



# SUPPLIER CODE OF CONDUCT

Lockton Norway AS

---

Version: 2.2  
Issued: 03.03.2025

## 1. Introduction

Environmental responsibility, social impact, and corporate governance (ESG) considerations play an important role in how we approach our business and our culture at Lockton, and we expect the same from our suppliers. The purpose of this Supplier Code of Conduct is to communicate our expectations in a clear manner and to promote responsible business.

Violations of this Code will be taken seriously, and suppliers must report violations to Lockton upon discovery. Suppliers must correct any identified non-compliance with this Code in a timely manner.

Lockton is committed to the principles set forth in this Code and regularly reviews the Code to ensure it aligns with current industry practices and requirements.

## 2. Compliance with Laws and Regulations

We expect our suppliers to proactively monitor and ensure compliance with international laws and applicable local or national laws, including industry specific regulations and standards, where they conduct business.

## 3. Labour Practices and Human Rights

We expect our suppliers to respect internationally recognised human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work.

We also expect our suppliers to comply with applicable local labour laws in countries where they operate.

We expect our suppliers to provide decent\* (see definition below from ILO) working conditions for their employees, including a healthy and safe workplace free from harassment, which ensures their right to respectful treatment, non-discrimination, freedom of association, and a living wage.

Suppliers must take proactive steps to prevent all forms of modern slavery, human trafficking, forced labour, and exploitation within their operations and supply chains.

## 4. Environmental and Social Responsibility

We expect our suppliers to abide by all regulations and legislations related to environmental protection. We also encourage suppliers to work towards minimizing any negative impact on the environment from their business by implementing sustainable business practices. We also expect our suppliers to be socially responsible within the communities they operate.

## 5. Business Ethics and Integrity

We expect our suppliers to maintain high standards of governance and corporate ethics, to promote a zero-tolerance approach to financial crime, such as bribery and corruption, fraud, money-laundering, insider dealing, anti-competition practices and market abuse.

We expect our suppliers to comply with all anti-bribery and corruption laws in all markets and jurisdictions in which they operate. Suppliers must ensure that gifts, entertainment, and hospitality given or received are reasonable, proportionate, and not intended to improperly influence business decisions. We encourage our suppliers to maintain in place anti-bribery and corruption policies, procedures and controls in accordance with applicable laws, regulations and industry best practice.

We further expect our suppliers to comply with sanctions laws and regulations of the European Union, the United Kingdom, the United Nations, and the United States of America, as well as other applicable sanctions laws and regulations in the jurisdictions in which they operate.

We also encourage our suppliers to put in place non-retaliation policies to protect employees speaking up or reporting concerns.

## 6. Data Privacy & Confidentiality

Suppliers must safeguard all confidential, proprietary, and personal data received from Lockton or any third parties and comply with all applicable data protection and privacy laws. Suppliers must implement appropriate security measures to prevent unauthorized access, disclosure, or misuse of data.

## 7. Subcontracting and Supply Chain Responsibility

We expect suppliers to have processes in place to ensure that their own subcontractors and suppliers also comply with this Code of Conduct or similar requirements.

## 8. Monitoring and Compliance

We may carry out audits to verify adherence with this Code of Conduct and expect our suppliers to be cooperative in such case.

---

\*The International Labour Organization (ILO) defines decent work as “productive work for women and men in conditions of freedom, equity, security and human dignity”.

In general, work is considered as decent when:

- it pays a fair income
- it guarantees a secure form of employment and safe working conditions
- it ensures equal opportunities and treatment for all
- it includes social protection for the workers and their families
- it offers prospects for personal development and encourages social integration
- workers are free to express their concerns and to organise



**Lockton Norway AS**

Lockton Norway AS is registered in Norway with company number/Org.nr: 991 407 227.  
Lockton Norway AS is authorised and regulated by the Financial Supervisory Authority of Norway (Finanstilsynet).

[global.lockton.com/no/en](https://global.lockton.com/no/en)