

Code of Conduct

Introduction

Røros Produkter's code of conduct and ethical guidelines are compiled for creating common approaches on how the organization should be run. This is to make sure all owners, suppliers, customers, employees, public authorities, cooperative and competing companies at all times have confidence in the company's professionalism and integrity.

Our code of conduct is based on the internationally recognized UN and ILO conventions and recommendations.

Range, responsibility, consequences

The guidelines apply to all employees, apprentices, temporary staff, consultants and board members representing Røros Produkter AS. Everyone is committed to familiarizing themselves with the guidelines. Violation of the code of conduct may lead to termination of employment and possibly charges. If you are in any doubt as to whether the situations you are facing are violating the guidelines, you must consult your immediate superior. It would be a violation of the code of conduct to harass someone for having addressed such issues.

Internal relations

We want to create an engaging, healthy and emerging work environment where all employees should treat each other with respect, trust and with a positive attitude. This means, among other things, that we should respect each other's functions, competence, time and personality. Røros Produkter AS will be responsible for equal work opportunities and equal and fair treatment of all employees. Everyone shall be loyal to the purpose and goals of the business. It's expected that each person shall follow up and implement decisions that are made and comply with orders from the superior. Only unbiased criteria should be used for person-related decisions, such as hiring, training, payment and

advancement. It is assumed that all employees familiarize themselves with the current working regulations. (Stamina)

All employees are fully entitled to join trade unions and negotiate collectively. Children under the age of 18 shall not carry out work that endangers health and safety. It is not acceptable with discrimination based on ethnicity, religion, gender, sexual orientation, union membership or political affiliation. HSE work in the company is systematically run internally in the company and in cooperation with Bedriftshelsetjenesten AS (Corporate Health Services) for external professional guidance.

General business ethics, visions and values

Our company will manage and execute business in a fair and ethical manner.

Impartiality

Both the board and employees should avoid coming into situations that may lead to conflicts between the company's and personal interests. If personal interests can affect a decision, then it should be addressed with the superior. In cases processing on the board, one must resign from the actual case if there's a conflict of interest.

Directorships

Board positions or ownership in commercial companies shall in each case be settled with the general manager. One should avoid memberships that can lead to conflicts of loyalty.

Anti-corruption

The company shall work against all forms of corruption, including extortion and bribery.

Human rights

Our company should support and respect the protection of internationally recognized human rights and ensure that it does not contribute to violations of these. The company should not cooperate with suppliers where there is doubt about forced labor or child labor.

Gifts

Employees of the company should not seek to obtain gifts, benefits or other benefits that are inappropriate or which may harm the interests or reputation of the business. The company should also not offer gifts, benefits or other benefits that can be perceived as inappropriate for the recipient or which in other ways can doubt the integrity.

There are separate rules for gifts related to the employees own various celebrations.

Representation

Moderate forms of hospitality and representation are part of the corporate policy, but the degree of attention must not be developed so as to damage the company's competitiveness and integrity. Travel expenses and stays at business trips are covered by the company and, if necessary, by the trade union.

It is assumed that the company's employees act in accordance with the ethical guidelines for business travel, courses and other events.

Confidentiality

Any confidential information given or received when working at Røros Produkter AS must not be passed on, if the intention is of personal gain, damage to business, employees or leakage of trade secrets. It is expected that all employees contribute to building a positive reputation of their own workplace through loyal and trust-creating

attitude outwards. Special care is required in the presence of the press, official meetings and gatherings. This obligation also applies after the employment has ceased.

The duty of confidentiality shall not prevent employees from informing superiors about matters that are believed to be in violation of applicable laws and regulations.

Health Safety and Environment

Our company has established a Web-based HSE system (Stamina) that is set up according to the current legislation. The system is available to all employees. Our goal is a business without harm to people, the outside and the inner environment. Risk-reducing measures shall be systematically worked on.

The company has also been certified as a “Miljøfyrtårn”, which means that strict environmental requirements are also imposed on us as a company.

Personal data / Protection of Information

All sensitive information about employees, customers, and suppliers should be protected by correct storing in writing or electronically in accordance with the GDPR Regulation.

General conditions

Røros Produkter As its employees must be service-oriented, proactive, honest and accommodating in relation to each other and external actors.

Approved at Board meeting on 15 March 2019.