



ICOPALTAK

SUPPLIER CODE OF CONDUCT

1. General Commitments

IcopalTak, part of BMI group, employs a modern approach to industrialism. We take a long-term view to building businesses, with the recognition that sustainability and success are integrally intertwined.

We embrace innovation, developing groundbreaking products and solutions that help customers thrive in a rapidly-changing world. We commit to empowering our employees and to enriching the communities in which we work and live. We factor environmental impacts into our business decisions, seeking to act as positive contributors to our industry and the planet.

We invest in products, people and the planet in order to generate more sustainable growth and to continue building a better, more resilient future.

> **Innovating Products**

We are uniquely positioned to provide innovative solutions that directly improve people's daily lives and impact the world. Our products address the challenges of the built environment—from housing to transportation to renewable energy generation—helping to build a better world, now and into the future.

> **Supporting Our People and Communities**

Our employees are our greatest asset. We support our employees by ensuring safe work environments and investing thoughtfully in professional growth and development. To foster diversity of thought, we cultivate an inclusive, creative culture—encouraging debate, celebrating new ideas and continuously learning from each other. We also build a better future for our neighbors. From jobs training to disaster relief, our companies play an integral role in their communities, working hand-in-hand with area citizens and nonprofit partners to build resilient and sustainable communities for the long term.

> **Helping Build a Healthier Planet**

We embrace the responsibility to be stewards of our planet, and we invest strategically in the technological advances and operational best practices that will improve the lives of our customers, the wellbeing of their communities, and our impact on the environment.

We are committed to progress—advancing innovations that drive our businesses, protect our customers, and improve the built environment. We invest our resources to continuously improve the products we deliver to our customers, the lives of the people who depend on us and the planet on which we live. Our leadership is aligned on this vision and accountable for our success in achieving our goals.

As part of these commitments, the principles of sustainable development – value creation, sustainable environmental performance and corporate social responsibility – are essential to our corporate strategy. Our approach to Environmental, Sustainability and Governance (“**ESG**”) topics includes how we work with our Suppliers. Our goal is to partner with Suppliers to demonstrate responsible supply chain management to our customers/consumers.

We require all suppliers who work with or for IcopalTak to respect and comply with this Supplier Code of Conduct.



IcopalTak ensures that these principles are enforced through due diligence assessments in accordance with the Norwegian Transparency Act (“**NTA**”).

2. **General expectations on our Suppliers**

We expect our Suppliers to:

- a) comply with all applicable laws and adhere to this Supplier Code of Conduct, and the relevant ESG Standards, as further detailed in below.
- b) conduct business ethically and with integrity, protect human rights in compliance with the ethical trading initiative, provide for the safety and well-being of their employees, and operate in an environmentally responsible manner committed to sourcing any product or service ethically.
- c) keep any information received from IcopalTak confidential.
- d) conduct business in accordance with the NTA, hereby performing due diligence when conducting business so that business is at all times conducted in accordance with OECD Guidelines for multinational companies and UN Guiding Principles on Business and Human Rights (“**International Guidelines**”).
- e) contractual ensure compliance with or implementation of the obligations of this Supplier Code of Conduct across your business and supply chain; and
- f) be responsible for getting acquainted with their obligations under the NTA, when applicable, in proportion to their size, business activity and risk of breach of International Guidelines.

3. **ESG Standards**

IcopalTak is committed to meeting high social, environmental, and Health & Safety standards, and we expect our Suppliers to:

3.1 Health & Safety and Environment

- a) Comply with all applicable health, safety, and environmental laws and regulations.
- b) Prioritize and protect the health and safety of individuals (employees, contractors, local communities), physical assets, and work environments.
- c) Use their expertise, resources, and influence to make a positive impact on people, communities, industry, and our planet by continuously improving their operations and evolving their product offerings by seeking to reduce their environmental impact, use resources efficiently, reduce water use and greenhouse gas emissions, and encourage the use of energy-efficient technologies in their production and services; and
- d) Promote safe and environmentally sound development, manufacturing, transport, use, and disposal of products and ensure that product quality, specifications, and safety comply with applicable standards and requirements.

3.2 Social Integrity and Fairness

- a) Comply with all applicable labor and employment laws;
- b) Foster a work environment where all employees are treated fairly, with integrity and respect;
- c) Provide all employees with a safe, discrimination-free, and harassment-free environment;
- d) Provide equal employment and advancement of opportunity to all individuals.
- e) Prohibit discrimination based on race, color, religion, sex, age, national origin, gender, or any other category protected by law;
- f) Prohibit the use of forced, indentured, or involuntary labor (including modern slavery and human trafficking) and child labor;



- g) Recognize and adopt an open attitude towards the freedom of association and the right to collective bargaining and ensure that workers' representatives are not retaliated against, facilitating the fulfillment of their representative duties in the workplace in accordance with applicable laws; and
- h) Empower employees and other stakeholders, without retaliation, to anonymously report concerns or potential unlawful practices or policy violations.

3.3 Compliance & Governance

- a) Comply with any applicable national and international laws and regulations, including all labor laws, competition laws, data protection laws, anti-boycott laws, and export and sanction controls, and conduct business in a fair and ethical manner;
- b) Prohibit all types of bribery, corruption, and money laundering and comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and all other applicable international anti-corruption and sanctions laws;
- c) Implement appropriate systems and controls to facilitate compliance with applicable laws, regulations, and standards;
- d) Apply principles of true and fair accounting and keep accurate books and records;
- e) Avoid any situation or actions that may appear to create a conflict of interest;
- f) Respect the privacy and confidential information of all employees and persons they do business with while also protecting confidential data and intellectual property against misuse, theft, fraud, or improper disclosure; and
- g) Respect and protect IcopalTak's physical or virtual property, including tangible and intangible property.

4. **Speak up**

If any action or omission occurs from fulfilling the contract in place between IcopalTak and the Supplier that can be considered a breach of the obligations of this Supplier Code of Conduct, this shall be reported to the Standard Industries Ethics Hotline via the [standardindustries.ethicspoint.com](https://www.standardindustries.ethicspoint.com) or telephone without undue delay. IcopalTak reserves the right to assess compliance with this Supplier Code of Conduct (incl. conduct ESG audit at Supplier sites) and take appropriate steps regarding our relationship with any Supplier on that basis.

When a Supplier does not meet this Supplier Code of Conduct requirements (depending on the severity), corrective action plans might be established to ensure compliance within a certain period of time.

The Supplier's failure to adhere to the corrective action plans may result in suspension of that Supplier's relationship with IcopalTak.