		Code of Con	duct		
01	24.10.24	INITIAL RELEASE	APN	HHN	HHN
COMPANY:		DESCRIPTION  TITLE:	PREP.	СНК.	APPR.
	STFO	DOC. No.: VI-GL-020			SHEET:1/8



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

## **Amendments Log:**

01	Initial Release
Rev.	Changes:



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

### Content

1	Purpose	4
2	Confidential Information	4
3	Use of company resources	4
4	Dealing with clients and suppliers	4
4.1	Bribery	4
5	IT Security and backup routines	5
6	Accurate books and accounts	5
7	Conflict of Interest, honesty and trust	5
8	Copyright and Intellectual Property (IP)	5
9	Media	
10	Human Rights and child labor	
11	Communication	
12	Ethical Relationships	
13	Discrimination	
14	Harassment and Violence	6
15	Marketing, Sales and Promotions	
16	Money Laundering	
17	Privacy	
18	Work/Life Balance	
19	Health and Safety	7
20	Corporate Social Responsibility	7
21	Reporting of violations of the Code of Conduct	8
22	Signature by the employee	8



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

#### 1 Purpose

Vestfold Invest is committed to conduct its business lawfully and ethically. Our core values are:

- Trust
- Innovation
- Excellence
- Loyalty

Vestfold Invest's reputation is the sum of the reputations of its employees, it is critically important that all its employees meet the highest standards of legal and ethical conduct.

#### 2 Confidential Information

All employees must protect the confidentiality of all client records. In addition, employees have an obligation to respect and protect the confidential nature of records regarding all personal information on employees. All employees must sign the "Declaration of Confidentiality", attached to the contract of employment.

### 3 Use of company resources

The Company's resources for example car, camera, email, internet and telephone facilities may be used by the employee to a reasonable extent.

### 4 Dealing with clients and suppliers

Vestfold Invest is committed to provide services that meet all contractual obligations and Vestfold Invest's quality standards.

When employees negotiate contracts with, or make price quotations to our clients, they should take care to ensure that all the information provided on behalf of the Company is accurate, complete and up to date.

#### 4.1 Bribery

It is Vestfold Invest's policy that personal bribes or material inducements that are aimed at influencing how business is placed, must be neither offered nor accepted by the company's employees.

Vestfold Invest prohibits its employees from personally accepting payments, such as commissions and success fees, from other parties in connection with the Company's operations or transactions entered by the Company.

Vestfold Invest's success in the marketplace results from providing quality services at competitive prices. Vestfold Invest does not seek to gain an improper advantage by offering business courtesies such as entertainment, meals, transportation or lodging to clients or suppliers of Vestfold Invest services. Employees should not provide excessive



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

entertainment to a client or the agent of a client for obtaining favorable treatment or advantage. An employee may provide or pay for the travel or lodging expenses of a client or agent only with the advance approval of the Management.

### 5 IT Security and backup routines

The Information Security Routines standards and guidelines of Vestfold Invest is described in VI-GL-022\_IT Security Routines. Reference is made hereto.

#### 6 Accurate books and accounts

All of Vestfold Invest's payments and other transactions must be properly authorized by Management and be in accordance with generally accepted accounting principles and established corporate accounting policies.

Employees submitting timesheets or expenses claims must be careful to do so in a complete, accurate and timely manner.

#### 7 Conflict of Interest, honesty and trust

Vestfold Invest employees are not permitted to take paid employment or consultancy work elsewhere unless given authorization from the Management in advance.

Investing in competitor's business is prohibited.

Unless authorized in advance by Management, Vestfold Invest employees are prohibited from appointing as suppliers or agents for Vestfold Invest, any company or business in which they or any member of their family have a financial interest.

### 8 Copyright and Intellectual Property (IP)

Vestfold Invest respect that the established laws and professional practice that secure and respect the copyright and/or Intellectual property (IP) rights in the business, is followed.

#### 9 Media

It is forbidden for staff, other than those specifically empowered to do so, to make any comment relating to Vestfold Invest or their work within Vestfold Invest to the public media including but not limited to TV, journalists and writers in social media.



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

### 10 Human Rights and child labor

Vestfold Invest will not tolerate abuse of human rights within any part of its business or supply chains.

Vestfold Invest will only employ people who are above the age of 18 years old.

#### 11 Communication

We communicate with our clients, suppliers and employees preferred person to person, by email, SMS and Smartsheet system. Our communications systems are built, maintained and used to secure clear and updated information towards any stakeholder to our company.

#### 12 Ethical Relationships

Ethical employee relationships are essential to the smooth operation of a business. This means keeping unhealthy levels of competition and personal relationships between employees out of the workplace, while providing an environment where employees feel they are treated equally and fairly.

### 13 Discrimination

You must treat your colleagues - and any other work relation - fairly and without discrimination.

#### 14 Harassment and Violence

Vestfold Invest will neither tolerate harassment nor violence among its employees or on management level of the company.

### 15 Marketing, Sales and Promotions

The marketing of our services must give the client the 'whole picture'. It must be factual; all discounts must be genuine, and the overall impression of our advertising must not be misleading. The information provided in sales must be accurate and in compliance with the law. The promotions must under any circumstance not be of offensive character.

## 16 Money Laundering

Employees of Vestfold Invest are required to be attentive to, and to report, attempts by third parties to make payments in cash or otherwise involving unusual banking arrangements or processes.



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

#### 17 Privacy

To meet the legislative requirements of GPDR, Vestfold Invest we have taken of the following actions; established a Privacy Policy on our webpages, added notification to users of cookies on our webpages and invested in an HRM system to be compliant with he requirements of storage, use and deletion of data sensitive data.

### 18 Work/Life Balance

We acknowledge the fact that life itself is a balance for employees to split their time and energy between work and the other important aspects of their lives. Work-life balance is a daily effort to make time for family, friends, community participation, spirituality, personal growth, self-care, and other personal activities, in addition to the demands of the workplace.

The pursuit of work-life balance reduces the stress employees experience. Vestfold Invest believe that an employee who doesn't make time for self-care may eventually damages their output and productivity.

Work-life balance enables employees to feel as if they are paying attention to all the important aspects of their lives. Vestfold Invest employees shall experience the flexibility of their workplace that allows them to pursue all components of a healthy life.

#### 19 Health and Safety

The system is committed to providing a safe work environment. Everyone is responsible for contributing to this environment.

#### You must:

- Report any work place injury that occurs.
- Report any situation that poses danger/injury to yourself or others.
- Be aware of safety standards and follow them.

Employees and contractors are expected to report for work and perform assigned duties free from the effects of alcohol and drugs.

Reference is made to VI-GL-027 Health and Safety.

#### 20 Corporate Social Responsibility

The relationship between a company and society is such that a company owes its existence to society. Accordingly, a company's conduct must be evaluated against social values and norms. A company should behave as a member of society, and such behavior should accord with corporate social responsibility. Vestfold Invest focus on recycling waste paper, energy conservation (turning of lights, computers and printers when not in use) and minimize waste wherever possible.



Company:	Vestfold Invest AS		
Title:	Code of Conduct		
Doc. No.:	VI-GL-020	Rev.	01

# 21 Reporting of violations of the Code of Conduct

Any employee violating this Code of Conduct will be subject to disciplinary action, up to and including dismissal from employment.

# 22 Signature by the employee

Signature: _	Haus Halian	Nav	 Date: 24.10.24

Name in block letters: Hans Håkon Norr