Metrostav Norge AS

Code of conduct

Metrostav Norge AS "MTS Norge"

General Principles

commits to respecting the laws in effect and any other applicable provisions in the countries where it is active and to fulfilling their obligations reliably.

must demonstrate honesty and fairness in all aspects of their business activities and it commits to fulfil its social responsibility with respect to all of its business activities.

Conflict of Interests and Corruption

In dealing with business partners and state institutions or other partners, the interests of the company and the private interests of employees on both sides are to be kept strictly separate. Actions and decisions are to proceed independent of considerations which do not concern the business at hand and which involve personal interests.

Current anti-corruption criminal law is to be upheld. Among other things, the following is to be observed: Criminal Acts in Dealings with Public Officials.

The granting of personal advantages (in particular benefits in kind such as payments and loans, including the giving of smaller gifts over a longer period of time) by the MTS Norge and their employees to public officials (such as civil servants or public employees) or to the other business partners or oneself or to third parties, is not permitted.

Criminal Acts in Business Dealings

Personal benefits in kind of exchange for a favoured position in business dealings may not be offered, promised, granted or approved. Nor may personal benefits be demanded in dealings with business of MTS Norge. MTS Norge must require from its employees that they will not allow any such benefits to be promised to them.

No employee should accept anything of value – especially in the form of a personal gift* or a benefit arising from a MTS Norge business relationship** – that could reasonably be assumed to have a potential impact on business decisions or transactions. Neither the management nor an employee of the MTS Norge is allowed to accept such kind of value from an employee of business partners or similar. Invitations must be within the bounds of normal business hospitality.

* Small gifts up to a value of 50 euros are excepted from this ruling; but in this connection any relevant national tax stipulations must be observed. Gifts in the form of money must never be accepted.

** For example, persons or companies with business links to MTS Norge must not be awarded private contracts which could unduly profit the employee and/or harm the interests of MTS Norge. The relevant Compliance officer must always be consulted beforehand if any such case arises.

Anti-trust Law

MTS Norge respects fair competition. Thus the MTS Norge adheres to existing laws that uphold and promote competition, in particular prevailing anti-trust laws as well as laws that regulate competition. In dealing with competitors, these provisions in particular prohibit collusion and other activities aimed at influencing prices or conditions, dividing up sales territories or customers or using prohibitive means to inhibit free and open competition. Furthermore, these provisions prohibit agreements by which customers are to be enjoined in their freedom to autonomously determine their pricing and miscellaneous conditions when reselling.

Forced Labor

The MTS Norge rejects every form of forced labor. No employee may be obliged to work by the direct or indirect use of force and/or intimidation. Only people who voluntarily make themselves available for work may be employed.

Child Labor

MTS Norge respects the regulations of the United Nations on human rights and in particular on children's rights. The minimum age for employment must not be below the age at which compulsory schooling ends, and in no case may it be below the age of 15. In particular, the MTS Norge commits to complying with the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labor (Convention No 182 of the International Labor Organization), too. If a national regulation concerning child labor provides for stricter measures, these shall have precedence.

Human Rights

MTS Norge respects and supports compliance of internationally recognized human rights. All its employees are under an obligation to ensure that these universally recognized fundamental rights are observed.

Discrimination

MTS Norge commits, within the scope of prevailing laws and statutes, to opposing all forms of discrimination. It is called on to create an atmosphere of respectful mutual relations and to rigorously oppose any discrimination on the grounds of race, ethnic origin, gender, religion or beliefs, disability, age or sexual identity.

Health Protection

MTS Norge guarantees protection of workers in the workplace and workplace health protection within the scope of national provisions. MTS Norge shall take all possible precaution to avoid accidents and train all employees in health and safety.

Fair Working Conditions

MTS Norge respects its employees' right of association within the bounds of prevailing laws and statutes. It commits to respect the personal dignity, privacy and the right of every individual and not to tolerate unacceptable treatment of employees, such as physical punishment, sexual or personal harassment and discrimination. MTS Norge will ensure fair payment and the payment of any national legal stipulation on minimum wages to its employees. It will furthermore ensure that the maximum working hours laid down in the respective country are adhered.

Environmental Protection

MTS Norge is committed to sustainably upholding the goal of environmental protection. Laws and international standards passed for the protection of the environment are to be obeyed. It supports to minimize adverse impact on the environment and to constantly improve environmental protection. MTS Norge is to support environmentally-minded actions on the part of its employees.

Company Secrets

MTS Norge commits its employees to safeguarding trade and company secrets. It is forbidden to divulge confidential information, as well as confidential documents, to third parties without proper authorization or to provide other forms of access to them, unless proper authorization has been granted or it has to do with publicly available information.

Relation to business partners

MTS Norge is called upon to communicate the basic principles of this Code of Conduct to its immediate contractual partners, to promote the compliance of its content to the best of its ability among its contractual partners and to require them to also adhere to the Code of Conduct. MTS Norge is further called upon to recommend to its contractual partners to in turn call upon their contractual partners to follow the Code of Conduct.

Compliance

MTS Norge is at liberty to introduce further codes of conduct with higher requirements of ethical practice for itself and its employees. It commits to inform its employees of the provisions governed by the Code of Conduct and the obligations that result from it. MTS Norge reserves the right to audit adherence to this Code of Conduct at any time and without prior notification or to have adherence audited by independent third parties. The audit will take place in accordance with the respective applicable law. If any violations of the applicable law or of this Code of Conduct is established, MTS Norge has to be informed immediately. In the event of any violation of the applicable law or this Code of Conduct MTS Norge reserves the right to terminate the contractual relationship.

Attachment No. 1 - General information on MTS Norge Compliance plan

Attachment No. 1

General information on MTS Norge Compliance plan:

Metrostav Norge compliance overview

Structure of compliance documentation:

1) Code of conduct – Metrostav Norge AS (effective)

2) Code of Ethics and Ethical Line of Metrostav group (effective)

3) Our Management and Work Method – Metrostav Group (effective)

Metrostav Norge AS

4) Other applicable documentation – Metrostav Group (effective)

Company's compliance plan

Establish and adopt written policies, procedures, and standards of conduct. Having clear written policies and procedures in place that describe compliance expectations fosters uniformity within the company.

Create program oversight. Determine who will oversee, monitor, and enforce the compliance program and serve as the company "watchdog" with questions and concerns.

Provide staff training and education. Employees at every level need to understand compliance program expectations and standards to be able to comply with them. Implement a training program that clearly communicates company's program requirements, with an annual refresher course that reminds employees of the code of conduct and incorporates any changes.

Establish two-way communication at all levels. Set forth the expectation that employees should proactively communicate in a timely manner, whether that means asking compliance questions, reporting issues, or addressing ethical concerns. Include a way for employees to anonymously report compliance issues or fraudulent or illegal behaviour without fear of retaliation.

Implement a monitoring and auditing system. You'll need to measure the effectiveness of your corporate compliance program and identify risks. To accomplish this, develop a system of both internal and external monitoring, including formal audits.

Enforce consistent discipline. Develop a plan to enforce standards of conduct in a timely manner, outlining appropriate disciplinary measures for employees who fail to comply with program requirements.

Take corrective action. When you identify vulnerabilities or violations through monitoring and auditing, take timely, consistent action to correct the issue.

Date: 30.6.2021

.....

Aleš Gothard
CEO
Metrostav Norge

Aleš Richter
CFO
Metrostav Norge