

## SUPPLIER CODE OF CONDUCT

### 1 Our commitment to responsible business conduct

In our business activities, AKVA group is committed to act in an ethical, sustainable, and socially responsible manner, comply with applicable laws and regulations, and practice good corporate governance and respect internationally recognized standards on responsible business conduct.

This Supplier Code of Conduct reflects our continued work and contribution towards a responsible business conduct in our global activities. Together with our Code of Conduct, this Supplier Code of Conduct provide a framework for what we consider responsible business conduct, considering AKVA group's values, policies and procedures, and applicable laws and regulations, including [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) and [the United Nations Guiding Principles on Business and Human Rights](#).

We expect our suppliers, sub-suppliers and other business partners (collectively "Suppliers" or "you") to commit to the same or similar principles in your own operations as those outlined in our Supplier Code of Conduct.

References to "AKVA group", should be understood as AKVA group ASA and wholly owned subsidiaries.

This Supplier Code of Conduct has been approved by the Management Team of AKVA group ASA.

### 2 Responsibilities and consequences of breaches

As a Supplier to us, you are expected to understand and comply with this Supplier Code of Conduct when providing services to AKVA group. Our [Code of Conduct](#) will apply to Suppliers acting on behalf of AKVA group.

You are expected to take reasonable steps to ensure that any of your sub-suppliers follow the same or similar standards as set out in this Supplier Code of Conduct when working for AKVA group.

AKVA group has the right to monitor the Supplier's compliance with this Supplier Code of Conduct. Such monitoring may take the form of for example requests for information, documentation of compliance, or onsite audits/inspections. The Supplier shall comply with all reasonable requests AKVA group may have in this connection. The Supplier shall maintain

appropriate records to demonstrate compliance with this Supplier Code of Conduct.

Any breaches of this Supplier Code of Conduct or applicable legislation will not be tolerated. Should a Supplier demonstrate improper practice or irregularity when working for us, we are committed to make necessary corrections and take remedial action to prevent recurrence. The remedial actions may include termination of our business relationship or contract, and reporting to relevant authorities.

### 3 Compliance with laws and regulations

We expect and require our Suppliers to act in accordance with applicable laws and regulations in all the countries where you operate when doing business for us.

### 4 Working environment and behaviour based on mutual respect

We expect our Suppliers to conduct business and generally behave professionally towards our employees or any other of our business associates, customers, colleagues, and others. This includes being sensitive to and respecting other cultures and customs and welcome diversity.

AKVA group does not accept any form of harassment, discrimination, or other behaviour that our employees or any other of our business associates may regard as threatening or degrading.

### 5 Fundamental human rights and decent working conditions

AKVA group expects that our suppliers respect fundamental human rights, as enshrined in internationally recognized instruments, such as the Universal Declaration of Human Rights, in their own business, and that they require the same in their supply chains. The Supplier should also abide by the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the United Nations Guiding Principles on Business and Human rights.

AKVA group expects the Supplier to respect the [eight core conventions of the ILO](#) and [the ILO Declaration on Fundamental Principles and Rights at Work](#). The Supplier shall not make use of any forms of child labour or forced labour and must take reasonable steps to ensure that its own suppliers do not engage in such practices. The Supplier shall ensure compliance with the minimum age for employment according to the law in the country where the Supplier's employees carry out their work.

The Supplier shall recognize and support relevant collective labour agreements and shall pay at least the



minimum total compensation required by local law, including living wages, all mandated wages, allowances and benefits.

All suppliers shall be committed to respecting the privacy of individuals and handle personal data responsibly and in compliance with applicable laws.

The Supplier's contracts with its employees shall be written, and in a language the employee understands. In this Supplier Code of Conduct "employees" includes any person employed by the Supplier, including, but not limited to, persons on short-term, temporary, or part-time contracts, hire of surplus labour or manning, volunteers, trainees (paid or unpaid), as well as others doing work for the Supplier who are not full-time employees.

## **6 Employee health and safety**

The Supplier shall ensure that its employees enjoy a safe and healthy working environment which shall include a fully satisfactory working environment both with respect to factors that may influence the employees' physical and mental health. The Supplier shall aim to prevent accidents and occupational illnesses, in compliance with all applicable local law requirements and international standards.

The Supplier's premises and operations shall comply with prescribed safety regulations, and the Supplier will strive to align with best practices relating to health and safety. The Supplier shall also ensure that AKVA group's employees visiting the Supplier's premises or operations are made aware of any health and safety risks and mitigating actions or instructions and provide our employees with necessary personal protective equipment (PPE).

The Supplier shall implement measures to prevent all forms of harassment and discrimination in the workplace.

The Supplier shall allow its employees to raise and react to any concerns that may represent a potential threat to or a risk to health and safety, or other forms of censurable conditions in the workplace.

## **7 Environment and climate**

The Supplier is expected to have an effective environmental policy, supporting the implementation of the United Nations Sustainability Goals, and to comply with existing legislation and regulations regarding the protection of the environment.

The Supplier should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility, including continuously striving to

decrease its adverse impacts on the environment, and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

The Supplier is expected to measure the carbon footprint of products and services sold to AKVA group, if necessary for AKVA group's reporting obligations under applicable legislation. The Supplier is encouraged to monitor, track, and document its emissions to air, water, and soil from its facilities, as well as the wastewater generated by its operations.

We encourage our Suppliers to implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. The Supplier must manage chemicals, waste and other materials posing a hazard to humans or the environment to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

## **8 Conflict of interests**

Suppliers shall supply goods or services to AKVA group in a lawful, open and transparent manner.

A conflict of interest may occur when an employee or other representative of the Supplier seeks to further their personal interest, or that of a friend or relative, due to their position as an employee/ representative of the Supplier.

Suppliers shall use all reasonable efforts to identify potential conflict of interests in their supply of goods and services to AKVA group. All actual and potential conflicts shall be disclosed to AKVA group in a timely manner.

## **9 Anti-bribery and corruption, anti-money laundering and other economic crimes**

AKVA group does not tolerate bribery or corruption in any form in the public or the private sector. AKVA group also expects that the Supplier has a zero-tolerance policy for acts of corruption which includes direct and indirect bribery, facilitation payments and trading in influence. This means amongst other things that the Supplier shall not offer, promise or give any improper benefit, favour or incentive to any person (including any public official, international organisation or other third party) in connection with the conduct of their position, office or duties, nor request, receive or solicit any improper benefit, favour or incentive from any third party.

The Supplier shall not engage in, assist or facilitate any form of money laundering, terrorist financing or other economic crimes. The Supplier shall take all reasonable steps to detect and mitigate risks of

bribery and corruption, money laundering, and other financial crimes.

## 10 Competition

We expect our Suppliers to carry out their activities in a manner consistent with all applicable competition laws and regulations, taking into account the competition laws of all jurisdictions in which the activities may have any-competitive effects and co-operate with investigating competition authorities (ref. [OECD Guidelines](#)).

Our Suppliers shall not enter into or carry out anti-competitive agreements among competitors, including agreements to fix prices, make rigged bids, establish output restrictions or quotas or share or divide markets by allocating customers, suppliers, territories or lines of commerce, or any other type of agreement or activity, including concerted practices, which would be contrary to applicable antitrust and competition laws and regulations (ref. [OECD Guidelines](#)).

## 11 Tax and VAT

Our Suppliers shall comply with both the letter and spirit of applicable tax and VAT laws and regulations in their country of residency or in another country where work for us is performed.

We expect our Suppliers to review tax and VAT compliance for themselves and their employees before starting to work for us, in particular in other countries than their residency country.

## 12 Sanctions and export controls

The Supplier shall comply with all applicable sanctions and export controls. The Supplier shall not make use of, or offer products or services subject to sanctions, and it shall not export goods in breach of applicable export controls.

Our Suppliers shall not cause AKVA group to be in violation of sanctions issued by Norway, European Union (EU), United Kingdom (UK), United States (US), Canada or the UN or other applicable sanctions regimes in connection with the supply of goods or services to AKVA group. This means that AKVA group may be refrained from working with Suppliers that do business in countries or areas subject to comprehensive or country-wide sanctions or with third parties located or registered in such countries or areas, or with sanctioned counterparties.

Supplier shall take reasonable steps to ensure compliance with this clause and relevant sanctions and export controls.

## 13 Confidentiality

Suppliers shall keep confidential and not misuse any information of a confidential nature received from AKVA group or our customer, as may be further specified in the contract between AKVA group and the Supplier.

## 14 Insider trading

The shares of AKVA group ASA are listed on Oslo Stock Exchange in Norway and we therefore require our Suppliers to comply with applicable insider trading laws.

Information that you receive from your work with us may constitute insider information about AKVA group ASA if the information has not been made public and may have a significant effect on the price of the shares of AKVA group ASA if made public.

This means that you and your employees may be forbidden to buy, sell or trade shares in AKVA group ASA pursuant to the EU market abuse regulation (no 596/2014) and applicable insider trading rules. You may further not recommend or induce someone else to buy or sell shares in AKVA group ASA.

It is also forbidden to disclose insider information to any other person, except where the disclosure is made in the normal exercise of an employment, a profession or duties. This means that you may not tell anyone about this information until it has been made public by AKVA group ASA itself.

If you breach these obligations, you may be found guilty of insider dealing or of unlawful disclosure of inside information which could lead to fines and/or imprisonment.

## 15 Whistleblowing

AKVA group encourages the Supplier, as well as its employees and sub-suppliers, to report any actual or suspected breaches of laws or regulations, or ethics violations in or related to AKVA group, via our whistleblowing channel provided at <https://www.akvagroup.com/contact/>. Such reports will be assessed and followed up as appropriate by AKVA group.

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