

Commitment and accountability • Code of conduct

Code of conduct

1. Scope

The Code of conduct sets out our expectations, commitments, and requirements for ethical conduct. This Code applies to Allton's board members, employees and hired contractors.

- The Code of conduct must be read in conjunction with Allton's policies, manuals, and procedures.
- An extract of this Code is reflected in the supplier declaration form.

2. Ethical principles and core values

In Allton we believe in the following core values:

- Respect for others
- Honesty
- Integrity
- Accountability

Allton's personnel shall comply with all applicable laws and regulations in all jurisdictions where we do business. Violation of domestic or foreign laws and regulations may subject individuals, as well as the company, to civil and/or criminal penalties.

We shall also ensure that the following international guidelines are followed:

1. United Nations [UN Principles of Global Compact](#)
2. ICC (International Chamber of Commerce) [Rules on Combatting Corruption](#).
3. International Labour Organisation [ILO International Labour Standards](#).
4. The [Voluntary Principles on Security and Human Rights](#)

No employee should be misguided by loyalty to Allton or desire for the company's profitability to disobey any applicable law or this Code of conduct.

3. Decision making and the Code of conduct

When taking a decision, ask yourself the following:

- Is it legal?
- Does it comply with this Code?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?

If you are unsure about any of the answers, ask.

4. Reporting/speaking up

We encourage all employees to ask questions and raise issues without fear of retaliation and are committed to treat reports seriously and investigate them thoroughly.

Suspected unethical, illegal, or suspicious behaviour must be reported immediately. To report a concern:

- Talk to your manager.
- Contact executive management.
- Contact a member of the Board of Directors

This is further described in our *Whistleblower procedure* (see reference document).

5. No retaliation

In Allton we will not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

Our policy is no retaliation for reporting concerns of any kind.

6. Equal opportunity and freedom of association

We will not tolerate discrimination based on race, colour, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class.

We recognise and respect the freedom of association and the right to collective bargaining. Allton will work against all forms of forced and compulsory labour and shall not accept any contractor that is not in compliance with these standards.

7. Child labour

Allton will not accept child labour or any contractor or supplier using children outside the minimum age recommended in the ILO conventions. The following minimum age limits are accepted:

Light work 13 years, regular work 14 years and for hazardous work, 18 years.

In countries where economic and educational facilities are less well-developed the minimum age is 14 years and 12 years for light work. The minimum age for hazardous work is still 18 years.

8. Harassment

In Allton we have zero tolerance for any form of harassment, including sexual harassment and bullying.

We shall treat all fellow employees, customers, business partners and other stakeholders with dignity and respect. Any behaviour that can be perceived as degrading or threatening is prohibited and can result in disciplinary action up to, and including, termination.

9. Conflicts of interest and loyalty

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the company's best interests. Employees should avoid the types of situations that can give rise to conflicts of interest. Allton requires all employees to be loyal, and to refrain from actions or to have interests that make it difficult to perform their work objectively and effectively.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources department.

Employees owe a duty to advance the legitimate interests of the company when the opportunities to do so arise. Employees may not take for themselves personal opportunities that are discovered using corporate property, information or position.

No Employee should be misguided by loyalty to Allton or desire for the company's profitability to disobey any applicable law or the company's Code of conduct.

10. External Communication on behalf of the company

Only the CEO is authorized to represent the company to media and/or legal authorities. Employees should refer all requests for information or interviews to the CEO.

The CEO may authorize employees to talk on behalf of the company in specific cases.

11. Confidentiality

It is important that each employee protect the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed.

Confidential information can include, but is not limited to:

- Customer lists.
- Supplier lists.
- Pricing information.
- Terms of contracts.
- Company policies and procedures.
- Financial statements.
- Marketing plans and strategies.
- Trade secrets.
- Any other information that could damage the company or its customers or suppliers if it was disclosed.

12. Privacy

The Company's processing of personal data shall be subject to the care and awareness which is required according to laws and regulations. Processing of personal data must be limited to what is needed for operational purposes, efficient customer care, relevant commercial activities and proper administration of human resources.

When providing personal information, employees shall limit access to only those with a clear business need for the information.

Employees are required to report any breaches of privacy, including the loss, theft of or unauthorized access to personal information, to their manager. For further guidance, see the *GDPR procedure* (see reference document).

13. Relations with customers, suppliers, competitors and public authorities

While we compete aggressively for new business, relationships with business partners and authorities are built upon trust and mutual benefits.

- Customers shall be met with insight, respect and understanding.
- Suppliers shall be treated impartially and justly.
- Public authorities shall be met in an appropriate and open manner.

The Company desires fair and open competition in all markets. Under no circumstances shall the Company or any of its employees be part of actions that breach applicable competition legislation.

Any Employee should confer with his or her immediate superior, the executive management or the Board if he or she has a question with respect to the possible anti-competitive effect of transactions or becomes aware of any possible violation of applicable competition legislation.

14. Bribery and facilitation payments

Allton will not attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or kickback. This applies to governmental officials and in private business.

The company does not permit facilitation payments to government officials or private business to secure or speed up routine actions.

Employees are to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies
- Always keep accurate books and records and monitor that funds are not being used for bribery or facilitation payments
- Refuse any offer or request for an unlawful payment and report the incident to the company's executive management.
- Gifts and entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. The company is committed to winning business only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are to:

- Use sound judgment and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships.
- Never accept gifts or entertainment that are illegal, immoral or could reflect negatively on the company.
- Never accept cash, cash equivalents, stocks, or other securities.

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

If in doubt, check with your manager before giving or receiving anything of value.

16. Money laundering

Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- Attempted payments in cash or from an unusual financing source.
- Arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer.
- Unusually complex deals that don't reflect a real business purpose.
- Attempts to evade record-keeping or reporting requirements.

17. Insider Trading

Employees may learn information about the company, associates, clients, business partners or other companies that is not publicly available.

Employees are prohibited from:

- Buying or selling securities based on non-publicly available knowledge gained during business.
- Providing information or encourage another person to buy or sell securities based on inside information.

Employees are required to immediately report suspected insider trading to the executive management.

18. Political contributions

Allton does not make political contributions.

Employees are free to support any political party or entity on a personal level. However, this must be kept separate from company business.

19. Integrity of records

All books, records, accounts and financial statements must be prepared with care and accurately reflect our transactions. All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records.

Employees are required to:

- Maintain these records and protect their integrity for as long as required.

- Maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes.

Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

20. Protection and proper use of company assets

Company personnel shall have a personal responsibility to protect the assets of the Company from misuse or misappropriation.

The Company's assets include:

- Tangible assets, such as facilities and their equipment, vessels, and their apparatus.
- Intangible assets, such as proprietary intellectual property, trade secrets and business information.

21. Corporate Social Responsibility

The company understands that corporate social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our company and its suppliers.

One goal of the corporate social responsibility procurement program is to build partnerships with like-minded organizations by actively seeking out business partners who are the most environmentally and workforce friendly.

Responsible Environmental Impact: The company and its suppliers shall produce measurable environmental impact reports and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

The company encourages and supports involvement in the community. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in the company's public spaces.


Nils Haugestad
CEO

References

Type	Title	Number
IMS	Whistleblower	PP-GP-0003
IMS	GDPR	PP-GP-0005