

Guidelines for safeguarding human rights and decent working conditions

Valid from 19.05.2022

Approved by the Board of Directors of SpareBank 1 Forsikring AS 19.05.2022

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Revision history:

Version	Date	Comments	Approved by
1.0		Approved	The Board of
			Directors of
			SpareBank 1
			Forsikring AS

1 Purpose

Social responsibility is an integral part of SpareBank 1 Forsikring's business strategy and values. The company emphasises long-term value creation and positively contributing to society. Therefore, the company wants to work with partners that share these values. The minimum requirement for cooperation is that partners comply with SpareBank 1 Forsikring's principles for decent working conditions. Decent working conditions means work that safeguards fundamental human rights and health, safety and the environment in the workplace, and that provides a living wage.

2 Scope

The guidelines apply to suppliers and business partners of SpareBank 1 Forsikring and SpareBank 1 Forsikring's units in which the company has a determining influence. Suppliers include enterprises that provide products and services that SpareBank 1 Forsikring purchases in order to conduct its operations, but can also include other categories such as agents, distributors and various business partners involved in the company's supply chain¹. A business partner means anyone that supplies goods or services directly to SpareBank 1 Forsikring and SpareBank 1 Forsikring's units in which the company has a determining influence but is not part of the supply chain.

Every supplier is responsible for ensuring that their operations and supply chain comply with the applicable guidelines at all times. Supplier's must ensure that these guidelines also apply to their subcontractors and carry out measures to check compliance with the requirements of the guidelines. If necessary, SpareBank 1 Forsikring can require a supplier to obtain confirmations from subcontractors that they are complying with the requirements. Suppliers that sell products and services to SpareBank 1 Forsikring must be able to inform SpareBank 1 Forsikring where products or services are produced upon request.

3 Principles and requirements

The principles for safeguarding human rights and decent working conditions are based on national and international guidelines and conventions, including the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, and the ILO's conventions on child labour, forced labour, discrimination and freedom of association. Suppliers and business partners must also comply with applicable laws and regulations in countries where they have business activities and are registered. If no local legal requirements equivalent to those addressed in these guidelines exist, or if they are less restrictive, suppliers and business partners must nevertheless comply with the requirements of the guidelines at all times, provided that this does not conflict with laws or regulations. If it does, SpareBank 1 Forsikring must be informed and the situation must be explained.

Areas of responsibility and requirements for business partners:

3.1 Human rights and working conditions

Suppliers and business partners must conduct their business activities in ways that safeguard human rights and decent working conditions. Suppliers and business partners must therefore have written policies, guidelines, personnel instructions or similar describing and confirming the company's standpoints. At a minimum, these must cover the following:

¹ Pursuant to section 3(d) of the Transparency Act, the supply chain means any party in the chain of suppliers and subcontractors that supplies or produces goods, services or other input factors included in an company's delivery of services.

- · Prohibition against child labour
- Freely chosen employment
- · Right to organise
- Prohibition against discrimination and harassment
- Working hours that do not exceed the limits in local legislation
- Fair pay

3.2 Health and safety

Suppliers and business partners must facilitate a safe working environment in accordance with local laws and regulations. This means that suppliers and business partners must have an action plan containing measures designed to reduce the risks faced by employees in the enterprise. Employees must receive training on health, safety and the environment tailored to the risks to which they may be exposed when performing their duties. Suppliers and business partners must be able to confirm and document that such training has been provided. Injuries in the workplace must be documented and followed up, and preventive measures must be implemented.

4 Compliance

4.1 Implementation

Suppliers and business partners are expected to assign responsibility for ensuring compliance with the requirements covered in these guidelines to management level personnel. These responsibilities include implementation and follow-up in the enterprise's organisation, for example through training, implementation in management systems, and follow-up and evaluations tailored to the business partner's size, context and impact.

4.2 Reporting

Suppliers and business partners must comply with statutory requirements for the disclosure of information on how social considerations are addressed, for example on their website. Suppliers and business partners must disclose information about specific topics related to the requirements of the guidelines upon request.

4.3 Breaches of the guidelines

Suppliers and business partners must, without undue delay, report detected or suspected breaches of the guidelines. These must be reported to the contact person in SpareBank 1 Forsikring with responsibility for following up suppliers and business partners.

4.4 Monitoring and control

SpareBank 1 Forsikring reserves the right to verify the compliance of suppliers and business partner with these guidelines for the entire term of a contract. This includes the right to demand documentation, or conduct both pre-notified and unannounced on-site audits, to verify compliance with the requirements described in the guidelines, both at the supplier and at any subcontractors linked to the delivery to SpareBank 1 Forsikring, and at the business partner.

In those cases where it is discovered that the supplier or business partner is not complying with one or more of the requirements described in the guidelines, SpareBank 1 Forsikring will require the situation to be rectified and the progress of such rectification to be reported.