

# **ELIT AS' Code of Conduct**

#### **Introduction and Purpose**

ELIT AS is committed to conducting business in compliance with applicable laws and regulations, and to promote a work environment that fosters equal opportunities, inclusion, respect, and accountability. The ethical guidelines are intended to ensure that ELIT AS complies with the provisions of the Transparency in Business Act and works with fundamental human rights and decent working conditions. The background for the law is the ILO conventions 1, 14, 26, 29, 79, 87, 95, 98, 100, 105, 111, 131, 135, 138, 143, 154, 155, 158, 169, 175, 177, 181, 182, and 183, ILO recommendations 146 and 164, the UN Convention on the Elimination of All Forms of Discrimination against Women, and the International Covenant on Civil and Political Rights, articles 1, 2, and 7.

# Confidentiality

Employees at ELIT AS have signed a confidentiality agreement and are therefore bound by loyalty and obligated not to use, disclose, or otherwise make available information about ELIT AS's trade secrets, or other personal data to unauthorized individuals. Employees must exercise caution in discussing matters they become aware of or experience during their work. Confidentiality also extends to ELIT AS's customers and suppliers. Employees must not share information without approval and must take all necessary precautions to protect data and privacy.

The duty of confidentiality will also apply after any termination of employment. For more information on this topic, please refer to the internal guidelines and procedures instruction available in our management system (PlusOffice).

# Accountability

All employees at ELIT AS shall act honestly and with integrity in all matters, both internally and externally, and take responsibility for their own actions. Employees should exercise good judgment and avoid behaviours that may appear inappropriate.

It is a shared responsibility to contribute to a good work environment. Therefore, everyone is encouraged to do their part to prevent conflicts from escalating and to be able to accept criticism in a responsible manner.

#### Respect

As an employee at ELIT AS, one must act responsibly towards everyone in the workplace, including customers, suppliers, and other partners. We shall maintain an



inclusive and diverse work environment and treat individuals with respect regardless of background, gender, age, ethnicity, religion, or sexual orientation.

ELIT AS and our suppliers shall commit to a workplace free from harassment and discrimination. ELIT AS and our suppliers shall not threaten employees with or subject them to harsh or inhumane treatment, including but not limited to, sexual harassment, mental and physical coercion, and verbal abuse.

# **Environmental Protection**

ELIT AS is committed to reducing our environmental impact in all stages of our value chain, from production through transportation, sales, delivery, and use of our products and services. For more information on how we continuously work to minimize our environmental footprint, please read our sustainability and environmental policy, available in our management system (PlusOffice).

# **Chemical Management**

ELIT AS and our suppliers shall comply with all applicable laws and regulations such as REACH and RoHS that prohibit or restrict the use or handling of specific substances. To ensure safe handling, moving, storage, recycling, reuse, and disposal, ELIT AS and our suppliers shall identify and list concerning chemicals (any presence of such substances shall be documented and reported via prescribed response form) and comply with applicable labelling laws and regulations for design, production, recycling, and disposal.

#### Waste Management

ELIT AS and our suppliers shall handle and dispose of hazardous and non-hazardous waste from operations in accordance with applicable laws and regulations. Waste shall be stored, handled, transported, and disposed of in a manner that protects workers' health and safety and the environment. Waste shall not be deposited on-site. Hazardous and non-hazardous waste shall be stored separately. Records of how, where, how much, and by whom the waste is treated shall be made available upon request. Opportunities to reduce, reject, reuse, and recycle waste shall be identified and implemented.

# Water Management

ELIT AS and our suppliers shall have information on the type of incoming water used and how, where, and by whom wastewater is treated. ELIT AS and our suppliers shall monitor, control, and treat wastewater generated from operations in accordance with



applicable laws and regulations. ELIT AS and our suppliers shall take necessary precautions to prevent contamination of stormwater runoff from their facilities.

# **Energy Efficiency**

ELIT AS and our suppliers must strive to use energy more efficiently. ELIT AS encourages suppliers to set energy efficiency goals and monitor electricity and energy consumption, turn off equipment when not needed, and reduce energy consumption where possible.

# **Mineral Sourcing**

ELIT AS avoids purchasing high-risk minerals such as tin, tantalum, tungsten, gold (3TGs), and cobalt, from conflict-affected and high-risk areas (as defined and listed by the OECD). Suppliers are required to exercise due diligence on the source of these minerals present in their products throughout the supply chain and make their actions available upon request.

# **Anti-Corruption and Bribery**

ELIT AS and our suppliers shall not violate any international anti-corruption conventions and the applicable anti-corruption laws and regulations in the countries they operate in, and they shall not engage in corruption, extortion, or embezzlement in any form. ELIT AS and our suppliers shall maintain fair business standards in advertising, sales, and competition. ELIT AS and our suppliers shall uphold good business practices and high ethical standards, above all in accordance with these ethical guidelines. ELIT AS expects our suppliers to avoid conflicts of interest that may compromise the supplier's credibility with ELIT AS or other external parties' trust in ELIT AS.

# **Human Rights and Labor Practices**

We at ELIT AS are committed to respecting and promoting human rights in all our operations and for all our employees. We recognize the importance of ensuring fair working conditions for all our employees, including the right to fair pay, safe working conditions, and the right to organize professionally.

ELIT AS and our suppliers shall not deal with persons or use any form of child, forced, bonded, or prison labour. All work shall be voluntary, and employees shall be free to leave employment or resign with reasonable notice.

# Work Environment, Working Hours, and Wages



ELIT AS is committed to complying with all applicable laws and regulations regarding working hours and wages. We respect the rights of our employees and ensure fair compensation for work performed.

# **Health and Safety**

To promote a safe working environment, employees shall receive necessary health and safety information and training in the workplace, including written health and safety information and warnings, in the primary language of the employees. ELIT AS and our suppliers shall provide safety data sheets for all hazardous or toxic substances used in the workplace, in the main language of their employees, and provide training to employees who may come into contact with such substances. ELIT AS and our suppliers shall provide workers with appropriate personal protective equipment (PPE) and train workers on its proper use.

# **Accident Prevention and Preparedness**

ELIT AS and our suppliers shall identify, assess, and prevent hazardous situations and incidents, and minimize their impact by developing emergency plans and procedures, including procedures for accident reporting. Notification and evacuation procedures shall be developed and training and drills shall be conducted for employees. First aid equipment shall be available, and fire detection and extinguishing equipment shall be installed and in order. All workplaces shall have adequate evacuation routes that are marked. Employees shall be trained in how to handle emergency situations and be aware of risks associated with their job tasks.

# Lack of Compliance

It is expected that all employees at ELIT AS follow these guidelines in all their business transactions and tasks. We encourage our employees to report any concerns about breaches of these ethical guidelines or other inappropriate behaviour. Undesirable events should be reported to the managing director and, if applicable, the safety delegate.

ELIT AS reserves the right to terminate relationships with suppliers that violate these ethical guidelines. If an employee has breached the employment contract or the guidelines at ELIT AS and the violation is considered serious, a written warning will be issued and may result in disciplinary action, termination, or dismissal. The employee will be presented with the information the warning is based on and given the opportunity to make comments. If the employee believes that the warning is incorrect or incomplete and wishes to make written objections, ELIT AS follows the data protection authority's



recommendation and stores it together with the warning in the management system (PlusOffice).