

Supplier Code of Conduct

Dear valued Supplier,

In Gard we believe that credibility, integrity, and trustworthiness are prerequisites for strong results. We are committed to work of high ethical standards throughout our operations, setting the same standards to business conducted by our employees, and products and services delivered by our suppliers. Our ethical principles and guidelines are embodied in the “Gard Code of Ethics and Business Conduct”, reflected in our core values and how we endeavor to conduct business: with Friendliness, Adaptability, Integrity and being Result-oriented – FAIR.

Supplier code of conduct: purpose

This Supplier Code of Conduct (or “SCoC”) is based on our internal Code of Ethics and Business Conduct, and is guided by the UN Sustainable Development Goals, UN Guiding Principles on Business and Human Rights (UNGPs), OECD Guidelines for Multinational Enterprises, ILO international labour standards, as well as the principles of the UN Global Compact. The purpose of the SCoC is to familiarize you with the standard we endeavor to achieve, ensuring your compliance not only with these standards but also with applicable laws and regulations in your area of business.

Scope

The SCoC is a set of standards stating the minimum requirements and expectations Gard has of you as a supplier. Please encourage your own supply chain partners to note and comply with the standards set out in our SCoC.

Expected commitment

We expect you to read, understand and actively seek to comply with the SCoC. Please contact us if you need further guidance concerning the meaning of any of its terms or provisions. In case of observed deviation from our SCoC, we intend to have a dialogue with you to better understand the reasons for such deviation and discuss effective corrective measures as we believe that transparency and mutual learning are the best means for improvement. If repeated or serious deviations are observed, we may consider changing supplier to ensure our alignment with prevailing laws and regulations.

Collaboration

As one of our suppliers you are part of our value chain and we truly appreciate your contribution to continued value creation for our members, clients, and ourselves. Mutual success is founded on trust and strong collaborative relationships where the parties are transparent in their expectations and dealings with each other.

I hope that you will share our commitment to strive for responsible business practices, including protection of human rights and labour rights throughout the value chain that we are a part of.

Yours sincerely,



Rolf Thore Roppestad
Chief Executive Officer



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“Together, we enable sustainable maritime development”

Respect for human rights & labour principles

Gard expects the Supplier to respect and promote human rights¹ as set out below:

Fair and equal treatment

The Supplier shall treat all employees with dignity and respect. Employees shall be given equal opportunities to develop and prosper. No employees shall be subject of discrimination due to race, religion, nationality, ethnicity, gender, sexual orientation, political opinion, disability, age, marital status, pregnancy, parental status, or union membership.

Labour rights

Gard does not tolerate child labour. The Supplier shall take measures to ensure that no child labour occurs in its own workplaces, or those of subsidiaries or own suppliers.

Employment and work must be conducted based on freely agreed terms. The supplier shall ensure that the key terms of employment are conveyed and well-understood by own employees. Gard does not tolerate any form of modern slavery, human trafficking, forced or illegal labour, recruitment fees paid to get work, other employee debt bondage to employers, or similar employer conduct that effectively forces the employee to continue a work relationship against her or his will².

The Supplier must comply with applicable legal requirements for wages and other remuneration and benefits. The employees of the Supplier should have a right to equal pay for equal work.

The Supplier is committed to pay employees at least minimum wages according to national law or customary for the industry sector, whichever is higher. In any event, wages shall at least cover the employees' reasonable cost of living.

The Supplier must comply with applicable laws (or industry standards if higher) relating to working hours.

Rights of employees according to applicable law to form or join unions or to engage in collective bargaining, shall be respected by the Supplier.

This also means allowing open communication with the employee about work-related issues without fear of reprisals or harassment and when possible, establishing an effective complaint mechanism.

Workplace health and safety

The Supplier shall provide a safe and healthy workplace, and has a duty to prevent harm, injury and damage to personnel, material, and the environment. In this regard, the Supplier shall not tolerate psychological, physical, sexual, or verbal abuse, intimidation, or harassment. Gard expects the Supplier to comply with all applicable laws and regulations. It is expected that the Supplier works with employees to improve the health and safety culture / performance.

Due diligence

The Supplier is expected to take proper actions to respect and promote human rights which includes conducting due diligence aimed to identify, assess, and mitigate any adverse impact on human rights among own employees and expecting the same of subsidiaries and own suppliers.



¹ Internationally recognized human rights that are enshrined, in "the Universal Declaration of Human Rights", "the International Covenant on Economic, Social and Cultural Rights of 1966", "the International Covenant on Civil and Political Rights of 1966" and "the ILO's core conventions on fundamental principles and rights at work".

² https://assets.eu.ctfassets.net/jchk06tdm12i/4Cw8uBjazdvSR75qqyVX9I/f40e08a01205709ab1400817f76f2b44/Gard_Modern_Slavery_Act_Statement_2024.pdf

Raising concerns & reporting questionable behaviour

In Gard, we strive for a dialogue about ethics to become a natural part of our day-to-day work, and this will include dialogue with our suppliers.

The Supplier is encouraged to report to Gard any conduct that they, in good faith, believe to be a violation of laws or this Supplier Code of Conduct. In such case, the Supplier is encouraged to work with their primary business contact(s) in Gard to resolve any concerns. If that is not found to be appropriate or acceptable, Gard's External Whistleblowing Portal may be used³.

Gard will follow-up all reported incidents and will take appropriate action where unethical behaviour is found. Gard will not tolerate retaliation against anyone who raises genuine ethics concerns in good faith.

Environmental responsibility

Gard supports a precautionary approach to environmental challenges and encourages the Supplier to undertake initiatives to promote environmental responsibility, including development and increased use of environmentally friendly technologies. It is expected that the Supplier shall comply with environmental laws, regulations, and standards that apply in their jurisdictions for their type of business.

Professional secrecy – confidential and proprietary information

It is important that the Supplier observes the laws and regulatory requirements related to collection, storage, and processing of confidential and personal information and assets. This is a mutual agreement that also applies to Gard's obligations to handle the Supplier's information confidentially and respectfully.

³ <https://dh8342.customervoice360.com/uc/admin/4223/ospe.php?SES=2b4b1a6ae07b8e3861d65e6199d016c3&syid=6271&sid=6272&act=start>

Ethical business conduct

The Supplier shall not engage in any illegal or unethical behaviour. Gard expects the Supplier to sustain standards of fair business conduct and comply with applicable laws.

Fraud

Gard promotes a culture of honesty and opposition to fraud in all its forms. Gard is committed to preventing, detecting, and reporting fraud. Gard will not tolerate fraud or unethical behaviour by its suppliers.

Bribes & similar illegal acts

The Supplier shall not, directly, or indirectly, offer or give any kind of bribe or engage in similar unlawful acts. Such acts constitute a violation of laws pertaining to Gard's business and exposes Gard, and the individuals involved, to criminal sanctions and/or civil liability. This may also seriously affect the confidence in, and reputation of, the Gard group.

Money laundering

"Money laundering" is the conversion of criminal monetary proceeds into 'clean' money so that it can be used as if it was legitimately obtained. The Supplier shall not take part in any form of money laundering and ensure that financial transactions are not used to launder money.

Terrorism financing

The Supplier shall not be financing terrorism which involves the solicitation, collection, or provision of funds with the intention that they may be used to support terrorist acts or organization. Such funds may stem from both legal and illicit sources⁴.

Openness to assessment & audits

Gard reserves the right, as mandated by duties imposed on Gard by applicable laws and regulations, to assess the Supplier's performance regarding environmental, social and governance practices. This may involve completing a self-assessment questionnaire from an external company.

⁴ Definition by the International Monetary Fund

Competition & fair dealing

Gard is dedicated to ethical and fair competition, and we expect the same from our suppliers. All antitrust and competition laws must be followed, and the Supplier cannot enter into agreements that contravenes such laws. Specifically, the Supplier shall never be part of illegal price co-operation, illegal market sharing or other practices contravening applicable competition laws.

Product and service quality

The product and services provided by the Supplier shall meet regulatory quality and safety standards (if such exist), in addition to any specific requirements related to quality, policies, specifications, procedures and contract agreed with Gard. Additionally, the Supplier is responsible for ensuring that their goods and services are procured timely, safely and otherwise in a proper manner. The same applies if the Supplier engages a third party on behalf of Gard.

Conflict of interest

As part of our commitment to ethical and fair business conduct, the Supplier should seek to avoid conflicts of interest and timely disclose to the primary business contact in Gard both actual and potential conflicts. A conflict of interest may arise when someone may be influenced by unrelated considerations in his or her work, for or on behalf of Gard, with the risk of not acting in Gard's best interest. Business decisions should be based on the appropriately balanced interests of Gard and the Supplier.

Hospitality and gifts

The Supplier shall not, directly, or indirectly, offer or request gifts, discounts, favours, services, reimbursements, or entertainment that would constitute a violation of law or that could affect, or appear to affect, the professional judgment of a Gard employee. In addition, the Supplier is not to offer gifts or entertainment to Gard employees during a tender process or other supplier selection processes. Gifts and hospitality which are reasonable, appropriate in time and circumstances, proportionate and provided in accordance with Gard Anti-Corruption Policy may be acceptable⁵.

Corporate record keeping

Accuracy in the reporting of financial results is important to Gard, and all corporate records must be true, accurate, complete, and timely verified by an external auditor. The Supplier is expected to keep accurate records of all business dealings with Gard in accordance with applicable accounting laws and regulations. The Supplier will collaborate with Gard and provide access for verification that its business dealings with Gard have been fully compliant with this SCoC.

⁵Gard is a member of, and applies, MACN principles.

Consequences of non-compliance

Gard has a duty to ensure that you as a supplier to Gard, as set out above, is aware of and complies with the laws affecting the business activities in which they are involved, and to facilitate knowledge and understanding of the laws. In case of observed deviation from our SCoC, we intend to have an open dialogue with the Supplier and discuss effective corrective measures that the Supplier should implement as soon as possible. If repeated or serious deviations are observed, Gard may consider changing supplier to ensure our alignment with prevailing laws and regulations.

Confirmation

The Supplier is expected to confirm they have read, understood and endeavor to comply with this Supplier Code of Conduct.

Supplier

Signature

Date

