

## Oslo Seafood & Cargo Center AS – Code of Conduct

The basis for all activities in Oslo Seafood & Cargo Center AS is our support for legally binding regulations at national and international level as well as any obligations entered into of our own volition. All employees and organizational units in the Oslo Seafood & Cargo Center are obliged to read about rules and regulations that apply to their areas of responsibility in the company, follow these, and in case of doubt obtain further information and advice from relevant departments or authorities. An employee's supervisor should always be the first person to be contacted. These ethical guidelines apply worldwide to all employees and organizational units in the Oslo Seafood & Cargo Center. They describe binding principles for good behavior, and which must be observed by all. This will help ensure that our company succeeds over a long period of time. Violations of the ethical guidelines are not tolerated and will lead to disciplinary action. Furthermore, violations of applicable laws can lead to consequences through criminal and tort law.

### FREE AND FAIR COMPETITION

Oslo Seafood & Cargo Center respects the opportunities for free and fair competition. Our employees are obliged to comply with relevant competition law. In general, applicable laws specifically prohibit agreements or agreements between competitors on prices or terms for the purpose of sharing a market or customers as well as other practices that go beyond fair competition. Not only are actual agreements prohibited, but also agreement on specific conduct and informal discussions with anti-competitive activities in mind.

### CORRUPTION FIGHTING

Oslo Seafood & Cargo Center believes in its own products and services and how the employees carry out the work. In Oslo Seafood & Cargo Center, it is strictly forbidden to bribe business partners with money, valuables or other services of equivalent value. It is forbidden for employees to demand, receive or accept a promise of money or valuables in exchange for the purchase of products or other services.

It is strictly forbidden to give or receive gifts of any kind if this may give the impression of unauthorized influence or implicit expectation of return. This also applies to entertainment, food

and drink as well as invitations to events beyond what is usual and legal. Unauthorized gifts may also not be given or received indirectly through third parties. It is allowed to give and receive small attention and promotional items with low value. It is also permitted to give or receive meals and invitations to events with a direct connection to the business, in line with what is appropriate for the business situation and the roles of those involved. It is noted, however, that gifts and invitations to government officials, government officials or others with public office are prohibited in many countries, even if they are low-value gifts and invitations. Oslo Seafood & Cargo Center prohibits "lubrication" and in this connection follows the recommendations of the International Chamber of Commerce, ICC. "Lubrication" is small amounts that are paid to government representatives to speed up official procedures to which you are initially entitled (for example, customs clearance). Such payments are only permitted if they are absolutely unavoidable (for example in crisis situations) and only in countries where such payments are legal. These will then be exceptions that require approval from one's superior, and which must be documented.

#### CONFLICTS OF INTEREST

Oslo Seafood & Cargo Center expects that employees and members of the various organizational units do not take part in any activities or work that violate the company's interests. Secondary activities for competitors, customers, partners or suppliers, as well as ownership in such companies of more than one percent, are only permitted with the written permission of the management. Management must be informed of ownership interests (over one percent) to close family members. It is forbidden to give special treatment to certain business partners for reasons of private interests - especially family members. One should also avoid creating such an impression.

## COMPLIANCE WITH PRINCIPLES FOR NATIONAL AND INTERNATIONAL TRADE

Oslo Seafood & Cargo Center complies with all national, international and supranational trade rules. Employees must comply with these, in particular any ban on export or import, official authorization requirements and applicable customs and tax rules. Transactions offered by customers that violate these rules must be rejected. Oslo Seafood & Cargo Center may choose not to provide services or products if there is a suspicion that this may support such illegal transactions. In this context, it is particularly important to comply with the regulations aimed at preventing terrorist activities. Oslo Seafood & Cargo Center also places special emphasis on compliance with national and international laws that are intended to prevent money laundering.

## SAFE AND FAIR WORKING CONDITIONS

Oslo Seafood & Cargo Center takes responsibility for its employees and works to create and maintain an attractive working environment. Oslo Seafood & Cargo Center wants to ensure fair payment and reasonable working hours for our employees in all countries. We condemn any form of forced or child labor. Oslo Seafood & Cargo Center wants to take care of and promote the health of its employees. Therefore, it is a goal for the company to guarantee a high level of safety at all its production facilities. Oslo Seafood & Cargo Center expects all employees, especially employees with managerial responsibilities, to work to maintain a high level of safety at all times.

## PROTECTION OF THE COMPANY'S ASSETS

Oslo Seafood & Cargo Center's success as a business is based on innovative employees and the knowledge they have acquired over several decades. All employees must therefore help to ensure that Oslo Seafood & Cargo Center and business partners' operational and trade secrets do not end up outside the company. It is prohibited to disclose operational or trade secrets without permission, give them to third parties, or to exploit them for personal gain without permission. Oslo Seafood & Cargo Center expects all employees to handle the company's assets in a responsible manner and that decisions are made on the basis of risk / benefit analyzes that are made from a business perspective. This includes carefully checking the integrity of Oslo Seafood

& Cargo Center's business partners. Oslo Seafood & Cargo Center places great emphasis on the integrity of its employees. Depending on the type business, the place where the employees work and the activities they are involved in, it may sometimes be necessary to assess their financial situation and personal integrity. Everyone Oslo Seafood & Cargo Center documents - including financial reports (for external use) and accounting documents and invoices (for internal use) - must have relevant, factual and clear content. Employees are not permitted to use operational resources for personal purposes unless this is expressly permitted through the employment contract in question, in a separate agreement or via a superior. In particular, it is prohibited for employees to use Oslo Seafood & Cargo Center IT systems to display, store or send pages or messages that contain prohibited or offensive content

#### ENVIRONMENTAL PROTECTION

Oslo Seafood & Cargo Center is concerned with protecting natural resources. It is therefore natural that Oslo Seafood & Cargo Center complies with relevant environmental protection legislation.

#### WORK AGAINST DISCRIMINATION

Oslo Seafood & Cargo Center follows objective and easy-to-understand criteria in contact with employees and business partners. Oslo Seafood & Cargo Center guarantees its employees a working environment where discrimination and all types of provocations or inconveniences based on race, ethnic origin, gender, religion, outlook on life, disability, age or sexual identity are not tolerated. Oslo Seafood & Cargo Center expects employees to respect different views of life as well as cultural and national differences in their contact with other employees, including temporary staff, people in

training, applicants, former employees and business partners. In addition to this, Oslo Seafood & Cargo Center expects people with managerial responsibilities to make a special effort to promote equality between women and men at work.

## MEDIA

If we provide the public - including the media - with clear, dialogue-oriented and coherent information, this strengthens the impression of Oslo Seafood & Cargo Center globally. Official statements, especially to the media, can therefore only be made after consultation with the authorized employees.

## IMPLEMENTATION AND ORGANIZATION

All Oslo Seafood & Cargo Center employees are obliged to follow these ethical guidelines. People with leadership responsibilities play a particularly important role in this. They must act as role models, they must be available for questions about ethical guidelines, and they are responsible for ensuring that employees have sufficient information about the principles and other elements of Oslo Seafood & Cargo Center value system that apply to their areas of responsibility.

All Oslo Seafood & Cargo Center employees receive training that is specially prepared for their business areas and needs. The ethical guidelines are reviewed regularly and changed in accordance with current requirements (for example, amendments to the law). If additional guidance is prepared to supplement the principles of the Code of Ethics, these will contain detailed instructions for action and, where necessary, relevant rules for specific countries. The guidance must be considered binding. Our partners will be made aware of the ethical guidelines that apply to the Oslo Seafood & Cargo Center. We expect these too to behave fairly, with integrity and in accordance with the law. The version to be published will be made available to our partners at a later date.