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## 1. Purpose

These guidelines are general provisions which apply to all Fishbones employees.

Our business must meet the same ethical standards wherever in the world we operate. Employees must also ensure that the business operates in accordance with local and international laws and regulations at all locations where Fishbones is represented. Business should also be conducted in accordance with Ethical Trading Initiative Norway.

Fishbones' ethical guidelines are based on fundamental principles such as honesty and respect for other people. Our success is dependent on trust and a good reputation in the marketplace. We expect all employees to actively support our core values by acting responsibly towards colleagues, clients, partners and the community at large.

This policy outlines the main principles of what we regard as responsible behavior, but does not cover all eventualities. As Fishbone employee, you should always have the ambition to exercise great discretion, integrity, accuracy and consideration in your work for Fishbone.

## 2. Scope

These guidelines apply to all employees - including temporary employees - and everywhere in the world.


## 3. Responsibility

As Fishbone employee, it is your responsibility to ensure that you do not act or encourage others to act contrary to these policies, even though such offenses in certain situations may seem to be in the company's interest. If you are in doubt a particular course of action is legally or ethically, you should if possible seek advice in advance from your supervisor.

As a leader, it is your responsibility to ensure that all employees familiarize themselves with these policies and make sure they comply with it.

Violation of these guidelines will not be accepted, and, as embodied in relevant legislation, lead to internal reactions, termination, or, ultimately, legal action or criminal prosecution.

If the questionable practice or irregularities becomes uncovered in Fishbone, we will arrange to make the necessary adjustments and initiate measures to prevent such things happening again.

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## **4. Description**

### **4.1 Health, Safety and Environment**

Efforts to preserve the health, safety and security is an integral part of our overall business, and is based on four main principles: Responsibility for our employees, social responsibility, good customer care and productivity improvements.

All Fishbone employees have responsibility to ensure that our work is performed under safe conditions, in a manner that protects and promotes health and well-being of the individual and protects the environment.

### **4.2 Equal opportunities**

Our business is based on an inclusive corporate culture. We recognize and appreciate that each of us represents something unique and valuable and deserve recognition for their individual abilities. We do not accept any form of harassment or discrimination on the basis of gender, religion, race, national or ethnicity, cultural background, social group, disability, sexual orientation, marital status, age or political stance.

We will ensure equal opportunities when it comes to hiring, and treat all our employees in an equitable manner.

### **4.3 Personal behavior**

#### **4.3.1 Behavior based on mutual respect**

As Fishbone employee expected to safeguard your work and generally behave properly towards business partners, colleagues and others. It also means being aware and respect other cultures and customs.

Fishbone do not accept any forms of harassment, discrimination or other behavior of colleagues or business partners will be construed as threatening or degrading.

#### **4.3.2 Drugs**

Fishbone is a drug and alcohol free workplace. It means that you should not be under the influence of alcohol or drugs while you are at work for Fishbone.

However, limited amounts of alcohol is served when the local customs or events indicate that it occurs, provided that the person who takes alcohol not also have responsibility for operating machinery or installations, not driving or performing other activities which are incompatible with the consumption of alcohol.

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#### **4.4 Conflicts of Interest, and integrity**

##### **4.4.1 Financial fraud and conflicts of interest**

Fishbone employees must not seek to gain advantages for themselves (or family members) that is unlawful or in a manner which could damage Fishbone interests, whether such acts could be considered criminal or not.

You must not be involved in or attempt to influence decisions in circumstances that may cause conflict of interest or suspicion of conflict of interest. Such circumstances can be personal interest - financial or otherwise - in the case to be treated, either directly or through a third party.

As to the particularly sensitive functions and responsibilities should each business unit assess the need for routines that may reveal potential conflict of interest.

##### **4.4.2 Bribes, gifts and benefits**

You must not, in order to obtain or retain business or other improper advantage by virtue of your position, offer, promise or give any undue advantage to a public official or a business relationship in order to get them to act or not behave in a certain way with respect to its responsibility. This is true whether the benefit provided directly or through an intermediary.


Gift or other favor offered to business partners, must be in accordance with proven good business practice. Gifts and other favor can only be granted or awarded if they are of modest size (max NOK 300), in accordance with the client's corporate policy, and if the time and place is not inappropriate. Gifts and others favors must be offered in full transparency.

As Fishbone-employed you are not allowed to accept money or other benefits from business that may affect or be perceived to affect your integrity or independence. Gifts and other favor can only be received if they are small size with respect to value and frequency, and if the time and place is not inappropriate. Always inform your supervisor about gifts worth more than 300 NOK.

To be offered or received benefits in size exceeds that which can be naturally out of common courtesy, you must immediately inform your immediate supervisor, who will decide what needs to be done.

Small payments to secure or expedite a routine or necessary performance which we rightfully or otherwise entitled (lubrication), must not be made if they give the receiving improper benefits.

Do not let an agent or intermediary irregularities make payments. You need to supervise what agents / intermediaries are doing, and must have the right to terminate the relationship with them if they make use of bribes.

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#### 4.4.3 Contributions to political parties

Neither we nor any of our employees must provide financial contributions to political parties in Fishbone's name.

#### 4.4.4 Interests in other businesses

As Fishbone-employed do not have personal interests - directly or indirectly - in other industries or companies, if these interests creates doubt or may be construed to create any doubt about your loyalty to the Fishbone. Before you invest in a company that competes with or does business with Fishbone (such as a vendor), you must seek advice from your immediate superior. Particular caution must be exercised with regard to potential conflicts of interest of the kind described in section 2.4.1 above.

#### 4.4.5 Relation to rivals, suppliers and other business

You must consult your supervisor prior to participating in activities that may be perceived to be of benefit to a competitor or a supplier (or other business relationship) and to the detriment of the Fishbone interests, for example, a board member of such a company You do not have the opportunity to market your products or services in competition with Fishbone business.

You must also consult with your supervisor before you assume salaried positions (board positions, political positions, etc.) or work outside the Fishbone.


#### 4.4.6 Confidential information

Information on the Fishbone business, technology and innovation ideas can be of great value and must be managed and protected accordingly. Our general principles of openness and transparency should never be an obstacle to proper protection of information that might be of value to our business. All Fishbone employees must in this context to adhere to our procedures for technology protection.

Information on activities that are not publicly known and knowledge you acquire in connection with the performance of your duties, shall be regarded as confidential and treated as such. Of particular importance is the prohibition against the use of confidential information to gain purpose, your own or others'. As a condition of employment, all employees sign a statement of confidentiality with respect to such information.

#### 4.4.7 Protection of assets and archives

All employees and others who represent Fishbone is responsible for ensuring the assets and archival material belonging to Fishbone, our customers and other business partners. All such values must be handled with care and consideration, and with particular regard to the avoidance impairment and abuse. Use of time, materials, funds and property for the purpose without direct relevance for

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Fishbone operations must not occur without authorization from the right person in Fishbone company. The same applies to the removal or borrowing of Fishbone assets.

## **4.5 Compliance**

### **4.5.1 Respect for the rule of law - in general**

All employees must comply with international and local laws and regulations in the performance of their duties for Fishbone.

### **4.5.2 Registration and storage of information**

Fishbone wants to promote transparency and accuracy in all its activities, as well as consideration for confidentiality and other provisions are met. As Fishbone employee, it is your responsibility to provide necessary documentation of the company's operations and business relationships. It must not be false, misleading or fictitious information in Fishbone accounts and records. All transactions must be fully documented and registered in Fishbone accounts as defined in Section 5.5.3 below.

### **4.5.3 Accuracy of the periodic reporting and other public financial communications.**

Generally accepted accounting principles and guidelines from the Fishbone internal control system must at all times complied with.

All Fishbone accounts must be kept and presented in accordance with company policy as well as applicable law at each location. They must not contain any false or intentionally misleading information. They must also provide an accurate, precise and detailed expression of the company's assets, liabilities, revenues and expenses and all transactions and related events, which will be documented in detailed manner.


No information should be kept hidden from either internal or external auditors.

## **4.6 Complaints, expressed concern and exemption from punishment**

Fishbone wants to encourage open discussion about responsible behavior. Such discussion should take place in a constructive and non-bureaucratic atmosphere. It means that as a rule should address the things that concern you and any complaints you may have with your immediate supervisor. If you feel that this is not appropriate in a given situation, please contact the safety representative or a Fishbones board representative.

If you have a good faith turn to a relevant authority in Fishbone of a possible violation of law or company policy, you will be protected from sanctions by the Fishbone and all our representatives. If your inquiry leads to the detected service failure on our part, it will be presumed to your advantage that you are reporting in relation to any disciplinary action.

It will be considered violations of this policy to discriminate or harass someone for having made such

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inquiries. The improper reporting of the obvious intent to hurt anyone, you risk disciplinary action, dismissal or public prosecution.

If you feel you are in any way subjected to harassment due to report violations of this policy, contact your supervisor or safety representative.

**4.7 Responses to inquiries from the press and other**

Fishbone reputations are influenced largely by our ability to communicate in a consistent and professional manner with external parties, including the media. Fishbone will always seek to act with the greatest possible transparency, and to be honest and forthcoming in its dealings with external parties and stakeholders. To ensure a consistent communication with external parties, general inquiries about the company or its employees and all inquiries from the media referred to the Managing Director.