



FRØY

Code of Conduct

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Code of Conduct

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Executive party: All employees

ETICAL GUIDELINES

General

Frøy ASA including underlying companies is conscious of its social responsibility.

Frøy ASA and its subcontractors must comply with the national laws and regulations in the areas in which they operate, as well as follow the company's own internal routines and requirements.

Frøy ASA's goal is to contribute to influencing the work for human rights, labour rights and environmental protection by having guidelines internally, against suppliers and subcontractors for social responsibility.

Health, safety and the environment

Workers must have a safe and healthy working environment. The company will work effectively to continuously improve HSE work and to prevent and reduce occupational accidents and health injuries.

HSE training must be documented regularly, and work procedures shall be prepared for work operations that are considered a risk to HSE.

New employees shall have an introduction to the company's management system and current routines.

Suppliers and subcontractors are responsible for their workers' HSE and that they have adequate protection and protective equipment in relation to the work carried out.

All employees are entitled to access to clean sanitary facilities, water and places where there is a possibility of a food break.

Environmental impact

Production shall not conflict with national or international legislation with regard to the environment. Relevant permits must be obtained where necessary.

There shall be no environmental crime or predatory operation on resources in the local community.

Chemicals and other harmful substances should be managed in a prudent manner.

It should be encouraged to implement active environmental engagement that helps prevent direct pollution on the part of the company.

Frøy ASA shall not directly or indirectly contribute to the destruction of the income base for marginalised population groups.

Working conditions

Employment contracts

Obligations to the workers, in accordance with international and/or national laws and rules on regular employment shall not be circumvented through the use of short-term engagements, subcontractors or other working relationships.

Everyone is entitled to an employment contract in a language they understand.

Wages

Wages must at least be in line with national minimum wage regulations or industry standards, and always sufficient to meet basic needs.

Salary ratios and payment of salary must be agreed in writing before work commences.

The agreement shall be understandable to the employee.

Deduction of salary as disciplinary action is not allowed.

Overtime is paid in accordance with national legislation or in accordance with industry standards.

Working hours

Working hours shall be in accordance with national laws and industry standards, and not exceed working hours in accordance with applicable international conventions.

Overtime work must be voluntary but can be imposed on workers for shorter periods to meet market demand. Current regulations for overtime shall be followed and the maximum number of overtime hours shall not be exceeded.

Trade union organization and collective bargaining

All workers have the right to join or establish trade unions of their choice, and to negotiate collectively.

The employer shall not discriminate against union representatives or prevent them from performing their union work. If these rights are limited by law, the employer shall facilitate, and in no case prevent, parallel mechanisms for free and independent organization and negotiation.

Forced labor

There shall be no form of slave labor, forced labor or involuntary work.

The employee shall be free to terminate the employment relationship with a reasonable period of notice.

The employer shall not withhold identity papers or require a deposit.

Children and young people at work

Children under the age of 18 should not carry out work that puts health or safety at risk, including night work. Night work should only be carried out by children under the age of 18 if it is part of their training, and they shall then have a minimum of 9 hours of continuous leisure time between 20:00 and 08:00 o'clock.

Children under the age of 18 must be individually assessed as to whether they are fit to carry out the work they are set to carry out.

Children under the age of 15 must not be prevented from schooling and should only work outside of school hours. They should not exceed 8 hours of working day. There shall be written consent from parents or guardians.

Apprentices follow their own training program and must be clearly defined in terms of duration and content.

Discrimination

There shall be no discrimination in working life on the basis of gender, ethnic affiliation, religion, disability, age, marital status, sexual orientation, trade union membership or political affiliation.

Protection shall be established against conduct that is threatening, intrusive, abusive or exploitative and against discrimination or dismissal on an unacceptable basis.

Abuse

All employees should be treated with respect and dignity. The use of physical or psychological abuse or threat of this shall not be tolerated. The same applies to sexual or other abuse, and various forms of humiliation.

Animal ethics considerations

Frøy ASA wants to be a leader in handling and transporting fish in a humane way.

Norwegian law must be followed when it comes to animal welfare and animal ethics considerations.

All incidents in connection with animal welfare are recorded in the nonconformity system and dealt with internally. In the event of incidents that require it, it is reported to the Norwegian Food Safety Authority.

Social media

Social media can be described as digital and user-controlled communication platforms where users share information. Written or uploaded information that can be shared/saved by others. It is therefore important to be reluctant to publish anything from the workplace.

Using social media should not interfere with any employees work or affect the quality of it.

Internal information, text, images or videos from own and customers' vessels and production facilities shall not be published unless the operations manager/general manager has approved it.

Employees are to comply with the following guidelines:

- Be careful with comments and posts that can be related to employers/customers or colleagues.
- Employees should not speak out on behalf of the employer; personal views are to be published as personal.
- Show respect for your workplace, colleagues, partners, customers and others.
- In the event of accidents or other emergencies, all communication must go through management. This is to avoid incorrect information and protect people involved.
- Don't engage in discussions where your expressed opinions and arguments can be interpreted as the company's.
- If an employee discovers anything on social media that concerns his or hers workplace, please contact the management.

Duty of confidentiality and information processing

Suppliers and subcontractors have a duty of confidentiality regarding information of a sensitive, confidential or confidential nature concerning Frøy ASA's activities.

Sensitive and confidential information shall be protected, and data kept securely.

No individual shall use, or contribute to any other user, information about Frøy ASA or other companies of a sensitive, confidential or confidential nature, in order to subscribe for or trade in securities, be it on a private basis or on behalf of the employer.

Nonconformity management and complaint rights

There shall be a system that handles nonconformities and contributes to preventive measures for new undesirable incidents. In the event of undesirable incidents, measures shall be taken to rectify the conditions.

All employees shall have the opportunity to anonymously complain about misconduct in the company