



Norske tog's Code of Ethical Conduct for Suppliers

Purpose of Norske tog's Code of Ethical Conduct for Suppliers

Ethical and responsible conduct by its suppliers is of highest importance for Norske tog (NT).

The purpose of NT's Code of Ethical Conduct (CEC) for Suppliers is to ensure that all suppliers of goods and services to NT are equally aware and obligated by principles and requirements as stated in this document.

CEC applies to all of NT's suppliers and sub-suppliers (jointly referred as Supplier). The Supplier is responsible for his own and any sub-suppliers' compliance with CEC.

CEC is a part of the contract between NT and the Supplier, and violations may have consequences.

International standards and frameworks

The requirements in this CEC aligns with globally recognised standards, such as the United Nations Guiding Principles on Business and Human Rights (UNGP), the International Labour Organization's (ILO) conventions, and the Organisation for Economic Co-operation and Development's (OECD) guidelines for responsible business.

Child labour

The supplier shall respect and comply with the provisions on child labour in the UN Convention on the Rights of the Child art. 32. and ILO Convention No. 138 on the Minimum Age for Admission to Employment and work, ILO Convention No. 182 on the Worst Forms of Child Labour and No. 79 Night work of Young Persons as well as the ILO minimum wage recommendation No. 146. The Supplier shall i.e. not in violation of the conventions

- use workers of an age where school is mandatory or that are under the age of 15 years, or
- use workers under the age of 18 years for work at night or work that poses physical danger and/or health risk

Forced labour

The Supplier shall comply with ILO Convention No. 29 on Forced or Compulsory Labour or Forced Labour Convention, and No. 105 Abolition of Forced Labour Convention i.e. by ensuring that the Supplier does not contribute to, and counteracts, forced labour, slave labour and involuntary work. All of the Supplier's employees shall i.e. be at liberty to terminate their employment with a reasonable termination period.

Discrimination, Marginalised Populations, Harsh or inhumane treatment

The Supplier shall comply with ILO Convention No. 100 on Equal Remuneration Convention and ILO Convention No. 111 on Discrimination (Employment and Occupation) and the UN Convention on Discrimination Against Women) and UN Covenant on Civil and Political Rights, Art. 7 on Harsh or Inhumane Treatment, i.e. by ensuring that no arbitrary or illegal discrimination or treatment takes place based on sex, race, sexual orientation, political views, or other grounds. The Supplier shall also comply with UN Covenant on Civil and Political Rights.

Employees rights, wages and working conditions

The Supplier shall comply with ILO conventions No. 87 Freedom of Association and Protection of the Right to Organise, No. 98 on Right to Organise, No. 131 Wages, Working Hours (ILO Convention No. 1 and 14)

and No. 154 Collective Bargaining and No. 135 Workers' Representatives Convention, and ILO Convention No. 1 and 14 on working hours, as well as ILO Convention No. 95, 158, 175, 177 and 181 on regular employment.

The Supplier shall i.e.

- ensure respect of national legislation on workers rights and international labour standards
- Ensure wage levels that is necessary to afford a decent standard of living for workers and their families in accordance with the ILO's principles of estimating the living wage
- ensure that his employees or hired workers' rights are respected
- respect legislation and ILO-conventions on working conditions, working time and protection of wages and unjustified dismissals
- requirements on working hours and working environment legislation on acceptable remuneration

Health and safety

The Supplier shall comply with ILO Occupational Safety and Health Convention No. 155 and ILO Recommendation No. 164 and ensure that the working environment complies with legal requirements i.e.

- regarding information on health risk to workers
- requirements in access to safety equipment.

The Supplier shall respect employees and third parties personal data protection, the Suppliers may i.e. not register or monitor employees in violation of legislation in the relevant jurisdiction.

Environment and animal welfare

In the event that the Supplier's business is potentially harmful to the environment or animal welfare, or if required by NT, the Supplier shall have a publicly available environmental policy. Negative impact on animals or the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.

The Supplier shall continuously work to achieve the least possible environmental effects of its business, i.e. continuously endeavour to

- reduce use of energy and resources
- reduce any discharges, e.g. by participating in relevant systems for recycling and deposit, etc. of the Suppliers' goods and raw materials
- work for the development of more environmentally and animal friendly solutions.

Business ethics

The Supplier shall comply with legislation on all relevant areas, i.e. within the areas of taxes and duties and competition law.

Corruption, bribery and money laundering

The Supplier and its directors and employees shall comply with any applicable anti-corruption and anti-bribery laws, including the Norwegian Penal Code (LOV-2005-05-20-28) and any other anti-corruption or anti-bribery laws in effect where the Supplier conducts its business.

The Supplier shall actively and continuously work to eliminate extortion, corruption and money laundering. The Supplier shall i.e.

- if he has more than 30 employees, or in all events on NT's requests, present a publicly available policy against corruption and ensure that any incident where there is suspicion of corruption is properly investigated,
- implement internal regulations on gifts to employees, etc.,
- comply with general standards on ethical conduct of business, and ensure orderly and transparent conduct of its business,

- comply with requirements of legal competence, and report on any instance of possible legal incompetence, ref. clause 9.

Inspection and reports

NT shall have the right to perform all inspections at the Supplier's and its sub-suppliers' premises that are necessary to verify that CEC are complied with.

The Suppliers shall immediately report any violation of CEC that the Supplier detects in his own or his sub-suppliers' business.

The Supplier shall immediately carry out necessary actions to remedy the relevant violations.

The Supplier shall immediately report to NT in the event of a possible conflict of interest between NT and a third party with which the Supplier has a business relationship, or owns, is owned by or has a joint ownership with.

Due Diligence for responsible business in line with the OECD guidelines and compliance with the Norwegian Transparency Act

NTs Suppliers shall conduct due diligence for responsible business conduct in line with OECD Guidelines for Multinational Enterprises on Responsible Business Conduct methodology¹ and according to the Norwegian Transparency Act (LOV-2021-06-18-99) and the Corporate Sustainability Due Diligence Directive (CSDDD). If the supplier is responsible for the negative impact/damage, they are responsible for providing remedy.

Information to employees and sub-suppliers

The Supplier shall provide employees and sub-suppliers with the necessary introduction to CEC, so that all participants in any work done for NT shall have information and understanding of the CEC.

Consequences of breach

Violations of CEC shall be regarded as material breach of contract and may result in i.e.

- termination of the contract by NT,
- exclusion of the Supplier from qualification as a supplier to NT
- day penalties equivalent to 0.1% of the contract value each day. The penalties shall not exceed 10% of the total contract value.

¹ [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD iLibrary \(oecd-ilibrary.org\)](https://www.oecd-ilibrary.org/)