

Ethical Guidelines – Factlines AS

Adopted by Factlines' Board of Directors Oct 16. 2019.

All Factlines activity shall be known for and held to a high ethical standards.

The Board, 10/16.2019.

1. Background and general principles

All employees of Factlines, and anyone acting on behalf of Factlines, shall act in accordance with good business practice, applicable legislation and general ethical norms.

These ethical guidelines concern the Factlines' relationships with its customers and responsibility to the society.

2. Purpose

Our guidelines shall ensure compliance with environmental sustainability and corporate social responsibility in Factlines' activities and relationships with others.

3. To Whom the guidelines apply

The guidelines apply to all employees of Factlines including consultants, all board members or elected representatives when acting on behalf of Factlines. Managers have a particular responsibility to ensure that their employees are familiar with, and act in compliance with, the guidelines.

The requirements in Factlines' ethical guidelines are minimum requirements. Everyone must follow the legislation, regulations and internal rules that apply to the organisation.

4. Relationship with clients, suppliers and other business contacts

4.1 Duty of confidentiality

All information related to individual client or supplier's business operations that can represent competitive importance shall be treated as confidential.

4.2 Relationship with business contacts

It is natural that friendships develop between employees of clients and the suppliers in long-term agreements. These relationships must not influence decision making processes. Extra caution must be exercised before and during the process of cooperation.

Anyone acting on behalf of Factlines has a duty to build confidence in Factlines' decisions and safeguard the Factlines' reputation.

4.3 Improper advantage and corruption

Corruption is abuse of trust for personal gain. Corruption occurs when a person requests, receives or accepts an offer of an improper advantage or reward by virtue of the position, office or assignment he/she holds. Both the giver and the recipient of such benefits can be convicted of corruption.

Trading in influence or influence peddling is also punishable by law. Trading in influence occurs when a person for him-/herself or others requests, receives or accepts an offer of an improper advantage in return of influencing the conduct of position, office or assignment, or gives or offers anyone an improper advantage in return for influencing the conduct of a position, office or assignment.

Corruption and trading in influence are criminal offences and punishable under the Norwegian Penal Code. Both the individual person and the organisation found guilty of corruption or trading in influence are punishable by imprisonment or fines.

5. Ethical trade

Factlines shall be a driving force for ethical trading and takes obligation to set requirements for an ethical supply chain. Factlines is committed to work for an improvement of labour and human rights and the environment in the production of goods and services. Therefore, we set ethical requirements when a risk assessment of a product and supply chain indicates so. Factlines applies its own system for monitoring the suppliers. www.factlines.com

The requirements are based on UN and ILO conventions and apply in addition legislation on the production site.

Factlines shall support and respect protection of internationally proclaimed human rights and ensure that they are not violated.

Factlines shall uphold the freedom of organisation and ensure that the right to collective bargaining is recognized in practice, do its part to ensure that all forms of forced labour, child labour and discrimination in employment are abolished.

6. Environment

Factlines shall support a precautionary approach to environmental challenges, undertake initiative to promote environmental responsibility and encourage the development and spreading of environmentally friendly technologies.

Factlines shall make environmentally friendly procurements where costs related to the use of product throughout its entire lifetime (life cycle costs) and the environmental impact of its manufacture and disposal shall be considered.

It is implied that everyone should be able to participate in an equal manner, as far as possible, without any special adaptations or aids.

Before any procurement the underlying need must always be considered carefully. Reduced consumption can yield substantial environmental benefits.

7. Loyalty to agreements

All employees of Factlines and anyone acting on behalf of Factlines are required to comply with the contracts that have been signed for the purchase of goods or services. Purchase of goods outside of the contracts may undermine Factlines' reputation.

8. Sanctions in case of violations of the applicable regulations

Disciplinary action may be taken if an employee attempts to circumvent or violate any applicable regulations. Depending on the severity of the breach, violation of the regulations may result in a verbal or written warning, termination of employment, dismissal without notice, and, as applicable, filing an official report. Violation of the Norwegian Penal Code decisions may also result in public prosecution under criminal law. Employees in doubt as to how the guidelines should be interpreted should contact their immediate supervisor.

Checklist:

Do my actions / inactions strengthen Factlines' credibility?

Are my actions / inactions legal and consistent with our Code of Conduct?

Are my actions / inactions influenced by personal interests or conflicts of interest?

Are my actions / inactions public and transparent?

Are my actions / inactions consistent with Factlines' high business ethical standards?