



Supplier Code of Conduct

Prepared by: Laila Holm

Approved by: General Manager

Revised: 16.05.2025

Introduction

Strand Shipping is committed to continuous improvement in sustainability, social responsibility, workplace environment, and business conduct. We have therefore established these ethical guidelines for our business partners.

A 'Business Partner' refers to suppliers of products and services that Strand Shipping purchases, as well as other types of contractual partners such as dealers, agents, distributors, and various types of collaborators. Each Business Partner is responsible for ensuring that its operations always comply with the applicable Guidelines.

For these Guidelines to have the intended effect, the Business Partner must be aware that the requirements described in this document apply to the entire supply chain of the Business Partner. The Business Partner shall further communicate these Guidelines (or equivalent requirements) to its subcontractors and take reasonable measures to monitor its subcontractors and ensure their compliance with these requirements.

General Guidelines

The Business Partner shall comply with the Guidelines and act in accordance with:

- The Working Environment Act
- The UN Universal Declaration of Human Rights
- The UN Convention on the Rights of the Child
- The International Labour Organization's (ILO) Core Conventions on child labour (C138, C182), forced labour (C029, C105), discrimination (C100, C111), freedom of association (C087, C098), and occupational safety and health (C155, C187)
- The OECD Guidelines for Multinational Enterprises, which provide principles and standards for responsible business conduct in areas such as human rights, labor rights, environment, anti-corruption, disclosure, and supply chain due diligence.

We conduct regular evaluations and audits of the Business Partner as part of our risk management.



Due Diligence

The Business Partner must carefully assess whether they impact human rights and working conditions, including whether they cause, contribute to, or are directly linked to such negative consequences.

The following shall apply in the event of violations of human rights or labour rights in the Business Partner's own operations or its supply chain:

- All reports of violations shall be addressed within a reasonable time and to a sufficient extent.
- All affected parties shall be followed up as needed.
- Restorative measures shall be implemented as needed. Restoration shall be proportionate to the nature and extent of any harm, and may include restitution, financial or non-financial compensation, or other measures. Measures to prevent or minimize the likelihood of recurrence shall be considered.

National Legislation

The Business Partner shall operate in full compliance with the laws, regulations, and rules applicable in the countries where they operate (Legislation). Where the Guidelines and Legislation cover the same subject matter, the highest standard shall apply.

Health and Safety

Workplace Safety

Employee exposure to potential safety risks shall be minimized through proper planning, control, maintenance, and continuous safety training.

Employees shall be provided with appropriate and well-maintained personal protective equipment where required or as indicated by prior risk assessment.

Crisis Preparedness

The Business Partner should have a system in place to ensure that the business can continue to deliver products and services at acceptable levels, even after unexpected events.

Quality and Continuous Improvement

We aim to deliver world-class quality in everything we do, and to seek continuous improvements. We expect the Business Partner to cooperate openly with us in this effort.



Sustainability

Eco-Lighthouse Certification

Strand Shipping is Eco-Lighthouse certified and is committed to working systematically on environmental improvements in accordance with the certification's requirements. We expect our business partners to also be environmentally conscious and actively work to reduce their climate footprint.

Hazardous Substances

Hazardous substances shall be identified and handled in a manner that makes them safe to handle, transport, store, use, recycle, reuse, and dispose of. The Business Partner shall have an up-to-date chemical inventory and conduct risk assessments for all hazardous substances used.

Transport

The Business Partner shall focus on the environment in the choice of transport method and in the procurement/rental of transport vehicles. We expect the Business Partner to set its own goals for reducing annual CO₂-equivalent emissions.

The Business Partner should actively consider co-shipping, timing and frequency of shipments, and minimizing transshipment.

Packaging

The Business Partner shall focus on the environment in the choice of packaging for its products, including transport packaging. Reuse and recycling of packaging should be actively considered.

Business Ethics and Integrity

The Business Partner shall maintain a high ethical standard.

Corruption

All forms of bribery and corruption are unacceptable. The Business Partner shall not offer or give undue advantage, service, reward, or incentive to a customer, agent, contractor, organization, supplier, public authority, or employee of any of these. This applies whether the advantage is offered directly or through intermediaries, and whether it is private or work-related.



Gifts and Representation

The Business Partner shall not, directly or indirectly, offer or accept gifts, representation, or expense coverage that may give, or may be perceived to give, an undue advantage in connection with a person's position, duties, or assignments, unless the gift is of a value less than USD 30.

Representation may be offered when there is a legitimate business purpose, and the costs are kept within reasonable limits. Reasonable limits mean rates for domestic representation and hospitality as specified in the State Personnel Handbook.

Competition

The Business Partner shall act honestly and fairly towards competitors. The Business Partner shall not cause or be involved in violations of Legislation regarding competition, illegal price cooperation, or market sharing.

Integrity

The Business Partner shall act ethically, responsibly, fairly, and professionally at all times. The Business Partner shall ensure that all information it produces or manages is prepared, stored, shared, and reported in an honest, balanced, and accurate manner.

Privacy

If the Business Partner handles personal data on behalf of Strand Shipping, the Business Partner shall sign a data processing agreement.

The Business Partner shall respect the rights of data subjects, and shall register, monitor, and process personal data in accordance with applicable legislation and Strand Shipping's privacy principles.

If the Business Partner operates directly or indirectly outside the EU/EEA, the Data Protection Officer at Strand Shipping shall be informed through a privacy mapping of the system/application and necessary legal assessments shall be carried out.

Money Laundering

The Business Partner shall distance itself from all forms of money laundering and shall take measures to prevent financial transactions from being used by others to launder money.

Tax and Undeclared Work

The Business Partner shall report and pay its public taxes and duties in accordance with Legislation and shall distance itself from undeclared work and labour crime.



Conflict Minerals

The Business Partner shall follow the applicable guidelines and recommendations from the Responsible Minerals Initiative (RMI) to ensure responsible sourcing of conflict minerals.

Conflict minerals include tin, tantalum, tungsten, gold (including derivatives), and cobalt extracted in the Democratic Republic of Congo (DRC) or adjoining countries.

Animal Welfare

The Business Partner shall consider animal welfare in its own operations and in its supply chain, including following the Animal Welfare Act and the Terrestrial Animal Health Code; Section 7 - Animal Welfare.

Boycott Provisions

The Business Partner shall take necessary precautions to ensure that neither they nor their suppliers are involved in business with parties that may have sanctions, be blacklisted, or operate in blacklisted countries.

Conflict of Interest

The Business Partner shall seek to avoid potential conflicts of interest. If such a conflict should nevertheless arise, it shall be immediately reported to Strand Shipping.

Management System

The Business Partner shall have a management system. The management system shall be designed to ensure compliance with Legislation and the Guidelines.

Responsibility

The Business Partner shall appoint a person in a senior position who is responsible for ensuring compliance with the Guidelines.

Communication of the Guidelines

The Business Partner shall communicate the Guidelines to all employees and its supply chain and take measures to ensure compliance with the Guidelines.



Control

Strand Shipping or others with authorization may conduct audits at the Business Partner and any subcontractors or contract assistants. All relevant documentation necessary to verify compliance with the Guidelines may be required to be presented, and unrestricted access shall be granted to all parts of the premises where work under the contract is performed.

Documentation

We expect the Business Partner to prepare documentation that the Guidelines are being followed.

Reporting, Questions, and Concerns

The Business Partner shall have a system for reporting critical issues, including violations of the Guidelines, and shall promptly inform Strand Shipping in writing of any reports related to business with us. We expect full cooperation regarding the investigation of such matters.

The Business Partner shall not retaliate against any whistleblower, or anyone assisting the whistleblower and shall implement procedures to ensure confidentiality and protection of the whistleblower.

Reports directly to Strand Shipping can be sent to: report@strand-shipping.no

Consequences of Violations

In the event of serious or repeated violations of the Guidelines, Strand Shipping shall have the right to terminate the existing contract with the Business Partner and/or end the business relationship or other forms of cooperation. Strand Shipping may, however, choose to continue the cooperation with the Business Partner with the aim of making improvements, including implementing any necessary restorative measures.