



Code of Conduct

These guidelines are intended to support Griptel management and employees in performing their tasks and making decisions. If anything is unclear, advice and guidance should be sought from the immediate supervisor.



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Code of Conduct

The long-term success of our business depends on the trust and confidence of our customers and other stakeholders. It is our responsibility to ensure that our behavior aligns with the values we stand for and complies with both Norwegian and international laws. Griptel's Code of Conduct outlines the ethical principles that guide our business operations, and the behavior expected of our employees and anyone acting on behalf of Griptel.

Griptel's Code of Conduct adheres to the UN's 10 Principles for Responsible Business, European data protection legislation (GDPR), as well as Norwegian laws and guidelines. Relevant laws include the Working Environment Act, the Equality and Anti-Discrimination Act, the Holiday Act, the Transparency Act, and the Penal Code.

Our Values

Communication

- We are open and share information for mutual benefit
- We listen
- We are clear
- We give and ask for feedback to develop and learn

Trust

- We tell it like it is
- We never take shortcuts
- We deliver quality in everything we do

Commitment

- We offer the highest quality and best prices for our customers
- We take responsibility for our results, both good and bad
- We continuously work towards our vision

Ambition

- We are creative and seek new ways of working to ensure that we develop as a company
- We seek new opportunities
- We work in teams and utilize each other's strengths to solve our tasks

Ethical Principles

Griptel shall only engage in activities that comply with laws and regulations, contractual agreements, and the company's own guidelines for business ethics.

Griptel and all employees, shall promote honesty, integrity, loyalty, and fairness in all interactions with customers, colleagues, and other stakeholders.



Prohibition of Corruption, including the Receipt of Gifts and/or Services

Any form of misuse of power or position to gain personal or business-related benefits is considered corruption and is not accepted. This also includes the receipt of inappropriate gifts, services, or other benefits, such as paid trips or other sponsored activities. Small gifts that would seem impolite to refuse may be accepted, as well as work-related activities or lunch at business meetings. If you feel uncertain about an activity, a service or a gift, please contact the company's management.

Conflict of Interest

Managers and other employees shall not participate in activities or influence decisions where a conflict of interest may arise between the company's interests and the employee's personal interests, whether these are financial or of another nature. Please seek advice from Griptel's management if you feel in doubt.

External Engagements

Any external engagement of the employee must not interfere with the performance of their duties and responsibilities. Such external engagements must also not undermine the trust in the company. In case of doubt, the employee should provide information about external engagements to their immediate supervisor.

Equality, Diversity, and Prohibition of Discrimination

Discrimination or harassment is not tolerated. Griptel actively promotes an open and inclusive work environment regardless of gender, ethnicity, pregnancy, parental leave, sexual orientation, religion, union affiliation, or other group-based characteristics. At Griptel, we recognize that diverse backgrounds, skills, and personalities are essential elements for an innovative company.

Privacy and Personal Data Protection

All personal data is processed in accordance with the European Data Protection Regulation (GDPR), which imposes strict requirements on the collection and storage of personal data, as well as individuals' rights to access and delete personal data.

As an employee, you may in certain situations become aware of personal data related to your colleagues, our customers, users, and clients. It is important that you handle personal data in accordance with privacy regulations.

All employees must:

- Familiarize themselves and comply with Griptel's privacy policy
- Not share information with anyone other than those who need it based on their position within our company
- Never leave personal data/documents on their workstation, on a copier, or printer where others may see them
- Lock their computer when leaving the workstation
- Regularly review personal email account and delete emails that no longer need to be retained
- Report any suspected violations Griptel's Privacy policy



Social Media Policy

As employees of Griptel, it is essential to remember that we represent the Griptel brand at all times. We should be mindful of how we respond, communicate, and speak about Griptel, both during work hours and in our personal time, including on social media channels.

Safety and Management

At Griptel, we are committed to creating a safe, healthy, and positive work environment for all employees. The Managing Director holds the ultimate responsibility for the company's health, environment, and safety (HSE). Additionally, the HR Manager, each individual leader, and the Safety Representative have specific responsibilities in this area.

We implement preventive measures through safety observations at the office and warehouse, and by keeping safety as a constant agenda item. We regularly conduct internal and external HSE inspections where we systematically review risks, conditions, and assess necessary actions. We continuously work to improve our procedures. Griptel has a dedicated HSE handbook available to all employees that outlines all aspects of the company's safety efforts. All employees at Griptel are required to familiarize themselves with and adhere to the company's HSE procedures. They also have a duty to report any significant breaches of the HSE regulations.

Environment and Sustainability

Griptel actively works to reduce its environmental impact through emission reductions and efficient resource use. All vehicles owned by Griptel are electric, heat pumps are used for heating the office and warehouse, and effective waste recycling procedures are in place. Griptel annually publishes a sustainability report with detailed information on emissions and environmental measures.

Whistleblowing

We encourage all employees to report issues of concern within the organization. Examples of issues that should be reported:

- Threats to life and health
- Corruption or other financial crimes
- Unsafe working conditions

In addition to your right to report concerning issues, in some cases, it is mandatory to report. This applies if you witness harassment or discrimination, or if you become aware of other situations that could pose a threat to life or health.

Reports can be submitted verbally or in writing to your immediate supervisor or to the Safety Representative. You may also submit the report to the supervisor's superior or to the HR Manager.

The person who has made the report should be notified as soon as possible, and no later than within 3 days, that the report has been received and that the matter is being reviewed. Griptel

is committed to investigating the issues in a timely manner. What constitutes a reasonable timeframe depends on the severity of the issues.

Griptel will ensure that the whistleblower should be safeguarded against retaliation from colleagues or negative consequences from the company. This is regulated under the Norwegian Working Environment Act, §2 A4 – 2 A5.

Monitoring and Responsibility for the Code of Conduct

- The Board of Directors, through the Managing Director, holds the overall responsibility for the Code of Conduct and ensuring that guidelines are followed
- Each employee is required to familiarize themselves, and adhere to the guidelines
- Each manager is responsible for ensuring that the guidelines are known and followed within their area of responsibility. The manager should also lead by example. If there are breaches of the guidelines or if an undesirable practice/culture develops within the company, the manager must ensure that this is addressed immediately
- Each manager should also assess and, if necessary, propose more detailed guidelines for the areas of the business they are responsible for. Any additional guidelines must be approved by the Managing Director

Consequences of Breaching the Guidelines

Breaches of these guidelines and any associated instructions may result in disciplinary action, including warnings, dismissal, or termination. In this context, all managers have a special responsibility to help protect employees who uncover and report concerning issues.

Bærum, 16 /10 2024
On behalf of the board of Griptel



Johan Ditlef De Vibe
Chairman of the Board



Pål Bjørdal
CEO