Fell Tech Code of Conduct

This Code of Conduct is the foundation for how we work. By integrating sustainability in Fell Tech's operations, we are convinced that we create long term value for Fell Tech, as well as for our business partners.

ACCOUNTABILITY

OPENNESS

SIMPLICITY

Background

Fell Tech aims to be the instinctive choice of customers and suppliers for the purchasing and distribution of installation products, tools and supplies. Fell Tech seeks to ensure it has the most satisfied customers in the industry and the highest employee commitment, and to create sustainable and profitable growth.

Fell Tech aims to take the lead within sustainability and to take clear economic and social responsibility. Sustainable enterprise involves work in several dimensions. Among other things, we are working to develop more sustainable products, conduct responsible procurement and minimise our environmental footprint.

Our values – accountability, openness and simplicity – guide us in our day-to-day work. Together with our Code of Conduct, which summarises our overall guidelines for responsible conduct, they provide a framework for how we should behave in our daily activities. Since our business partners are an important part of our operations, we also expect them to respect and stand by our values and behavior.

Fell Tech's Code of Conduct is based on:
- The UN's Universal Declaration of Human Rights and associated UN Conventions
- The ILO's Principles concerning Multinational Enterprises and Social Policy
- OECD Guidelines for Multinational Enterprises
- The UN Global Compact
- ISO 14001 and 9001

Christian Frost Røine
Group CEO
Fell Technology AS

17.11.2022

Scope

Our Code of Conduct applies to all employees of the Fell Tech Group and all business partners. Our Code of Conduct is used in our evaluations of business partners.

Compliance with laws

The Code of Conduct does not replace legislation and Fell Tech must always comply with legal requirements and regulations in the countries in which we operate. The same requirements apply to our business partners. If there is a conflict between the Code of Conduct and the law, the law shall prevail. However, if the Code of Conduct sets a higher standard than existing legislation, the Code of Conduct shall apply.

Implementation and compliance monitoring

Fell Tech's CEO has overall responsibility for implementation and compliance with Fell Tech's Code of Conduct. The country managers are responsible for implementation and compliance in each country and segment.

It is the responsibility of employees to ensure that they understand and comply with the content of the Code of Conduct and the related document. Managers are also responsible for ensuring that each employee is updated on current policies during the annual employee dialogue.

We continuously monitor compliance of our operations with our obligations under the Code of Conduct and provide annual Code of Conduct training to our employees. The Code of Conduct is also part of the introduction program for new employees.

Reporting malpractice

If you believe that Fell Tech is not acting in accordance with this Code of Conduct or that Fell Tech's business partners do not meet the conditions of the Code of Conduct, we encourage you to report this to Fell Tech using contact us at www.felltech.no.

Supplier monitoring

By approving Fell Tech's Code of Conduct, a supplier ensures to comply with all applicable parts. The suppliers are responsible for ensuring that their sub-suppliers comply with this code. It also grants Fell Tech the right to verify compliance with this Code of Conduct by means of different types of on-site inspections or other measures. Any suspected breach of Fell Tech's code of conduct will lead to immediate measures.

Suppliers who sign an agreement with Fell Tech shall be responsible for implementing and monitoring compliance with the Code of Conduct in all applicable parts.

Responsible extraction of minerals

Conflict minerals are minerals from high-risk and conflict-affected areas, the use of which directly or indirectly contributes to the financing of armed groups likely to commit serious human rights violations. Fell Tech is committed to the ethical sourcing of minerals used in our products and is working with suppliers to address the process for sourcing minerals responsibly.

In addition, we are committed to engaging with our customers regarding their disclosure obligations.

Business ethics

Fell Tech's conduct in all situations, regardless of the country or market, shall be characterized by responsibility and respect for customers, suppliers and the local communities in which we operate. Ethical conduct and good business practice are crucial to our development and profitability. We shall convince our business partners only with commercial arguments. The goal is to develop long-term, stable business relationships in which Fell Tech is considered a responsible and professional partner.

Fair competition

We never enter into contracts or agreements – either explicitly, implicitly, verbally or in writing – with a competitor regarding pricing, discounts, promotions, tendering, sales terms or sales territory. We do not exchange sensitive market information with our competitors, either directly or through trade associations, suppliers or customers.

Bribery

Bribery, corruption and any other form of corrupt conduct are strictly prohibited. Neither Fell Tech nor any company acting on behalf of Fell Tech may grant, offer or promote payments, gifts or other benefits that may affect or be perceived as affecting the objectivity of a business decision or a public authority decision. In the same way, neither Fell Tech nor any company acting on Fell Tech's behalf may accept, receive or request gifts or other benefits.

Conflicts of interest

Conflicts of interest between Fell Tech and its business partners must be avoided. Examples of conflicts of interest include personal financial interests and purchase or sale transactions with family members or close friends. We always place Fell Tech's interests ahead of personal interests.

Privacy

Fell Tech is committed to high standards of information security, privacy and transparency. We place a high priority on protecting and managing data in accordance with applicable privacy laws.

We may collect and process personal data e.g. in the form of contact details of personnel within your company, for the purposes of business operations. Confidential employee information is maintained securely. We will not disclose any information to any company outside the Fell Tech Group except if required to do so by law.
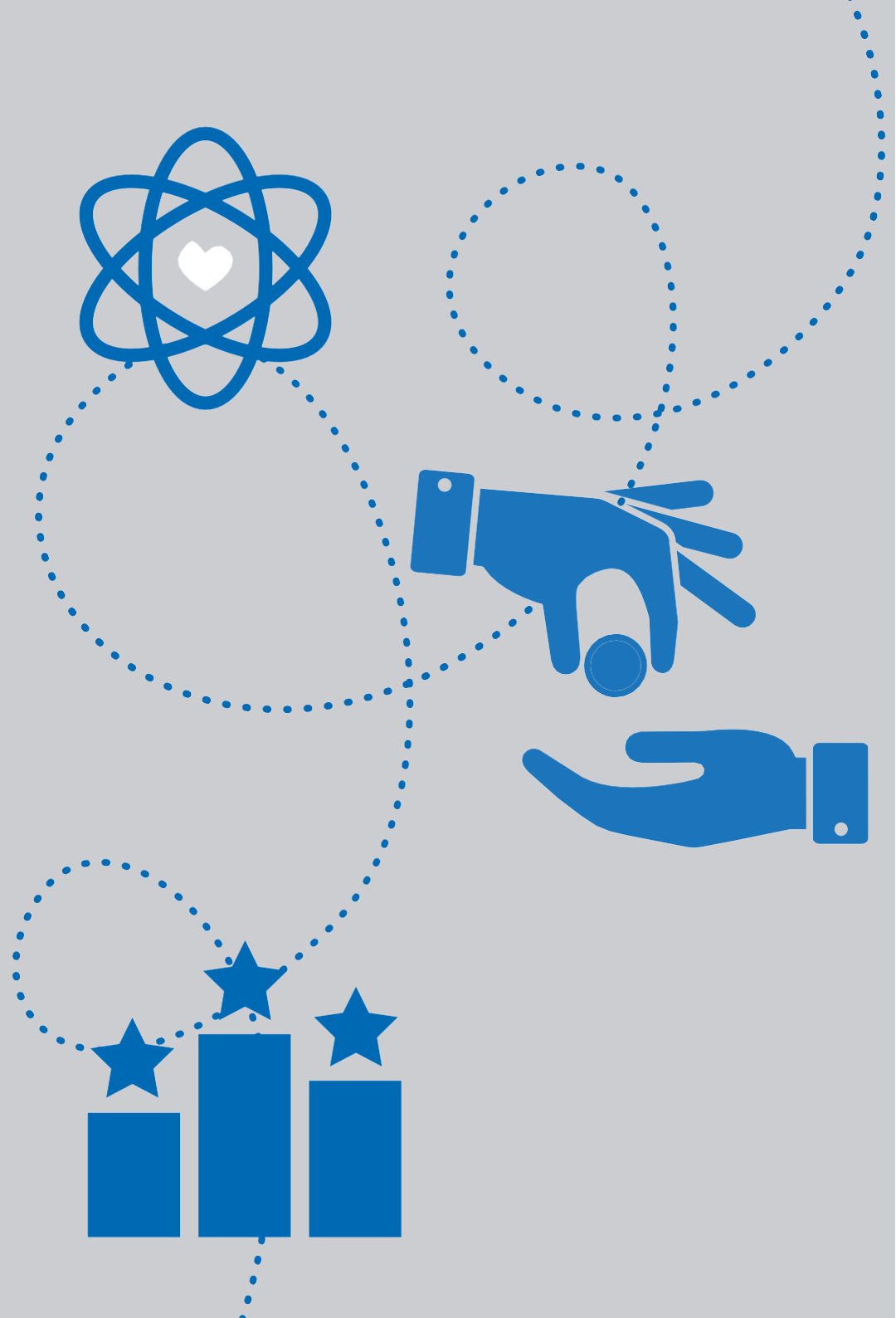
Human rights

Fell Tech works actively to treat our employees fairly, equally and with respect.

Child labour
Every child shall be protected from economic exploitation and performing any work that may be harmful to the child's physical or mental health or adversely affect the child's right to education.

In this context, a child is a person under the age of 15. If relevant national legislation prescribes a higher age, this shall be the age that applies.

Fell Tech does not accept child labour. If it emerges that a child is manufacturing products, the employer must act on the basis of the child's best interests.
Fell Tech's partners are expected to work together to reach a satisfactory solution that improves the situation of the individual child.

Forced labour
No form of forced labour or work connected with any form of punishment is permitted. The employees must have the freedom of movement during the course of their employment. The employer must not withhold identity cards, travel documents and other important personal papers of its employees, and thereby preventing the employees from ending their employment.

Freedom of association and collective bargaining
Fell Tech respects employees' rights to organise themselves, or not to organise themselves, in trade unions and to negotiate collectively or individually in accordance with local laws. No employee should face harassment or reprisals in order to exercise these rights.

Employment contracts, employment terms and remuneration

Working hours must comply with national legislation. Employees should be paid the minimum wage required under local law and regulations. Overtime should be paid for at a premium rate. Wages must be paid on a regular basis. Deductions from wages should be transparent and must never be used as a disciplinary measure.

All workers should have a written, understandable, and legally binding labour contract. The employer should not rely on part-time, short term or casual labourers, trainees, or false apprenticeships to pay lower wages and fewer benefits.

Employees on parental leave must not be fired or threatened with dismissal, and must be free to return to their former employment at the same rate and benefits.

All workers should have access to clean drinking water and toilets, adequate for the number of employees. When accommodation is provided it must be suitable for its purpose and meet the same requirements stated in previous sentence.

Diversity and equality

Fell Tech values and promotes diversity and gender equality. We are committed to maintaining an environment based on respect for each person's unique and equal worth and realise everyone's full potential by promoting an inclusive culture. Fell Tech shall work to ensure that active measures are taken to achieve equal rights and equal opportunities at work, regardless of ethnicity, gender, gender identity, disability, religion or belief, sexual orientation and age.

Discrimination and harassment

Fell Tech is opposed to all forms of discrimination, harassment and degrading treatment and shall take action to combat discrimination on these grounds. All incidents of discrimination and harassment, no matter how large or small, will be given immediate attention.

Occupational health and safety

Fell Tech works systematically for a safe and healthy work environment. Risks that may lead to accidents or health impairment should be dealt with promptly.

Work environment
Our work environment activities are based on national legislation in our countries of operation. For Fell Tech, a safe work environment means, for example, proactive risk management, competence for performing tasks safely, open dialogue, continuous improvements, clean workplaces, safe machinery in production and providing necessary personal protection. Fell Tech shall work for the right attitude and behavior for a good safety culture.

Hazardous materials and dangerous equipment must be stored, handled and transported in accordance with applicable legislation. Emergency exits must be clearly marked. Exits must not be blocked and must be well-lit. All employees shall be informed of safety measures, such as emergency exits, fire extinguishers and first-aid equipment etc.

Alcohol and/or drug abuse
Fell Tech will work against exclusion from work and take responsibility in creating a society free from drug and alcohol abuse. In the process of creating safe and secure workplaces, it is necessary to take measures to prevent and combat the adverse consequences of harmful substance use. Fell Tech has zero tolerance for alcohol and other drugs during working hours. The purpose is to prevent ill health, accidents and harmful use.

Environment and quality

Fell Tech works actively to reduce the environmental impact from our operations, focusing on products, transport, energy use and waste. Fell Tech takes quality and the environment into consideration in every part of our business. Fell Tech must comply with statutory environmental requirements that apply in each country of operation.

Fell Tech supports and encourages sustainable innovation to meet customer demand.

Stakeholders' expectations are taken into consideration in quality and environmental matters. This means that dialogue with customers, suppliers and other partners is a source of renewal and improvement.

Fell Tech is certified under ISO 9001 and 14001 by 2024 and expect our suppliers to implement environmental and quality management systems.