

SUPPLIER CODE OF CONDUCT

BDO AS and BDO ADVOKATER AS

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Introduction

For BDO, our suppliers and business partners are central to our ability to carry out our business. BDO's desire is that our business relationships are based upon trust and openness, and that our suppliers share our attitude towards ethics and compliance.

BDO's ethical guidelines and expectations incorporated into this code of conduct for suppliers (hereafter "Supplier Code of Conduct") express our expectations and determine our requirements to all suppliers and business partners (hereafter "Suppliers"), including the Suppliers' employees, board members, hired staff and consultants working on assignments for a Supplier to BDO.

BDO's Supplier Code of Conduct is based on applicable laws and regulations, central United Nation conventions, and the International Labor Organization Conventions (ILO). BDO is a member of the UN Global Compact and adheres to the ten principles of the UN Global Compact when carrying out activity. BDO expects that our Suppliers comply with applicable legislation, respect internationally recognized human rights, and follow ethical standards corresponding with the material content in our Supplier Code of Conduct when they work for or together with BDO. BDO expects that our suppliers adhere to the ten principles of the UN Global Compact. Suppliers shall also ensure that equivalent standards are communicated to and made applicable for subcontractors that are contributing to work for BDO.

BDO's ambition is to be a promotor of the UN sustainability goals through a sustainable development of the firm's own activities, the commercial sector and society. BDO expects Suppliers to contribute with relevant information related to sustainability, as well as allowing BDO to carry out audits and visits to observe the Suppliers' operations and sustainability related activities. Further information about BDO's work for sustainability (in Norwegian) can be found [here](#).

Laws and regulations

BDO's Suppliers are expected to have guidelines corresponding with BDO's Supplier Code of Conduct, international recognized conventions, and relevant national legislation in the countries where the Suppliers operate. A Supplier's business activity shall be legal.

Where national legislation and standards do not correspond with the Supplier Code of Conduct, the Suppliers shall always comply with the strictest requirements, provided that they do not conflict with applicable legislation.

Environment and Climate

It is BDO's wish to be a socially responsible company carrying out climate and environmental related measures such as Eco-Lighthouse certification and work to promote sustainability (see introduction).

Suppliers shall comply with all statutory environmental standards. Suppliers are expected to have a precautionary "better safe than sorry" approach towards pollution, environmental risks, and other environmental and climate challenges. Suppliers shall take initiative for greater environmental responsibility. Suppliers are expected to take reasonable steps to monitor and aim at minimizing negative environmental impact from their business activities. Suppliers shall encourage development and use of environmentally friendly technology.

Human and Labour rights

BDOs Suppliers shall support and respect internationally recognized human rights and decent working conditions. The Supplier must ensure that it does not make itself part of any human rights violations.

Freedom of association and collective bargaining (ILO conventions no. 87, 98, 135,154 and UN Global Compact principle 3)

BDO's Suppliers shall ensure and recognize the right to freedom of association and collective bargaining. Suppliers shall respect workers' rights to establish or join labour unions and employee organizations.

Employees shall have the right to negotiate collectively, without fear of threats or reprisals. Suppliers shall not discriminate employee representative or trade union members, who shall be allowed to conduct their work as a representative at the workplace.

Should the right to freedom of association and collective bargaining be limited due to national legislation, the Supplier shall ensure that the employees are free to elect their own representatives.

Forced labor (ILO conventions no. 29,105 and UN Global Compact principle 4)

BDO's Suppliers shall not use any type of force towards employees or persons in their service and shall support the abolition of all forms of forced and compulsory labour. Suppliers shall ensure that employment relationships between employees and the Supplier are voluntary and without any kinds of threat. Suppliers shall ensure that all employees are free to leave their workplace or end their employment after notifying the Supplier thereof in a reasonable manner.

Employees shall not be obligated to deposit money, identification papers or similar for the purpose of being hired or to maintain an employment relationship.

Child labor (UN convention on the rights of the child, ILO conventions no. 138, 182 and 79, ILO recommendation no. 146, and UN Global Compact principle 5)

Suppliers shall not use child labor and shall support the abolition of child labour. "Child" means a person being below the age of 15 years, younger than the minimum age for finishing compulsory education or under the legal age of employment in the country in question. The higher of the above-mentioned age alternatives shall apply. If a Supplier has employees under the age of 18 years, the Supplier must be able to document that such employees do not perform tasks than can be harmful to their health or dangerous, including overtime and nightshifts.

Prohibition against discrimination and harassment (ILO conventions no. 100 and 111, and UN Convention on the elimination of all forms of discrimination against women, and UN Global Compact principle 6)

Suppliers shall promote equality in employment processes and have zero tolerance for direct and indirect discrimination and harassment, and prevent unfair dismissals.

Suppliers shall treat all employees fairly and strive for a gender balance, diversity, and inclusion throughout their whole organizations and on all management levels. Suppliers shall act if deviations are observed. The Supplier shall support the elimination of discrimination in respect of employment and occupation.

Terms of employment

Suppliers shall pay their employees in accordance with any applicable national standard for minimum wage. Salaries shall be agreed in writing and paid to the employees at the agreed time.

Suppliers shall ensure that all employees have a written contract of employment describing the terms and conditions of the employment in a language that the employee understands. The agreement shall include information required by national legislation and, at a minimum, contain information about the position, place of work, salary, hours of work, weekly rest days and statutory holidays.

Hours of work (ILO conventions no. 1 and 14)

Suppliers shall ensure that statutory labour working hours regulations are met and that hours of work are in line with applicable national legislation or collective bargaining agreements. Mandatory overtime shall be restricted, and Suppliers shall ensure that employees consent to any overtime.

Suppliers shall respect and comply with applicable legislation, international conventions and collective agreements, if applicable, on hours of work and breaks, including overtime and vacation, sick leave and parental leave and other applicable provisions on absence.

Suppliers shall respect employees' need for restitution and ensure that all employees have the right to a satisfactory vacation with a pay that as a minimum corresponds to applicable national/international legislation.

Health, safety and environment

Health, Safety and Environment is very important for BDO. Suppliers shall provide for, and maintain, a safe working environment in accordance with applicable legislation and encourage good health and safety practice.

Suppliers are expected to establish proper measures to prevent accidents and occupational diseases as well as ensuring that statutory insurance policies are in place. Work-related accidents shall be reported to relevant authorities, investigated, and preventive measures shall be implemented.

Suppliers are expected to have a written policy, employee handbook, declaration or similar that covers health and safety and is communicated and made available to all employees and stakeholders.

Ethical business activities

Business integrity

BDO's Suppliers are expected to act ethically, responsibly, fairly, and professionally at all times. Suppliers shall respect legislation that regulates their business and shall avoid harming human life, the environment and BDO's reputation. It is expected that the same standards are met when any subcontractors are used by Suppliers to provide goods or services to BDO.

Anti-corruption

BDO has no tolerance for corruption and trading in influence. Bribes shall not occur between ourselves and our business relationships. BDO's Suppliers shall actively work against and dissociate themselves from all forms of corruption and comply with laws and regulations applicable to bribes, corruptions, anti-money laundering, fraud, extortion, and other illegal business activities.

Suppliers shall not offer, request, promise, receive, or give any form of undue benefit, services, or incentives to anyone for the purpose of acquiring personal or business-related advantages. This applies regardless of whether the benefit is being offered directly or indirectly through others.

Suppliers are expected to develop and implement anti-corruption guidelines, internal control measures and training customized to their business activity.

Anti-money laundering and tax/duties etc.

BDO's Suppliers shall actively oppose any form of money laundering and implement reasonable measures to prevent their business from being used for money laundering or terrorist financing. Suppliers shall adhere to applicable tax legislation and not contribute to tax evasion, or otherwise unjustly acquire public funds.

Competition

BDO's Suppliers shall comply with competition laws and not cause or be part of violations of such, for example by participating in illegal price or market cooperation or other activities in breach of legislation regulating competition.

Conflicts of interest

Suppliers shall avoid conflicts of interest while working on assignments for BDO. Suppliers' business decisions shall not be motivated or influenced by personal relationships or conflicts.

BDO's Suppliers shall without undue delay inform BDO about any circumstances that can affect their independence, or that may create, or appear to be, a conflict of interest while conducting an assignment for BDO.

Data protection and information security

Suppliers shall adhere to applicable data protection and information security legislation when collecting, storing, transferring, sharing, or otherwise processing personal data.

Suppliers shall have adequate routines and systems that ensure that wrongful appropriation, use or sharing of data or information does not occur. Suppliers shall implement necessary technical and organizational measures to protect personal and other confidential information.

Whistleblowing

BDO's Suppliers are expected to have a procedure for whistleblowing that is available to employees, allowing them to speak up about possible concerns without fear of reprisals. Suppliers shall ensure that whistleblowers are protected and that reported concerns are subject to appropriate investigations, handling, and resolution.

If BDO's Suppliers become aware of violations of these guidelines, within their own organization or with subcontractors, they shall inform BDO without undue delay.

Inspections and reports

As part of following up Suppliers and subcontractors, BDO reserves the right to verify that they comply with these guidelines throughout the duration of the contract period. Such control can take place through audits or inspections carried out by BDO or third parties. Each party covers its own costs caused by such audits or inspections.

Suppliers are expected to assist by participating in follow-up meetings, audits, inspections, and by presenting relevant documentation within a reasonable time. BDO can request this documentation in the form of:

- Self-declarations from the Suppliers
- Self- or independent third-party control

Suppliers can decide to document the follow-up of these guidelines by adequate certifications of their business.

Furthermore, for the purpose of BDO conducting its own due diligence assessments as required under the Norwegian Transparency Act, the Supplier will upon request assist BDO with relevant information concerning its own activities and supply-chain.

Violations of the Supplier Code of Conduct

In the event of non-compliance or violation of the material requirements of this Supplier Code of Conduct, BDO will preferably ask the Supplier to correct the violation and document this before a set deadline. If corrective measures are not carried out or violations are of a serious character, BDO reserves the right to invoke any available contractual remedies, such as discontinue deliveries, terminate the contract, claim for compensation, etc.

BDO AS, a Norwegian limited company, forms part of the international BDO network of independent member firms. BDO AS is a member of BDO International Limited, a UK company limited by guarantee. BDO is the brand name for the BDO network and for each of the BDO member firms.

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