

HAB CONSTRUCTION AS – ETHICAL RULES

HAB is a value-driven company, where all employees at all levels must make decisions and act in accordance with HAB's values and ethical rules. HAB's core values are that we are committed, safe and socially aware. HAB's core values are anchored in the company's Policy for Sustainability, Quality, Health, Environment and Safety.

HAB "builds for the future" and future generations. HAB's influence in the industry will be used to promote working conditions, fundamental human rights, as well as solutions for nature and the environment. All parts of the business shall be based on honesty, openness, credibility and trust, as well as carried out in accordance with applicable laws and regulations.

HAB exercises social responsibility by developing and running its business sustainably in line with ethical values, respect for individuals, society and the environment. HAB takes its role in ensuring a responsible business community seriously and has zero tolerance for violations of fundamental human rights and decent working conditions.

1. Ethical and responsible business operations

All employees of HAB must comply with HAB's values, applicable laws and ethical rules. Employees must familiarize themselves with and keep up to date on the laws and ethical rules that apply. These must be complied with.

Guidelines:

- All employees at HAB act and conduct themselves in accordance with HAB's values, applicable laws, and ethical guidelines

2. Competitive conditions

No employee of HAB shall enter into agreements or engage in activities that may restrict competition in the market, or facilitate market dominance.

Guideline:

- Employees of HAB must be cautious in their contact with competitors. Do not exchange business information, such as prices, business strategy, tender info etc.
- No agreements with competitors without the prior consent of management. The same applies to agreements on prices, distribution of contracts, etc.

If an employee of HAB is offered to enter into such agreements, the employee must reject the offer and document that the request has been rejected, as well as notify management.

3. Conflict of interests

Employees of HAB must ensure that no conflicts of interest arise if someone's personal interests come into conflict with HAB's interests.

Employees of HAB shall not, directly or indirectly, receive or offer builders, suppliers, subcontractors or other partners, or any of their close associates, gifts or otherwise, except for marketing items of minimal value, which may give an undue advantage in the recipient's exercise of its position, office or assignment.

Limited hospitality of a reasonable extent in connection with the work *may* be accepted as part of building business relationships.

Guidelines:

- No benefits shall be received or given when the purpose is, or is suspected to be, to influence the recipient's behaviour or decision.
- Benefits or gifts given or received must be modest and transparent, and they must constitute a natural and useful part of the work.
- Benefits should never be given or accepted if it is linked to conditions about a specific action by the recipient.
- Gifts should never be given to people in the public sector.
- Employees must not initiate private relationships with other colleagues, who report directly or indirectly to them, without first clarifying the relationship with management.
- In the event of a possible conflict of interest, you must immediately notify management.

4. Corruption, bribery and anti-money laundering

HAB has zero tolerance for all forms of corruption, bribery and money laundering.

Employees of HAB shall not offer, promise or give any undue advantage to any person or third person in order to secure or retain a business or a benefit. This applies regardless of whether the benefit is offered directly or indirectly through an intermediary.

HAB must follow the laws that apply to prevent money laundering.

Guidelines:

- Employees of HAB shall never receive gifts or benefits that go beyond hospitality of a reasonable and limited extent.
- Employees of HAB must always exercise special caution if builders, suppliers, subcontractors or other partners are to be invited to a meal, event or the like.
- No gifts or benefirst should be given to people in the public sector.
- HAB shall use business partners who conduct legal business. Notification must be given if money is to be transferred or received from enterprises or countries with which HAB does not have a business relationship. Suspicious circumstances must be reported to management immediately.

5. General Data Protection Regulation

HAB collects and processes personal information in accordance with the Personal Data Act (GDPR), internal guidelines and routines. Confidential information must be stored in a secure manner and must only be shared with persons who have permission to receive the information.

Guidelines:

- Personal data is only stored for lawful purposes, and otherwise in line with HAB's guidelines. Always consider whether it is necessary to store personal data.
- Personal data may only be shared with other employees or business associates in cases where HAB has a lawful basis and business need.

6. Information and media management

Employees of HAB shall not speak on behalf of HAB without prior written authorization.

Everyone in HAB must be careful about conveying personal views if it can directly or indirectly weaken or damage HAB's reputation or interests.

Information belonging to HAB shall only be disclosed if there is a legitimate need and which is disclosed in HAB's interest.

Guidelines:

- Employees of HAB must never disclose confidential information outside the company, without approval from management.
- Always consider whether the sharing of information is necessary and in the interest of HAB.

- Employees of HAB must not give the impression that they are speaking on behalf of HAB in personal communication, for example on social media.
- All communication where there is a risk of identification with HAB is done in line with HAB's values and ethical rules.

7. Human Rights

HAB complies with international conventions on human rights, and works for diversity and equality.

All employees have the right to equal opportunities and to be treated equally, regardless of gender, gender identity, religion, ethnicity, sexual orientation, disabilities and age.

There is zero tolerance for mental or physical punishment, threats, discrimination, bullying, harassment and forced labour. The same applies to child labour. Employees shall have the right to organise themselves in trade unions.

Guidelines:

- Recruitment must be based on objective criteria and qualifications, such as experience and education.
- Employees are aware of their own behaviour and must not make statements that may be perceived as offensive.
- Everyone must work for a safe and good working environment, where inclusion, equality and respect are promoted.
- The management must respect the employees' right to organise, as well as respect the work of the employee representatives, without the risk of reprisals.

8. The Transparency Act

HAB is covered by the Transparency Act of 18 June 2021 no.99. HAB carries out due diligence assessments of its supply chains. The account of HAB's work on the Transparency Act can be found at www.hab.no.

Everyone in HAB must use suppliers who comply with the requirements of the Transparency Act related to decent working conditions and fundamental human rights.

Guidelines:

- Employees of HAB must only use suppliers who comply with the requirements for decent working conditions and fundamental human rights.

9. Health, Safety and Environment

HAB works continuously to prevent accidents and injuries in the workplace. All employees must work actively with safety work.

HAB has a strategy for sustainability and the environment that will ensure that there are good solutions in HAB's projects for safeguarding sustainability, nature and the environment.

Guidelines:

- Employees in HAB must participate in safety training.
- Employees in HAB actively participates in safety work and promotes a good safety culture.
- Employees must report/submit RUH if conditions are discovered that are contrary to safety.
- Employees in HAB will focus on sustainability by having an efficient use of resources, and continuously work to reduce their climate footprint.

10. Handling and follow-up

All employees of HAB at all levels must comply with the Ethical rules. Any violations of the ethical rules are assessed and followed up based on the scope and severity of the case.

In the event of suspicion of censurable conditions, or violations of laws or ethical rules, it is encouraged to report in HAB's whistleblowing channel:

<https://whistleblowing.hu.ma/dc0707bf-f624-4bc6-8495-91165bd34926>

Whistleblowing can be done anonymously. The notification is sent to the compliance officer for further follow-up, in line with HAB's routine for handling whistleblowers.

Guidelines:

- Employees must report suspected breaches of the ethical rules.