gifts and hospitality involving Concedo personnel shall be appropriate, transparent and have a legitimate business purpose. Gifts or benefits shall not be offered in connection with tendering, evaluation or contract awards.

9.7 Whistleblowing and Non-Retaliation

Suppliers shall:

- Provide appropriate channels for their personnel to report concerns about suspected misconduct or breaches.
- Ensure that concerns are handled fairly, confidentially and appropriately.
- Not tolerate retaliation against anyone raising a concern in good faith.
- Notify Concedo AS of relevant investigations concerning activities performed under contracts with Concedo, where required by the contractual relationship or applicable requirements.

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9.8 Responsible Supply Chain

Suppliers shall:

- Communicate relevant requirements to their subcontractors and other relevant business partners.
- Take appropriate measures to ensure that their supply chain operates in accordance with applicable legal and ethical requirements.
- Conduct appropriate risk-based due diligence within their supply chain.
- Cooperate with Concedo AS in relevant due diligence, assessments, audits and follow-up activities.

9.9 Compliance, Monitoring and Continuous Improvement

Suppliers shall:

- Provide relevant information and documentation when reasonably requested by Concedo AS.
- Address identified non-conformities and implement appropriate corrective actions.
- Support Concedo AS in verifying compliance with this Policy.
- Continuously seek to improve their performance in areas covered by this Policy.

Serious or repeated breaches of this Policy may result in corrective action, suspension or termination of the relevant business relationship, subject to applicable contractual and legal requirements.

9.10 Review

The Company shall:

Review regularly and update the Policy as necessary to ensure continued suitability and effectiveness. Communicate updates to all suppliers.

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Final Audit Report

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