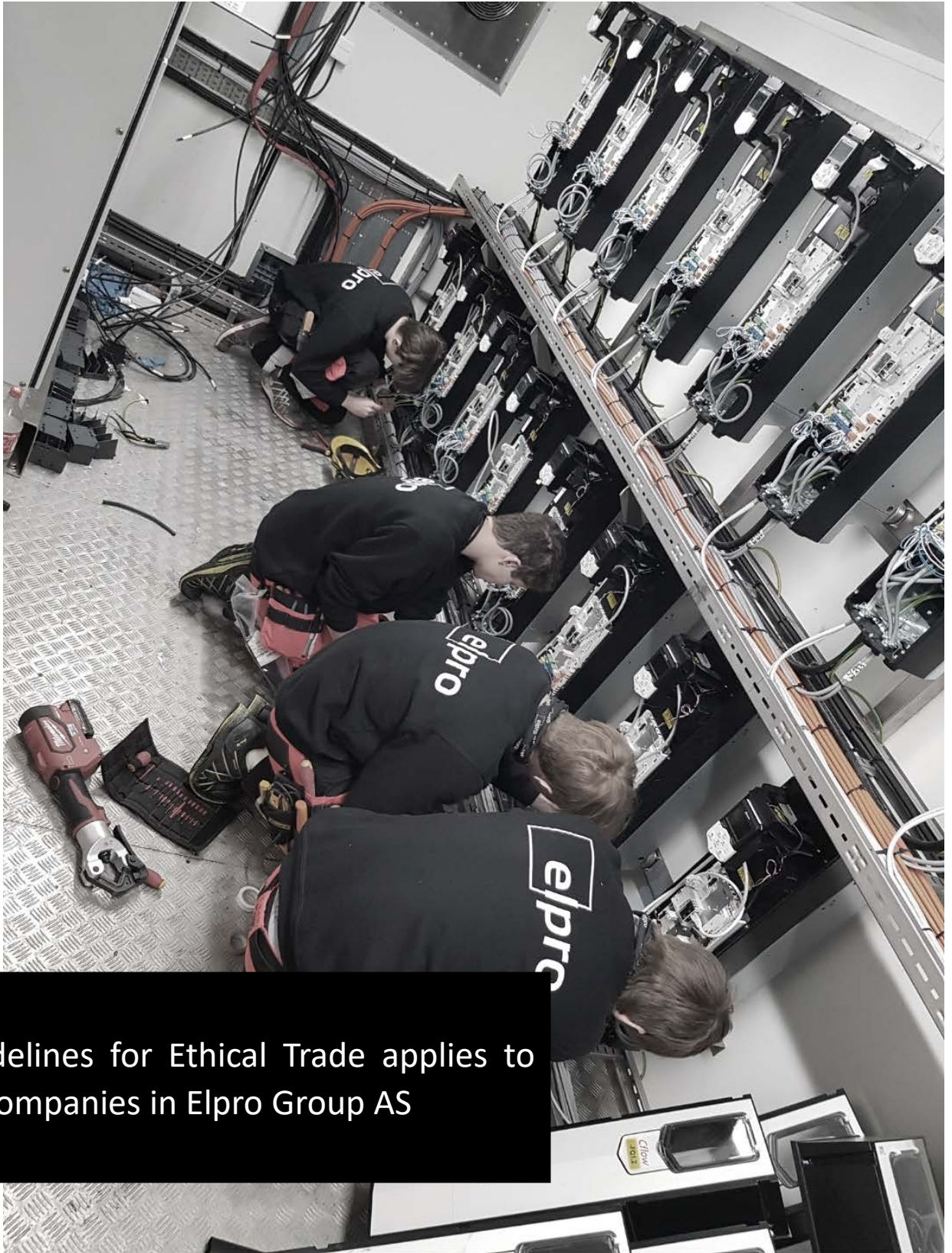




Ethical Trade Guidelines
Elpro Group AS
2025



Guidelines for Ethical Trade applies to all companies in Elpro Group AS

Guidelines for Ethical Trade for Elpro Group AS

These guidelines apply to all companies in the Elpro Group AS as well as their contractors, subcontractors and partners

The purpose of Ethical Trade is to promote sustainable businesspractice in supply chains so trade contributes to preserving human and labor rights, society, animal life and environment.

We are committed to the UN Sustainable Development Goals, and work purposefully to integrate SDGs into the Elpro Groups (guiding/governing) documents and strategy.

Our contractors have to deliver goods and services to Elpro Group AS in accordance with these guidelines. Contractors must also communicate and follow up the guidelines with their subcontractors. Social and environmental standards will be given weight to when selecting new suppliers.

Requirements

Requirements relating to the conditions of the supply chain

The requirements are built upon central UN-conventions, ILO-conventions and national workplace regulations at the site of production.

Where national laws and regulations overlap with the subject of these guidelines, the higher standard will apply.

1. Unionizing and collective negotiations (*ILO convention no. 87, 98, 135 and 154*)

- Workers shall, without exception, have the right to join or establish unions by their own desire, and to negotiate collectively. The employer shall not interfere, obstruct or counteract unionizing or collective negotiations.
- Union representatives shall not be discriminated against or be prevented in carrying out their work as union representatives.

2. Health, Environment and safety (*ILO convention no. 155 and recommended no. 164*)

- Efforts must be made to ensure workers a safe and healthy work environment. Hazardous chemicals and other substances must be handled properly. Necessary measures must be implemented to prevent and minimize accidents and health damage as a result of, or related to, workplace conditions.
- Workers must have regular and documented training in health and safety. Health and safety training must be repeated for new employees and redeployed workers.
- Workers must have access to clean sanitary facilities, clean drinking water and access to facilities for the safe storage of food.
- If the employer offers lodgings, it must be clean, safe, properly ventilated and with access to clean sanitary facilities and drinking water.



3. Wages (ILO convention no. 131)

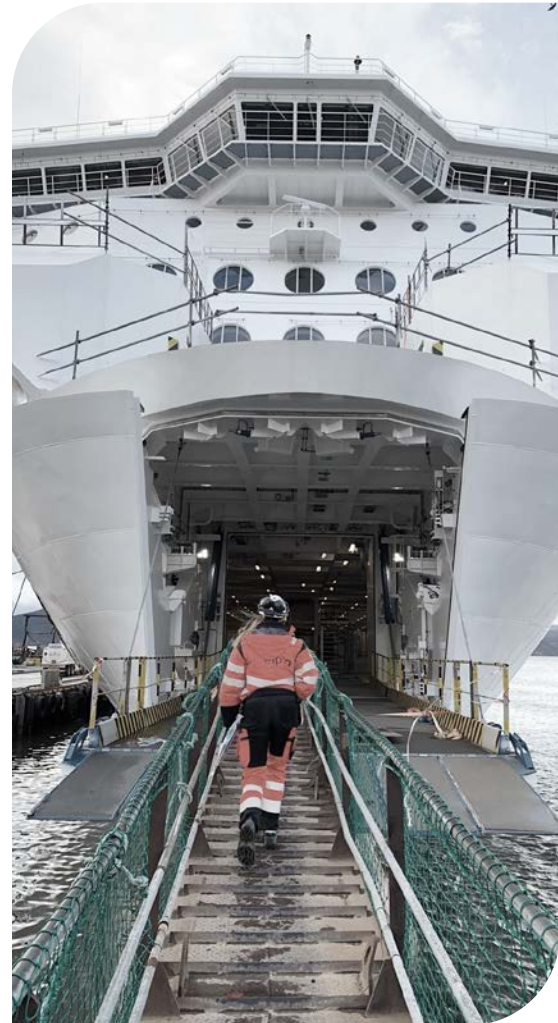
Wages to workers for an ordinary working week must at least be in line with national minimum wage regulations or industry standards, whichever is higher applies. Wages must always be sufficient to cover basic cost of living, including some savings.

Wage conditions and pay must be agreed upon in written contract, in advance of work beginning. The agreement must be understandable for the worker.

Deductions from payment as a disciplinary action are not permitted.

4. Working hours (ILO convention no. 1 and 14)

- Working hours must be in line with national laws or industry standards, and not exceed working hours in accordance with applicable international conventions. Normal working hours per week should usually not exceed 40 hours.
- Workers are entitled to at least one off-duty day per 7 days.
- Overtime must be limited and voluntary. The recommended maximum overtime is 10 hours per week, meaning a collected workload of 50 hours per week. Exceptions to this can be accepted if it is regulated by a collective agreement or national law.
- Workers are always entitled to receive overtime supplement for working hours that exceed from normal working hours, at least in accord with applicable laws.
- There must be an overview showing how much the individual employee has worked.



5. Discrimination (ILO convention no. 100, 111 and 190)

- Reporting routines for violence, harassment and discrimination must be known to all permanent and temporary employees. Routine and procedures for handling notifications must be known to all permanent and temporary employees.
- Regular surveys of working environment should reveal violence, harassment and discrimination. Management, in collaboration with employee representatives and safety delegates, must search for causes through analyses of the psychosocial working environment, and then act on adequate measures.
- Equality and gender balance is guarded by
 - everyone has, regardless of gender, disability, sexual orientation, gender identity/gender expression, religion/viewpoint, ethnicity, care duties and pregnancy/parental leave/adoption, the same opportunities for employment and career development.
 - all employees in the same professional category have the same payment regardless of gender and background.
 - women are encouraged to apply for vacant positions, and especially apprenticeships.