AlviGroup

Code of Conduct

Including anti-bribery, anti-corruption, and whistleblowing routines

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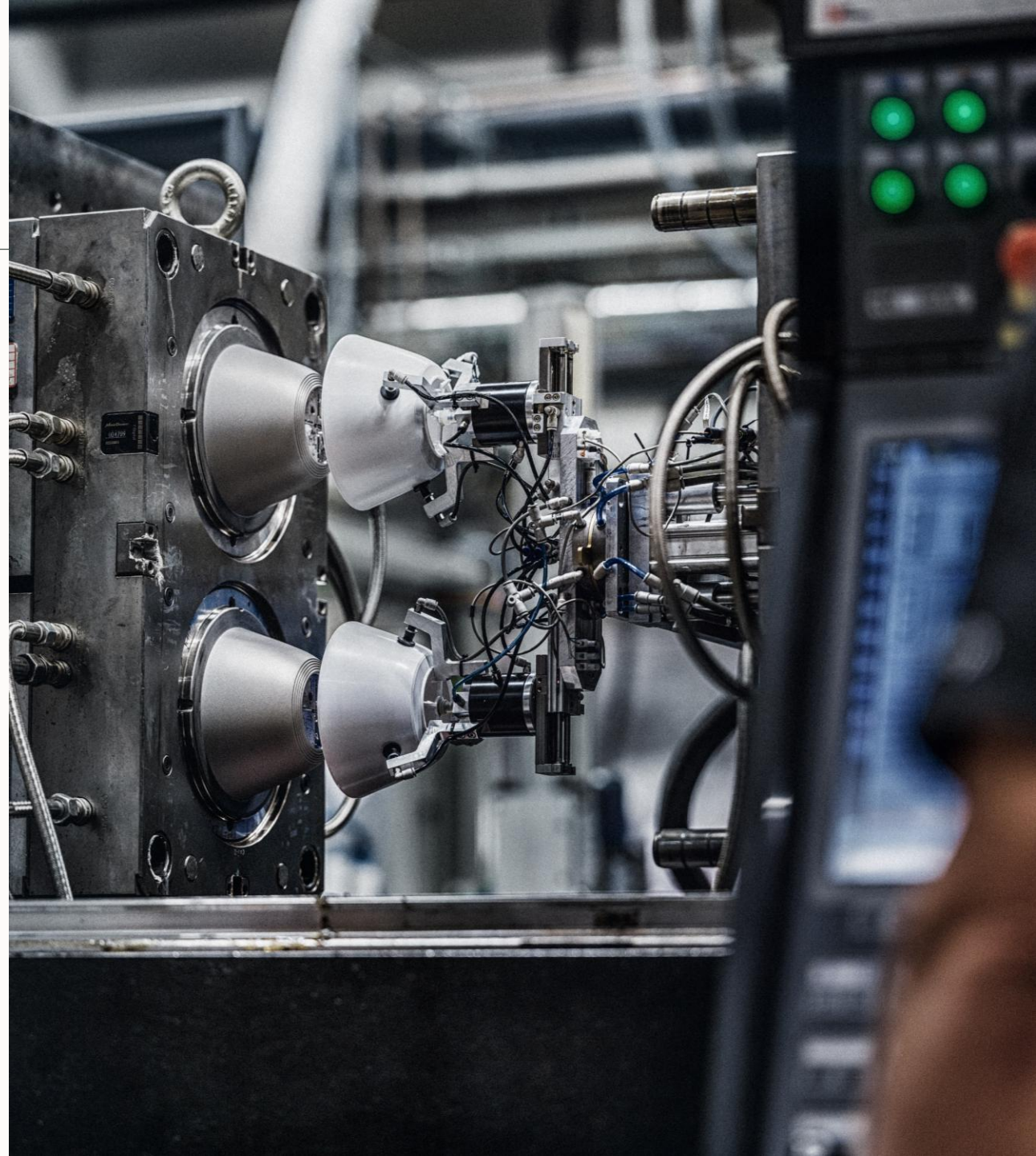

Introduction

At Alvi Group, we emphasize respect and professionalism towards clients, as well as our own colleagues. For us to thrive, we strictly adhere to our Code of Conduct. This means prioritizing the health and safety of everyone involved in our business. Ensuring that our business is conducted in a legal, ethical, and sustainable manner is incumbent for us as a company.

Alvi Group AS' Code of Conduct ("the Policy"), including whistleblowing routines, anti-bribery and anti-corruption policies, and comprehensive environmental and social guidelines, sets forth our commitment to fully comply with all applicable laws and regulations. We strive to prevent and detect bribery and corruption wherever it may arise, uphold strong environmental stewardship, and promote social well-being in all our operations. The Policy also includes routines on how internal and external personnel can report issues in a safe and protected way. We have taken a zero-tolerance approach to bribery and corruption in all our subsidiaries, and are committed to act professionally, fairly, and with integrity in all our business dealings and relationships.

This Policy applies to all persons working in or in relation to our companies, including employees at all levels, directors, and external consultants. The Policy is signed by all our employees as an attachment to their employee contracts.

Failure to comply with anti-corruption laws and regulations, as well as our environmental and social responsibilities, can have serious consequences for Alvi Group and its employees. That could mean actions such as very large fines, immeasurable damage to reputation, and even criminal sanctions such as imprisonment. Consequently, Alvi Group employees and business partners must take great care in exercising good judgment and never put themselves or others into a position which may violate this Policy.

This Policy is made available to all employees, and all employees shall be informed of the policy when joining Alvi Group. Furthermore, awareness raising and informing around the content of the policy shall be done whenever there is an update. If no update has been made to the policy, internal orientation shall be conducted on a bi-annual basis. The CEO is responsible for implementing the Policy, and the CFO is responsible for updating the policy whenever deemed necessary.

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Definitions

Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. This type of action results in matters that should be handled objectively, that is being handled in a manner best suiting the private interests of the decision maker. Bribery constitutes a crime and both the offeror, and the recipient can be criminally charged.

Corruption is the abuse of power for private gain. Corruption takes many forms, such as bribery, trading in influence, abuse of functions, but can also hide behind nepotism, conflicts of interest, or revolving doors between the public and the private sectors. Its effects are serious and widespread. Corruption constitutes a threat to security, as an enabler for crime and terrorism. It acts as a drag on economic growth by creating business uncertainty, slowing processes, and imposing additional costs. Although the nature and scope of corruption may differ from one EU State to another, it harms the EU by lowering investment levels, hampering the fair operation of the Internal Market and reducing public finances.

Conflict of interest is when you have a personal or outside interest that conflicts with the best interest of the company you represent, that is Alvi Group and our subsidiaries. A personal interest could be a financial interest in another company or in a transaction, a personal relationship, including but not limited to immediate family, or any interest or relationship that could improperly affect our judgment and decision-making.

Whistleblowing routines is a guideline for our employees and external personnel on how to report if anyone have a suspicion of a violation of the items set out in this document .

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Scope

This Policy outlines Alvi Group's standards and expectations for interactions with all External Parties, including, but not limited to, any commercial counterpart, distributors, Government Employees, and government entities. Alvi Group takes reasonable measures to ensure that all interactions with External Parties, with whom we work, demonstrate respect and compliance with anti-corruption laws and regulations, as well as our environmental and social sustainability guidelines, as set forth in this policy.

Alvi Group may be held liable for corrupt actions or significant negative environmental and social impacts caused by its employees, directors, and external consultants. Employees responsible for the selection and management of third-party relationships must therefore perform due diligence of their business partners prior to entering any business relationship. Alvi Group employees must furthermore ensure that business partners within the production supply chain commit to complying with Alvi Group's Supplier Code of Conduct, which is set out in the reporting in relation to the Norwegian Transparency Act.

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Environmental Responsibility

Alvi is committed to minimizing environmental impact as much as possible and promote sustainable practices. We adhere to the following guidelines:

Compliance
- Comply with all applicable environmental laws and regulations, and international conventions on environmental standards
- Establish and maintain appropriate environmental management systems

Resource Efficiency
- Optimize the use of energy, water, and raw materials to minimize waste and promote resource efficiency
- Implement measures to reduce greenhouse gas emissions and improve energy efficiency

Pollution Prevention
- Minimize pollution to air, water and land
- Properly manage and dispose of waste, including hazardous waste, in an environmentally sound manner

Sustainable Materials
- Strive to use sustainable materials, including recycled, renewable, and responsibly sourced materials, wherever feasible.

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Social Responsibility

Alvi is committed to upholding human rights and promoting fair labour practices. We adhere to the following guidelines:

Human Rights

- Respect and support internationally recognized human rights aligned with the UN Guiding Principles on Business and Human Rights
- Treat all employees with dignity and respect, prohibit discrimination based on race, colour, gender, sexual orientation, or any other characteristic protected by applicable law

Labour Practices

- Comply with all applicable labour laws and regulations, including those related to wages, working hours, and working conditions
- Prohibit all forms of forced labour, slavery, and human trafficking
- Prohibit the use of child labour. The minimum age of employment shall be higher than: (a) 15 years; (b) the minimum age under applicable national law; or (c) the age of completion of compulsory education
- Respect employees' rights to freedom of association and collective bargaining, in accordance with local laws
- Provide a safe and healthy workplace and implement measures to prevent workplace injuries and illnesses
- Enable employees and other stakeholders to report concerns or suspected unlawful practices at the workplace

Working Conditions

- Provide fair wages and benefits that meet or exceed legal requirements and are sufficient to meet basic needs
- Ensure reasonable working hours and provide adequate rest periods
- Promote a diverse and inclusive workforce and create a work environment free of harassment

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Expected Conduct (1/4)

By signing the Code of Conduct, all employees agree to behave according to the below expectations.

No improper incentives

- We will not offer, promise, or provide any inducements, such as payments or other things of value or perceived value to obtain an improper advantage in any of our business transactions or interactions.
- We will not select someone to provide services to, directly or indirectly, obtain an improper advantage or improperly influence or encourage a decision or action.
- Neither will we offer indirect incentives, such as those made to family members.
- There is no one definition of what constitutes an improper benefit. Whether a benefit is improper or not is decided on a case-by-case basis given the circumstances at hand. The decisive factor is whether the benefit risks to influence the performance of the recipient's professional duties.
- Special care must always be taken with public officials as the rules on bribery are stricter than with private business relations.
- The following benefits will always be deemed improper:
  - monetary gifts, loans, and vouchers
  - items and services for personal use, and on terms not in line with market conditions
  - the use of a vehicle, boat, holiday house, etc. for personal use
  - vacations

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Expected Conduct (2/4)

Legitimate Purpose

- We must have a legitimate business reason and proper motive for everything we do
- External Parties may only be engaged to provide services for which we have a legitimate business need that is defined and documented in advance, and for which such persons are appropriately qualified
- Meals, drinks, travel, entertainment, and accommodation can only be offered, provided or paid for in connection with a legitimate business reason, and only to the actual participants, and never to influence or personally benefit third parties, and always in accordance with local requirements
- While acceptable in some jurisdictions, employees may under no circumstances offer or promise so called facilitation or ”grease” payments. These are typically payments to officials for the performance of routine duties such as issuing a visa or customs permit
- Employees may not offer charitable donations, donations to political parties, or sponsorships in any form in the name of Alvi Group without approval from the CEO
- Employees may voluntarily participate in a political process. However, you may never use Alvi Group funds, assets (included, but not limited to social media channels or e-mail), services, or facilities to support any political party and shall always make clear that any expressed political view is your individual view, not the view of Alvi Group

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Expected Conduct (3/4)

Transparency & Documentation

- We ensure that all interactions with External Parties are transparent and accurately documented
- The purpose and appropriateness of any payment, gift, hospitality, entertainment, and similar arrangement must be clear and obvious
- Books, records, and accounts must accurately and fairly reflect all transactions and dispositions in reasonable detail

Reasonableness of Value, Amount and Frequency

- Anything we pay or provide must be reasonable and permissible under applicable laws and regulations
- Payments (incl. discounts or commission) must be reasonable and in line with prevailing market rates in accordance with internal control requirements. The “Fair Market Value” is objectively determined according to the standards of the relevant country
- Things of value, including gifts, hospitality, accommodation, entertainment, and travel must be permissible under applicable requirements and reasonable and not lavish or excessive in value, amount or frequency

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Expected Conduct (4/4)

Data Protection and Privacy

- Protect the confidentiality and privacy of Alvi's information and data, including sensitive company records, customer details, and employee information, safeguarding it from unauthorized access or disclosure
- Comply with all applicable data protection laws and regulations, such as GDPR (General Data Protection Regulation) and local privacy acts, ensuring personal data is collected, processed, and stored responsibly and legally.
- Respect intellectual property rights, including patents, trademarks, and copyrights, belonging to Alvi Group and third parties, refraining from unauthorized use, reproduction, or distribution.

Fair Business Practices

- Adhere to principles of fair competition and responsible business practices in all our markets, fostering healthy competition and ensuring a level playing field for everyone.
- Prohibit illegal cooperation on pricing, illegal market sharing, or any other practices violating applicable competition laws, always acting independently and transparently in our commercial dealings.

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Commitment to the UN Global Compact

Alvi Group is committed to the UN Global Compact and its ten principles across human rights, labor, the environment, and anti-corruption.

Human Rights (principles 1 & 2)
Alvi Group will conduct human rights due diligence to identify and mitigate potential risks in our operations and supply chain. We will not tolerate any form of discrimination or forced labor.

Labour (principles 3, 4, 5 & 6)
We provide fair wages, safe working conditions, and promote diversity and inclusion. We respect the right of our employees to form and join trade unions and engage in collective bargaining. We explicitly reject all forms of child and forced labour.

Environment (principles 7, 8 & 9)
We are committed to minimizing our environmental impact through efficient resource use, waste reduction, and the adoption of sustainable technologies. We will comply with all applicable environmental laws and regulations.

Anti-Corruption (principle 10)
We have a zero-tolerance towards corruption and bribery. We will conduct our business with integrity and transparency, and report on any suspected violations.

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Enforcement

Failure to follow the principles and steps set out in this Policy may result in disciplinary action, up to and including termination. In addition, breaches of anti-bribery or anti-corruption laws can have severe financial and reputational consequences for Alvi Group. Employees, who are involved and implicated in the breach, risk imprisonment and personal fines.

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Whistleblowing Process

If any questions or concerns arise regarding this policy or its application to a specific situation, employees are expected to seek guidance from their manager and, if necessary, the CFO.

If you are offered a bribe or are asked to make one, or if you suspect that any bribery, corruption, or other breaches of this policy has occurred or may occur you must raise the concern immediately. Reports made in good faith are never subject to any form of reprisal.

You should normally raise your concerns with your line manager. This may be done verbally or in writing. The concern should include full details and, if possible, supporting evidence. There may, however, be situations whereby an employee feels that he/she is unable to do this, for example when he/she feels that his/her line manager is involved, or that he/she has previously raised the alert and feels that no action has been taken about his/her concern. If the employee is in such a situation, he/she should contact a more senior manager he/she trusts, or the report the concern directly to the CFO. If the CFO is among persons involved, the concern should be raised to the CEO. If the CEO is among persons involved, the concern should be raised to the Chairman of the Board.

External personnel – that is consultants, suppliers, customers or the alike – can send a potential concern by e-mail to nta@alvigroup.no where the concern will be handled confidentially. If an internal employee feels uncomfortable with raising an issue as described above, they are encouraged to use nta@alvigroup.no to raise the concern as well.

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