

## **CODE OF CONDUCT**

### **General**

INTSOK's Board of Directors has established this Code of Conduct that applies to all INTSOK employees, advisors and consultants as well as the INTSOK Board of Directors. The Anti-Corruption Policy is a part of this Code of Conduct.

### **Human Rights**

INTSOK will ensure that INTSOK operations are conducted in accordance with the principles set forth in the Universal Declaration of Human Rights and in accordance with the ILO Declaration on Fundamental Principles and Rights at Work covering freedom of association and the right to collective bargaining, the elimination of forced and compulsory labour, the abolition of child labour, and the elimination of discrimination in the workplace.

### **Working Environment and Equal Rights**

INTSOK is committed to an inclusive work culture and appreciates and recognizes that all people are unique and valuable. INTSOK does not accept any form of harassment or discrimination based on gender, religion, race, nationality, ethnicity, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.

### **Compliance with applicable local and international laws**

INTSOK is subject to Norwegian law but also complies with applicable international law and the law of the host country where activity is conducted.

*INTSOK will encourage and assist its contractors in undertaking the necessary legal obligations to comply with applicable laws and regulations.*

### **Competition and antitrust**

INTSOK will comply with the applicable antitrust and competition laws and regulations.

*INTSOK employees, advisors and consultants are aware of applicable competition laws and standards, and are obliged to compete in a fair and ethically responsible way in all areas where INTSOK activity is conducted.*

## **Corruption**

Corruption and other unacceptable business practices may represent a challenge in markets where INTSOK and INTSOK partners operate.

INTSOK disapproves of corruption and will work actively towards its prevention during the execution of INTSOK business, with compliance and guidance by requirements and recommendations in the INTSOK Anti-Corruption Policy.

## **Conflict of interest**

INTSOK employees, advisors and consultants should strive to avoid conflict of interest situations. Situations that may lead to a possible conflict of interest, such as the personal or economic interest of INTSOK employees, advisors, consultants and their dependants, shall be avoided, and any doubts shall be discussed with one's superior. Significant economic or personal interests that may lead to conflicts of interest shall be brought to the attention of the Managing Director.

*Economic or other interests in companies and businesses that may be regarded as creating conflict of interest situations shall be reported in writing to the Managing Director for approval. INTSOK's Board of Directors shall approve INTSOK employees' board positions in advance.*

## **Confidentiality**

INTSOK employees, advisors and consultants will respect the confidentiality of information they are exposed to in the execution of their work. INTSOK employees, advisors and consultants will not make use of this information in a wrongful way. INTSOK will not distribute information that has come to its knowledge in any improper way.

*INTSOK handles information requiring a varying degree of confidentiality. The main rule is that all information is limited to INTSOK employees and INTSOK partner companies. Confidential information shall be kept and stored in a responsible way. INTSOK employees, advisors and consultants' duty to maintain information confidential shall remain in place even after their relationship with INTSOK has come to an end.*

### **Expressions of concern**

INTSOK employees, advisors and consultants are encouraged to notify their Regional Director or the Managing Director if there are concerns regarding possible violation of the Code of Conduct, or the Anti-Corruption Policy. The Managing Director will document and verify such notification under due confidentiality. INTSOK shall not in any way penalize staff who loyally and in good faith express such concerns.

INTSOK accepts that employees or others may remain anonymous if they express such concerns in good faith. An employee, advisor or others may in some cases notify the Chairman or Vice-Chairman if there are concerns regarding possible violations of the Code of Conduct. The Chairman or the Vice-Chairman will subsequently discuss the notification with the Board.

*If a possible breach of this Code of Conduct is discovered, disciplinary action may be taken after due consideration. Such action may include termination and/or legal action. INTSOK's Managing Director will handle such cases after consultation with the Board.*

### **Liability disclaimer**

This Code of Conduct and related documents do not create any legal rights for partners, customers, vendors, competitors or other persons or entities.

### **Relevant Internet resources**

#### **Business associations:**

- [The Norwegian Industrial Safety and Security Organisation \(NSO\)](#)
- [The Norwegian Financial Services Association \(FNH\)](#)
- [Risk and Insurance Management Society](#)
- [ASIS International](#)

#### **Government:**

- [The Norwegian Department of Justice](#)
- [The Norwegian police website](#)
- [ODIN](#)
- [The Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime \(ØKOKRIM\)](#)

- [The Data Inspectorate](#)
- [The EFTA court](#)
- [Lovdata](#)
- [The Norwegian Competition Authority](#)