Policy for sustainable business practices – Eurosko Gruppen AS

Introduction

Eurosko Gruppen AS strives for a sustainable business that respects people, society and the environment. This policy document, including principles and strategy for sustainable business practices, is the foundation for our work with sustainability.

Eurosko Gruppen AS considers sustainable business practices a precondition for sustainable development, implying that current generations can meet their needs without destroying future generations' possibility to meet theirs[1]. Our hope is to contribute to achieving this, by following our core values in all links in our supply chain. Our core values: engaged, inspired, competent and responsible.

The UN's Sustainable Development Goals are the world's shared plan of action for sustainable development. Eurosko Gruppen AS is working actively with developmental goals. We have an ambition to be a leader in transparency within our industry. To achieve this, we focus on our four strategic pillars: People, Planet, Circularity and Transparency.

We have identified 10 of the goals in "UN Sustainable Development Goals – SDG", where our business can make a substantial contribution.
We are developing our sustainability goals and strategy to channel our projects and our efforts towards these goals.

As a member of Etisk handel Norge, Eurosko Gruppen AS is committed to working actively with due diligence for sustainable business practices.[2] Due diligence is a risk-based approach to respecting and safeguarding people, society and the environment in our own business and in the overall supply chain. We expect our suppliers and partners to follow the same approach.

Requirements for our business

Eurosko Gruppen AS acknowledges that our business practices could have a potentially negative impact on people, society and the environment. At the same time, however, we recognise our potential for contributing to positive development in the supply chain. On this basis, we have created the following principles and requirements for our own business:

Due diligence

Eurosko Gruppen AS will carry out due diligence for sustainable business practices. This means carrying out our own risk assessments of our negative impact on people, society and the environment and stopping, preventing and reducing this impact. These initiatives will be monitored, assessed and communicated to all concerned. If any of our activities are found to be causing or contributing to negative impact on people, society or the environment, we will stop this activity and attempt to restore the damage done. If the supplier is responsible for the negative impact/damage, the supplier will also be responsible for restoration.[3]

---

1 *Brundtland commission, "Vår felles framtid" (Our Common Future), 1987*
2 *UN OHCHR, Guiding Principles on Business and Human Rights (UNGP)", 2011; OECD, "Due Diligence Guidance for Responsible Business Conduct," 2018.*
3 ***OECD's contact point for responsible enterprises, "OECDS veileder for aktsomhetsvurderinger for ansvarlig***

Responsible purchasing practices

Eurosko Gruppen AS considers responsible purchasing practices to be one of our most important measures in working for sustainable business practices. Eurosko Gruppen AS will adapt its purchasing practices in a way that enhances, not undermines, suppliers' potential to meet our requirements to ensure favourable conditions for people, society and the environment. We will strive to build long-term relationships with suppliers that show particular willingness and ability to promote positive development in the supply chain.

The right to organise and worker representation

Eurosko Gruppen AS supports the right to organise and other forms of democratically elected worker representation. We will involve employee representatives and other relevant stakeholder in our work with sustainable business practice.

Supplier development and partnerships

We will, in dialogue with our suppliers, consider contributing any relevant skills development or resources that may be necessary to enable suppliers to meet Eurosko Gruppen AS's requirements relating to the supply chain. This will lay the foundation for good collaboration with suppliers that show a specific willingness and ability to work to promote positive development for people, society and the environment in the supply chain.

Anti-corruption

Eurosko Gruppen AS, including all employees, must never offer or receive illegal or unlawful monetary gifts or other compensation to achieve professional or private advantages for own gain or advantages for customers, agents, authorities or suppliers.

Countries under trade embargo

Eurosko Gruppen AS, including our suppliers and collaborators, must avoid commercial partners with activities in countries that are under a trade embargo by the UN and/or national authorities.

Requirements in regards to the supply chain

We expect our suppliers and partners to work objectively and systematically to comply with our policy for suppliers, including principles for sustainable business practices, covering basic requirements for human rights, workers' rights, anti-corruption, animal welfare and the environment. Our suppliers must:

- Follow our policy for suppliers Code of Conduct, including principles for sustainable business practices.
- Actively carry out due diligence, which means: carrying out risk assessments for negative impact on people, society and the environment and stopping, preventing and reducing such impact. The effect of these measures must be monitored and assessed and communicated to all concerned. If the supplier is responsible for the negative impact/damage, the supplier will also be responsible for restoration.4
- Show a willingness and ability to continuously improve conditions for people, society and the environment through collaboration.
- At the request of Eurosko Gruppen AS be able to document how they, and any other sub-contractors, work to comply with our policy.

---

næringsliv – en innføring", 2018.

4 OECD's contact point for responsible enterprises, "OECDS veileder for aktsomhetsvurderinger for ansvarlig næringsliv – en innføring", 2018

If the supplier, after repeated requests, does not show willingness or ability to comply with our policy for suppliers, the contract may be terminated.

Principles for sustainable business practices (Code of Conduct)

These principles for sustainable business practices are based on UN and ILO conventions and specify minimum, not maximum, standards. On-site regulations must be followed. In cases where national legislation and regulations cover the same area as these guidelines, the highest standard shall apply.

1. Forced labour/Slave labour (ILO convention no. 29 and 105)

1.1. Any form of forced labour, slave labour or involuntary labour is prohibited.

1.2. It is prohibited for workers to provide the employer with a deposit or ID documents. Workers are also free to terminate employment with reasonable notice.

2. The Right to Organise and Collective Bargaining Convention (ILO convention no. 87, 98, 135, and 154)

2.1. Workers have, without exception, the right to establish trade unions freely and also to bargain collectively. Employers must not intervene with, hinder or oppose unionisation or collective bargaining.

2.2. Union representatives must not be discriminated against or prevented from conducting trade union labour.

2.3. If the right to organisation and/or collective bargaining is limited by law, the employer must facilitate and not obstruct alternative mechanisms for free and independent organisation and bargaining.

3. Child labour (UN Convention on the Rights of the Child, ILO convention no. 138, 182, and 79, ILO recommendation no. 146)

3.1. The minimum age for workers must not be under 15 years of age and in accordance with the national legal minimum age for employment, or the minimum age for obligatory education, with the highest age being applicable. If the local minimum age is 14 years, in accordance with the exception in ILO convention 13, this can be accepted.

3.2. Recruitment of child labourers in conflict with the minimum age set out above is prohibited.

3.3. Children under the age of 18 must not perform work that is harmful to their health, security or moral, including working at night.

3.4. A plan of action must be established for the imminent phasing out of child labour in conflict with ILO convention 138 and 182. The plans must be documented and communicated to all relevant staff and other interested parties. Support schemes must be facilitated where children are provided with the opportunity for education until the child is no longer of school age.

4. Discrimination (ILO convention no. 100 and 111, and UN Convention on the Elimination of All Forms of Discrimination Against Women)

4.1. No form of discrimination with regard to employment, remuneration, training, promotion, redundancy or retirement based on ethnic affiliation, caste, religion, age, disability, gender, civil status, sexual orientation, union activity or political affiliation is acceptable.

4.2. Protection against sexually intrusive, threatening, offensive or exploitative behaviour, and against discrimination or unjustified termination due to marriage, pregnancy, parenthood or being HIV positive must be established.

5. Brutal treatment (Universal Declaration of Human Rights/UDHR)

5.1. Physical mistreatment or punishment, or threats of physical mistreatment, is prohibited. The same applies for sexual abuse or other forms of abuse and humiliation.

6. Occupational Safety and Health (ILO convention no. 155 and recommendation no. 164)

6.1. Efforts must be conducted to ensure a safe and healthy working environment. Dangerous chemicals and other substances must be handled in a responsible manner. Necessary measures must be implemented to stop and minimise accidents and health injuries as a result of, or in relation to, the workplace environment.

6.2. Workers must receive continuous and documented training in health and safety. Health and safety training must be repeated for new employees and reassigned employees.

6.3. Workers must have access to sanitary facilities and clean drinking water. Employers must, if necessary, also provide access to facilities for safe food storage.

6.4. If the employer provides accommodation, it must be clean, safe, adequately ventilated and include access to clean sanitary facilities and clean drinking water.

7. Remuneration (ILO convention no. 131)

7.1. Remuneration for workers for a normal working week must at a minimum be in compliance with regulations for minimum wage or the industry standard, with the highest standard being applicable. Remuneration must always be sufficient to cover basic needs, including savings.

7.2. Wage conditions and payment must be arranged in writing by contract before work is commenced. The agreement must be understood by the employer.

7.3. Wage deduction as a disciplinary action is prohibited.

8. Hours of Work (ILO convention no. 1 and 14)

8.1. Working hours must be in compliance with national legislation or industry standards, and must not exceed the number of working hours specified in current international conventions. Normal working hours per week must normally not exceed 48 hours.

8.2. Workers must have at least one day off per 7 days.

8.3. Overtime must be limited and voluntary. Recommended maximum overtime is 12 hour per week, e.g. a total of 60 hours per week. Deviations from this may be accepted if regulated by a collective agreement or national legislation.

8.4. Workers must always receive overtime pay when working overtime in excess of normal working hours (see point 8.1 above), at a minimum rate in accordance with applicable legislation.

9. Regular employment

9.1. Commitments towards workers under international conventions, national legislations and rules on regular employment must not be circumvented through use of short-term engagements (e.g. use of contract workers, casual workers or day labourers), subcontractors or other working relationships.

9.2. All workers have the right to an employment contract in a language they understand.

9.3. Apprenticeship programmes must be clearly defined with regard to duration and content.

10. Marginalised population groups

10.1. Production and the use of natural resources must not contribute to the destruction of resources and sources of income for indigenous peoples or other marginalised population groups, e.g. through confiscation of large land masses or irresponsible use of water or other natural resources that these people depend on.

11. Environment

11.1. Negative environmental impact must be reduced throughout the supply chain. In accordance with the precautionary principle, measures must be carried out to continuously minimise the emission of greenhouse gases and local contamination and the use of harmful chemicals and pesticides, and to ensure sustainable resource extraction and management of water, oceans, woodlands and land and biological diversity.

11.2. National and international environmental legislation and regulations must be observed and relevant emission permissions obtained.

12. Anti-corruption

12.1. All forms of bribery is unacceptable, such as the use of alternative channels to secure illegal private or work-related advantages for customers, agents, contractors, suppliers or their employees, or public officials.

13. Animal welfare

13.1. Animal welfare must be respected. Measures must be implemented to minimise negative impact on the welfare of animals used in production and working animals.

13.2. National and international laws and regulations on animal welfare must be observed.