



Code of Conduct

Dale of Norway AS 2022

Introduction

It is important for Dale of Norway AS that our business is carried out in a responsible manner. At Dale of Norway AS we promote decent working and environmental standards in our supply chains. We cooperate closely with our suppliers and business partners in pursuit of this aim. This code of conduct illustrates what we expect of our suppliers and business partners. The code of conduct covers human rights, workers' rights, protection of environment and corruption.

Dale of Norway AS aims to continuously improve policy and practice that supports our suppliers in complying with this code of conduct.

Dale of Norway AS is working actively with due diligence for responsible business conduct in accordance with OECD guidelines for Multinational Enterprises. Due diligence is a risk-based approach to respect and safeguard people, society, and the environment in our own operations and our supply chain. Dale of Norway AS expect our suppliers to follow the same approach.

Requirements relating to own practice

Dale of Norway AS shall conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our potential actions. If our activities are found to cause or contribute to negative impact on people, society, or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy.

Dale of Norway AS will continuously work to improve our policies and practice to enable our suppliers to be able to comply with our code of conduct.

Neither Dale of Norway AS nor any of its employees shall ever offer or accept illegal or unlawful monetary gifts or other forms of remuneration in order to secure business-related or private benefit, or benefit for customers, agents or suppliers.

Dale of Norway AS and Dale of Norway AS's suppliers shall avoid partners that operate in countries subject to international boycott by the United Nations and/or Norwegian Authorities.

Requirements – conditions in the supply chain

Dale of Norway AS's suppliers are to supply goods and services that are produced in compliance with the code of conduct. Moreover, the suppliers are to communicate the code of conduct to their sub-contractors, and to monitor implementation.

Our suppliers shall:

- Conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place must be monitored and their effect evaluated. The measures taken must be communicated to those affected by your actions. If the supplier is responsible for the negative impact/damage, they are responsible for providing remedy¹.
- Show willingness and ability to continuous improvement for people, society, and the environment through collaboration.

A supplier must be able to document compliance with the code at Dale of Norway AS's request. Such documentation may take the form of self-declaration, follow-up meetings, and/or inspections of the working conditions at production sites. The supplier will be obliged to name and provide contact information for any sub-supplier that Dale of Norway AS wishes to inspect.

In the event of a breach of the code of conduct, Dale of Norway AS and the supplier will jointly prepare a plan for remedying the breach. Remediation must take place within a reasonable period of time. The contract will only be terminated if the supplier remains unwilling to remedy the breach following repeated enquiries.

When selecting new suppliers, emphasis will be given to social and environmental standards.

Principles for responsible business conduct (code of conduct)

These principles for responsible business conduct are based on UN and ILO conventions and provide minimum, not maximum standards. National laws shall be respected, and where the provisions of law and ethical trade principles address the same subject, the most stringent shall apply.

1. Forced and compulsory labor (ILO Conventions Nos. 29 and 105)

1.1 There shall be no forced, bonded, or involuntary prison labor, slavery or trafficking of people in any form.

1.2 All work shall be voluntarily. No workers shall be kept in employment against their will and all workers must be free to leave work or terminate their employment, after reasonable notice, without reprisal.

1.3 Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.

2.2 Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law,

¹ OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3. Child Labor (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)

3.1 The minimum age for workers shall not be less than 15 and comply with

i) the national minimum age for employment, or;
ii) the age of completion of compulsory education,
whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

3.2 There shall be no recruitment of child labor defined as any work performed by a child younger than the age(s) specified above.

3.3 No person under the age of 18 shall be engaged in labor that is hazardous to their health, safety or morals, including night work.

3.4 Policies and procedures for remediation of child labor prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1 There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behavior, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

5. Harsh or Inhumane Treatment (UN convention on civil and political rights, art. 7)

5.1 Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2 Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.4 Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Wages (ILO Convention No. 131)

7.1 Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3 Deductions from wages as a disciplinary measure shall not be permitted.

8. Working Hours (ILO Convention No. 1 and 14)

8.1 Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2 Workers shall be provided with at least one day off for every 7 day period.

8.3 Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.

8.4 Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

9. Regular Employment (ILO conventions Nos. 95, 158, 175, 177 181)

9.1 Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labor, casual labor or day labor), sub-contractors or other labor relationships.

9.2 All workers are entitled to a contract of employment in a language they understand.

9.3 The duration and content of apprenticeship programs shall be clearly defined.

10. Marginalized Populations (UN Convention on Civil and Political Rights, art. 1 and 2.)

10.1 Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

11. Environment

11.1 Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport. The local environment at the production site shall not be exploited or degraded.

11.2 National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.

12. Corruption

12.1 Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

13. Animal welfare

Dale of Norway AS are aware of our responsibility for the welfare of animals when we use materials from animals. Animals shall be treated human and according to regulations.

13.1 Dale of Norway AS is against animal testing and encourages all business partners to follow our policy on this matter.

13.2 Dale of Norway AS insist that all down included in our products must be by-products of the food industry and plucked only from dead geese. We do not in any circumstances tolerate “live-plucking” of down.

13.2 Dale of Norway AS does not accept wool from sheep exposed to mulesing as procedure performed on Merino sheep to prevent fly strike.

13.4 Dale of Norway AS will only use synthetic furs.

13.5 Dale of Norway AS will not purchase leather, skins or animal fibres from areas known for bad farming practices or for transporting animals under inhumane conditions.

13.6 Dale of Norway AS will not allow any use of parts from endangered species.

14. Management systems of suppliers

The management system is the key to the implementation of the code of conduct. Dale of Norway AS emphasizes the importance of suppliers having systems that support such implementation. Dale of Norway's AS expectations in this regard are summed up in the following measures:

- The supplier should make a centrally placed employee responsible for the implementation of the code of conduct in the supplier's business.
- The supplier must make the code of conduct known in all relevant parts of its organization.
- The supplier must obtain Dale of Norway's AS consent prior to outsourcing production or parts of production to a sub-supplier/contractor, if this has not been agreed in advance.
- The supplier must be able to give an account of where goods ordered by Dale of Norway AS are produced.

15. Monitoring and auditing

The requirements of Dale of Norway AS Code of Conduct are non-negotiable and shall be complied throughout the whole supply chain including supplier and their sub-suppliers.

The supplier shall be able to document their efforts to secure compliance with the Code of Conduct, at the request of Dale of Norway AS. Such documentation may take the form of follow-up meetings, inspections, or other means of mapping the working and environmental conditions at production sites. We reserve the right to monitor the compliance of this Code of Conduct by systematic, unannounced, or announced inspections, conducted by Dale of Norway's AS personnel or independent auditors. The supplier shall be obliged to provide the name and contact

information for any sub-supplier that Dale of Norway's AS requests to map compliance with the requirements.

Dale of Norway AS understand and respect that not all suppliers can meet all expectations immediately, however we anticipate that all our partners do their best and apply a systematic process to comply with the code of conduct. If the supplier does not agree with the values in this code of conduct and are not cooperative in improving their business Dale of Norway AS will not consider this supplier as an appropriate business partner.

16. Commitment

We confirm that we have received, read and fully understood the Dale of Norway AS Code of Conduct.

We commit to comply with the Dale of Norway AS code of conduct and to take the responsibility to inform our employees and our sub-suppliers on the content of the code of conduct and to make sure that they comply accordingly.

Date

Company

Name

Signature

Title

Stamp