



BAMA'S CODE OF ETHICS AND BUSINESS CONDUCT

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bama



«Clarity in our ethical stance ensures a positive workplace culture and supports sound decision-making. This commitment to integrity is vital to the success of BAMA Gruppen, to every individual on our team, and personally, to me».

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MESSAGE FROM THE CEO

As the CEO of BAMA Gruppen (BAMA), a global leader in the fresh produce industry, I want to emphasize the integral values that define our mission and drive our collective efforts.

BAMA ranks among the top ten global specialists in fresh fruit and vegetables, with expanding operations in the Nordic region and across Europe. Our influence extends beyond market presence; it embodies a commitment to fostering societal well-being.

Our many dedicated employees across various countries embody our commitment daily, striving to nurture a healthier future, uphold ethical business practices, and implement sustainable solutions along our value chain. For years, we've championed initiatives like "5-a-day" to improve public health, targeting not only children and youths but also adults. Our mission remains steadfast: to promote a healthier lifestyle for all.

At BAMA, we operate within a robust ethical framework which articulates our identity, principles, and professional standards, as defined by our vision, values, and this Code of Ethics and Business Conduct. Our suppliers are also held to these high standards through our Code of Conduct for Suppliers and Business Partners.

Clarity in our ethical stance ensures a positive workplace culture and supports sound decision-making. This commitment to integrity is vital to the success of BAMA Gruppen, to every individual on our team, and personally, to me.

Our board and our management team are unwavering in their dedication to responsible business conduct. We engage actively with our suppliers, partners, and stakeholders to address the environmental, social, and governance challenges within our industry. Through rigorous sustainability and human rights due diligence, we aim to mitigate any adverse impacts on the environment, individuals, and the communities we serve.

Together, let us continue to be exemplars of the change we wish to see, ensuring BAMA's legacy as a force for good in the world.

Bent Andersen
CEO/Konsernsjef BAMA Gruppen

TABLE OF CONTENT

Message from the CEO

2

1 | ABOUT THE CODE OF ETHICS AND BUSINESS CONDUCT

1.1	Our commitments	5
1.2	Breaches and sanctions	6
1.3	Seek guidance!	6
1.4	SPEAK UP!	6

2 | THIS IS BAMA

2.1	Our vision and values	8
2.2	We are responsible, and we act with integrity	9

3 | OUR RULES FOR RESPONSIBLE BUSINESS CONDUCT

3.1	We assess conflict of interest in our operations	11
3.2	We integrate Health, safety, and environment (HSE) in our culture	12
3.3	We respect human rights and decent working conditions	13
3.4	We care about the natural environment	14
3.5	We assess the business integrity of our suppliers and other business partner	14
3.6	We have zero tolerance for corruption and bribery	15
3.7	We have clear principles for gifts and hospitality	16
3.8	We are committed to fair competition	17
3.9	We protect our business, property and assets and report accurately	18
3.10	We follow regulations on sanctions and export control	18
3.11	We are committed to prevent money laundering and tax evasion	19
3.12	We protect and treat our information confidentiall	20
3.13	Our public communication is consistent and issued from authorized representatives	20

Always remember

21

A man in a blue and white striped short-sleeved shirt and blue jeans stands in a dirt path between rows of grapevines. The sky is filled with soft, white clouds, and the lighting suggests late afternoon or early morning. The man is looking slightly to his left.

1 | ABOUT THE CODE OF ETHICS AND BUSINESS CONDUCT

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1.1 | OUR COMMITMENTS

The Code of Ethics and Business Conduct (the Code) establishes our commitments, expectations, and requirements for responsible business conduct in BAMA. Our Code is based on the declaration of principles from the member organization Ethical Trade Norway, of which BAMA is a member, as well as on the OECD Guidelines on Responsible Business Conduct¹.

The standards described in the Code apply to all of us: employees, hired personnel, managers, directors and board members, as well as people acting on behalf of BAMA. BAMA not only sets strict ethical requirements for our own operations, but also for our supply chain; a separate Code of Conduct has been established for BAMA's suppliers, business partners and other third parties setting out BAMA's requirements and ethical standards applicable to these. All subsidiaries in BAMA

Gruppen shall follow this Code, or a local Code of Conduct with equivalent standards.

We all have a personal responsibility to make sure that all activities in BAMA comply with this Code and other internal processes and procedures, as well as applicable legislation in all markets we operate. If there is a difference between a legal requirement and this Code, the most stringent standard shall apply.

We rely on you to act with integrity and exercise good judgment. This Code is also meant to be a compass and guiding tool for navigating in challenging situations.

¹ <https://mneguidelines.oecd.org/>



When considering an action while conducting business for BAMA, ask yourself:

- Is it legal?
- Is it in line with BAMA's values, the principles of this Code and other governing documents?
- Is the activity conducted with openness and transparency?
- Would both you and BAMA be comfortable with the activity being publicly exposed?

→ If you cannot answer "yes" to all these questions, you should consider a different course of action. When facing uncertainty or an ethical dilemma, seek guidance!



1.2 | BREACHES AND SANCTIONS

All activities conducted at work for BAMA shall comply with applicable laws and regulations, this Code and other internal procedures and guidelines.

Actions of misconduct contrary to these standards may have severe consequences for our competitiveness and reputation. Breach of these standards will therefore be followed up. For employees, this can entail disciplinary consequences which in the most serious cases result in termination or dismissal, as well as reporting to the relevant public authorities.

1.3 | SEEK GUIDANCE!

Ethical dilemmas can arise in different business situations, and deciding what is right or wrong is not always straightforward. If you have questions related to the topics in this Code or if you need advice in making ethical business decisions, you may discuss the issue with your colleagues or your Manager. You may also reach out to Compliance, Legal or HR for guidance.

- Compliance@bama.no
- Legal@bama.no
- HRpost@bama.no

1.4 | SPEAK UP!

If you experience, witness, or have reasonable concern that misconduct has taken place, you should report your concern immediately.

We believe that openness and good communication throughout the organization promotes a better work culture. We therefore encourage you to speak up and report an issue of concern when you suspect actual or potential breaches of law, this Code, internal policies, procedures or ethical norms, or other wrongdoings that affect employees, suppliers, business partners, customers, BAMA or the public in general. Speaking up ensures compliance, reduces misconduct, and can prevent damaging incidents from occurring. Employees as well as external stakeholders shall feel safe in speaking up without risking any retaliation as long as reports are made in good faith.

You can find more information on how to **SPEAK UP** here:

<https://www.bama.no/om-bama/varsling/>



2 | **THIS IS
BAMA**

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2.1 | OUR VISION AND VALUES

BAMA's vision "A HEALTHIER AND FRESHER FUTURE" gives clear guidance on our social role, our decisions and our conduct. Our business concept is to create responsible, green growth through fresh and healthy products, based on cooperation throughout our entire value chain.

The Code of Ethics and Business Conduct (the Code) is based on our values and ambition to be Goal-oriented, Inspiring, Responsible and Collaborative. Our values are of major importance for the way we deal with our customers, partners and employees. By living up to our values, we will create a good workplace, be an attractive employer and help ensure that we jointly create value in the right way.

We trade fresh, high-quality products from producers across Norway, and from all continents. This makes us a major global player and includes a responsibility to act accordingly. We strive to conduct our operations in such a way that the external environment is preserved, that the rights of employees and other stakeholders in the value chain are safeguarded, and that our products are fresh and healthy, in line with the customers' expectations.

At BAMA, we have the courage to do the right thing. Displaying transparency, honesty and integrity empowers us to take responsibility for our choices and our actions.



BAMA's responsibilities, as a corporate entity:

- Set high standards of integrity for our operations and communicate these standards to our employees through this Code and other governing documents. .
- Provide all employees with the training and tools necessary to address ethics and compliance issues they may face in their work.
- Ensure that any reports of violations are treated confidentially and responsibly, in compliance with laws and regulations.



2.2 | WE ARE RESPONSIBLE, AND WE ACT WITH INTEGRITY

At BAMA, we are responsible, both as corporate entities and as individual employees. If you are an employee with a leading role (Manager) you have significant influence on people and operations, and therefore you have additional responsibilities. We all represent BAMA, also outside the workplace.

At BAMA, we shall act with integrity and be respectful of our colleagues, customers, suppliers and other business partners, as well as others that we encounter in our daily work. We shall strive to do the right thing, even when we encounter difficulties and dilemmas.



As a BAMA employee, I am expected to:

- Familiarize myself with the content of this Code.
- Behave in line with the principles and requirements in this Code and be a good ethical ambassador for BAMA.
- Seek guidance if I am in doubt about whether a decision is compliant with this Code, other governing documents and applicable laws and regulations.
- Speak-up and report if I suspect, observe or experience any violation of this Code, other governing documents and/or applicable laws and regulations.
- Actively participate in ethics and compliance training.



As a BAMA Manager, I am expected to:

- Lead by example and uphold and promote the standards and requirements in this Code and guide my team in how to do the same.
- Promote and ensure a speak-up culture by creating a transparent, fair, and trusting working environment. Encourage employees to raise questions and concerns, and to discuss their dilemmas. Support individuals who report concerns or violations. A case that is reported to me shall be handled with integrity and professionalism, and I will never take or allow retaliatory action against anyone who reports a concern in good faith.
- Monitor compliance with the Code and ensure that all required training for my team is completed.
- Respond to breaches of the Code with appropriate measures, depending on the seriousness of the breach. This might include training, disciplinary consequences, reporting to your superior or to relevant public authorities.



3

**OUR RULES FOR
RESPONSIBLE
BUSINESS CONDUCT**

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3.1 | WE ASSESS CONFLICT OF INTEREST IN OUR OPERATIONS

A conflict of interest is a situation where our own personal and/or financial interest may be in conflict with the interest of BAMA.

A conflict of interest can be either:

- **actual** (has occurred or is occurring),
- **potential** (might occur given certain relations or circumstances) or
- **perceived** (might be interpreted by others as a conflict of interest).

We seek to avoid situations where such conflicts may arise. However, when they do arise, we need to manage them in a transparent and professional manner. As a BAMA employee, you have the right to manage your personal affairs and investments. However, you are expected to be loyal to BAMA and not engage in affairs that could have conflicting interests with the interests of BAMA. It is your individual duty to assess whether such a conflict of interest could arise and to address it with your Manager.

Conflict of interest can be related to yourself, a family member, or a close friend. A “family member” includes your spouse, romantic partner, children, parents, siblings, cousins, nephews, nieces, aunts, uncles, grandparents, grandchildren, and in-laws. A “close friend” could include all kinds of personal non-family relationships, such as neighbors, former colleagues, friends from university, school, etc.

Some examples of situations that may represent a conflict of interest, where you should discuss with your Manager:

- Recruiting or managing family members or close friends.
- Having financial interests in a business partner, supplier, customer or competitor of BAMA.
- Having family members or close friends work or perform services for a business partner, supplier, customer or competitor of BAMA, depending on their role and your own role.
- Having employment or other appointments outside of BAMA that could potentially interfere with your ability to perform your professional duties for BAMA.



How does it affect me?

- Do not participate in business decisions in cases where your independence (impartiality) may be called into question, where there may be an actual, potential, or perceived conflict of interest.
- Be open, disclose and discuss with your Manager any actual, potential, or perceived conflict of interest so that the conflict can be avoided or managed properly.
- As a Manager, a conflict of interest that is reported to you shall be managed with appropriate actions and documented.





3.2 WE INTEGRATE HEALTH, SAFETY, AND ENVIRONMENT (HSE) IN OUR CULTURE

As BAMA employees, we are responsible for both our own safety and the safety of others, and we shall all contribute to preventing occupational accidents and injuries. We integrate health, safety, and environmental thinking in our everyday work, making sure we comply with all applicable HSE policies, procedures and requirements. As a Manager, you shall ensure and monitor compliance with internal and external HSE requirements and work actively to reduce risks within your area of responsibility.



How does it affect me?

- Understand the risks at my location and act according to safety procedures.
- Contribute actively to preventive HSE work, e.g. by reporting hazardous situations and promoting improvement proposals.
- Speak up, report, and stop any kind of dangerous/unsafe activity immediately.

BAMA is a drug-free workplace. It is prohibited to be under the influence of alcohol, illegal drugs or any other intoxicants while performing work. This includes all use of intoxicants which, during either working hours or leisure time, could affect the execution of the work in the business, the working environment or BAMA's reputation.

As an exception, moderate amounts of alcohol may be acceptable as part of business entertaining events or internal social events, provided that the consumption is not combined with the operation of machines or vehicles, or other work-related tasks that are incompatible with the consumption of alcohol.



How does it affect me?

- Never perform your regular work for BAMA under the influence of drugs, alcohol, or other intoxicants. Moderate consumption of alcohol in connection with representation or a business-related event is the exception to the general rule.
- Moderate consumption means that you shall show moderation and be cautious with your own alcohol consumption. Always make sure non-alcoholic alternatives are available.

3.3 | WE RESPECT HUMAN RIGHTS AND DECENT WORKING CONDITIONS

We conduct our business with respect for human rights, labor rights and human dignity, and we ensure that all employees are entitled to and informed of basic rights and conditions of employment.

We strive to have a healthy and safe workplace in accordance with applicable HSE policies, free from harassment, discrimination, harsh treatment, and exploitation. As a BAMA employee, we are free to lawfully join or form trade unions and have the right to individual or collective bargaining.

We all benefit from a diverse and inclusive working environment that is safe both physically and psychosocially. We are all be responsible for contributing to a culture based on respect, fairness, equality, and inclusion. We respect each other's differences in customs and culture.

At BAMA, we will not tolerate any form of discrimination. Discrimination includes all unequal treatment, exclusion or preference based on ethnicity¹, caste, religion, age, disability, gender, marital status, sexual orientation, union membership/work or political affiliation. Employees with the same experience, performance, and qualifications should receive equal pay for equal work.

Furthermore, we will not tolerate any form of harassment, including sexual harassment. Harassment is any unwanted behavior towards another person that



How does it affect me?

- Take responsibility to create and maintain a safe and healthy working environment for yourself, your colleagues and business partners. Treat everyone with respect, fairness, and dignity.
- Never engage in any kind of hostile or intimidating behavior. Offensive or degrading remarks and jokes are not acceptable.
- Speak up and report if you suspect, observe, or experience any form of discrimination, harassment or otherwise violation of human rights and decent working conditions at your workplace or elsewhere in BAMA or the supply chain.

creates a hostile, intimidating, humiliating, degrading or offensive work environment, thereby affecting a colleague's dignity or psychological wellbeing.

² Ethnicity refers to, among other things, national origin, descent, skin color, and language.



3.4 | WE CARE ABOUT THE NATURAL ENVIRONMENT

The whole world is affected by climate change. Among other things, climate change will affect the access to food and water and the quality of crops worldwide. At BAMA we aim to reduce our carbon footprint on the environment both in our own operations and in our supply chain. We work continuously to reduce our carbon emissions and optimize our resource utilization, by setting requirements for transport services and improving procedures related to product handling, packaging, and distribution. We support and aim for a culture and economy for reuse, recycling, and reutilization of resources.



How does it affect me?

- Contribute actively to efficient use, reuse, recycling, and reutilization of resources.
- Contribute to the continuous improvement of our processes and procedures in order to reduce our carbon emissions and waste depositions.
- Ensure that environmental impact is taken into account when making business decisions, including the use of environmentally friendly technologies.



3.5 | WE ASSESS THE BUSINESS INTEGRITY OF OUR SUPPLIERS AND OTHER BUSINESS PARTNERS

Our suppliers and other business partners are essential to BAMA, and we will treat them with respect and fairness. We consider responsible purchasing practices to be an important tool to conduct our business responsibly. We acknowledge that our suppliers and business partners could potentially expose us to reputational, operational, and legal risk. We will assess the business integrity of our suppliers and business partners, and we will prioritize suppliers and business partners with high ethical standards and willingness to continuously improve through our collaboration.

We expect our suppliers and business partners to comply with applicable laws, respect human rights and adhere to our ethical standards. BAMA's suppliers and business partners are required to comply with our Code of Conduct for BAMA's suppliers and business partners. At BAMA we actively work with due diligence assessments for responsible business conduct, and we map the risk of negative impact on people, society and the environment, both in our own operations



How does it affect me?

- Make sure adequate assessment of the business integrity is performed before entering into an agreement with a supplier or other business partner.
- Ensure that compliance with the Code of Conduct for BAMA's suppliers and business partners are regulated in contracts, with possible sanctions in case of non-compliance.
- Communicate expectations and follow up on a regular basis in order to ensure that suppliers and business partners meet our expectations and requirements.

and in the supply chain. Where our activities cause or contribute to such negative impact, we will follow up and implement measures to stop, prevent and reduce the impact. Measures are monitored and their effect evaluated, and we will seek to provide remediation where required.

We also expect that our suppliers and business partners actively work with due diligence assessments in a similar manner.

3.6 | WE HAVE ZERO TOLERANCE FOR CORRUPTION AND BRIBERY

At BAMA we have zero tolerance for all forms of corruption and bribery, including facilitation payments. We will act with professionalism, transparency, and honesty, and we will adhere to all relevant national and international anti-corruption laws. Corruption is defined by Transparency International as the abuse of entrusted power for private gain.

Corruption undermines public trust, aggravates social injustice, and distorts market mechanisms, leading to unfair competition. It is a serious crime, and any such exposure would have severe impacts for BAMA and for all individuals involved.

In practical terms, corruption is the act of:

demanding, receiving or accepting, for oneself or for other persons, an undue or improper benefit, in order to influence a business decision or process, or to offer or give anyone the same.

This includes decisions related to positions, assignments and projects. An undue or improper benefit applies to a wide range of benefits, including (but not limited to) cash and tangible gifts, cost coverage, discounts, payment of travel or accommodation, attendance to social events, as well as personal and professional favors and services. Bribery is also used to describe the act of offering or receiving an improper advantage. Any bribe is regarded as corruption and thus prohibited.

Facilitation payments, also referred to as “grease payments” or “palm greasing”, are payments of smaller sums of money to facilitate or expedite the performance of routine government functions, such as issuing permits or licenses or processing government papers. Any facilitation payment is regarded as corruption and thus prohibited in BAMA.

Special caution shall always be demonstrated during negotiations, decision-making processes, bids, tenders and similar situations as the risk of misconduct, or the appearance of misconduct, is increased. Similarly, special caution shall be taken when dealing with public officials. Payment of money or giving anything else of value to any public official, directly or indirectly, is never permitted.



How does it affect me?

- Never demand, offer, give, receive, or accept an undue or improper benefit from a supplier, business partner, customer or other business associate that could potentially influence a business decision or process.
- Never make facilitation payments on behalf of BAMA, directly or indirectly through a third party, unless your health or safety is endangered. All requests for facilitation payments shall be reported to your Manager or through BAMA's Speak Up reporting channel.



3.7 | WE HAVE CLEAR PRINCIPLES FOR GIFTS AND HOSPITALITY

At BAMA, we value the building and maintaining of good business relationships with customers, suppliers and other business partners through networking and social interaction. However, we are cautious of the risk that may arise from the exchange of gifts and hospitality, such as meals and entertainment events. These activities may create a conflict of interest, as well as the appearance of misconduct and undue benefits. We must therefore adhere to some basic principles when engaging in any offering or acceptance of gifts or hospitality activities. Your manager shall always be informed of your gifts and hospitality activities, both giving and receiving.

As a main rule, we avoid offering or accepting gifts at BAMA. However, courtesy gifts or promotional items of modest value, related to a business event might be appropriate under certain circumstances, such as thanking people giving a speech at a conference. Courtesy gifts may be flowers, a book, a modestly priced bottle of wine, chocolate or similar. Monetary gifts or gift cards convertible to cash are never acceptable as courtesy gifts.

On the rare occasion where it would clearly be considered offensive to refuse a more expensive gift, e.g., for cultural reasons, the gift may be accepted. This shall be reported to your Manager and to Compliance@bama.no without delay, and the gift will be the property of BAMA.

Any travel and accommodation cost for BAMA employees related to hospitality events, shall be paid by BAMA. Likewise, our suppliers and other business partners shall pay their own cost for travel and accommodation. BAMA shall to the extent possible ensure that gifts and hospitality arrangements are in line with the guidelines of the recipients' organization.

Gifts and hospitality, including related travel, shall always be business related, modest and reasonable in value. Such activity shall not be conducted on a frequent or repetitive basis and never be intended to influence a business decision or give the appearance of doing so. All activities involving gifts, hospitality and related travel shall be documented to clearly show the legitimate business purpose and the cost/value. Such documentation shall be stored locally, typically along with the accounting documents, and presented upon request.

When we exchange product samples, the samples must not exceed the extent and the amount necessary to review and acquire knowledge of the product. Any exchange exceeding this necessary amount, will be considered a gift.

Sponsorships and charitable donations pose potential risks related to conflict of interest and appearance of misconduct. Any sponsorships or charitable donations shall therefore always follow BAMA's formal approval processes. BAMA prohibits sponsorships and charitable contributions linked to a political party or a politician, or otherwise of a political nature.



How does it affect me?

- Gifts should as a main rule only be courtesy gifts or promotional items of minimal value.
- Ensure activities related to hospitality and arrangements are appropriate and proportionate considering the related business activity. Cost of travel and accommodation should be covered by each party respectively.
- Ensure gifts or arrangements are clearly acceptable in the view of others, that they are offered or accepted in full openness and transparency.

When facing uncertainty or an ethical dilemma, remember that you should always seek guidance as described in sections 1.3. of this Code.

3.8 | WE ARE COMMITTED TO FAIR COMPETITION

At BAMA we are committed to fair and open competition. We shall under no circumstances engage in unlawful price fixing, unlawful market sharing, or other behavior that hinders, limits or skews competition in breach of the applicable competition laws. Our products shall be correctly and fairly priced and not aimed at squeezing out our competitors.

Sharing of certain information may be damaging to competition and in breach of competition regulations. We are always cautious in handling information and follow the additional restrictions imposed on what we can share with our colleagues and externally.



How does it affect me?

- Do not share or seek to obtain sensitive information about a business unit outside your area of responsibility. Handle all sensitive information with care.
- Do not engage in cooperation on prices, sharing the market, or cooperation on tenders with our competitors.
- Make sure to read and follow the Competition Handbook for advice.
- Be cautious and seek advice from legal@bama.no when planning new business activities or entry into new markets.

3.9 | WE PROTECT OUR BUSINESS, PROPERTY AND ASSETS AND REPORT ACCURATELY

At BAMA we are truthful in our dealings with one another, our clients and other business partners. We do not engage in unlawful, fraudulent, or deceptive practices to acquire any form of financial benefit.

Fraud refers to an individual's intentional dishonest conduct for the purpose of gaining an unlawful benefit, typically a financial advantage. It involves deceptive practices such as falsifying or concealing information, falsifying documents and signatures and/or misusing funds for personal gain.

We are responsible for safeguarding and appropriately using BAMA's assets. We don't use BAMA's assets for personal purposes without pre-approval.

BAMA's business information will be communicated accurately and fully, both internally and externally. We follow acknowledged accounting principles and register all transactions transparently. Our payments are made against invoices, based on legitimate agreements between BAMA and the relevant supplier or business partner. We classify transactions correctly in the records, and do not try to circumvent internal and external requirements. Our record keeping shall be openly and transparently disclosed to internal or external auditors.



How does it affect me?

- Conduct all your work for BAMA with complete honesty and integrity.
- Follow all relevant processes and procedures for commitments, transactions and payments, in line with your authorized approval levels.
- Protect BAMA's assets, and only use them for legitimate business purposes.

3.10 | WE FOLLOW REGULATIONS ON SANCTIONS AND EXPORT CONTROL

BAMA is committed to complying with applicable national and international sanctions and export control regulations. Sanctions and export control regulations are complex, so if you are involved in a transaction or negotiations with entities or individuals that are subject to such regulations, you should contact Compliance@bama.no or Legal@bama.no for advice.



3.11 | WE ARE COMMITTED TO PREVENT MONEY LAUNDERING AND TAX EVASION

At BAMA we are firmly opposed to all forms of money laundering and tax evasion, and we will comply with all applicable laws. We are committed to doing our utmost to prevent any financial transactions where we are involved from being used for money laundering or tax evasion schemes. We do not tolerate the facilitation of tax evasion or money laundering at BAMA, nor by suppliers, business partners or others acting on our behalf.

Money laundering is the process of disguising the proceeds of crime in order to hide its illegal origins. This is illegal and supports other criminal activities, including drug trafficking, terrorism, corruption, human rights violations and tax evasion. Tax evasion is an illegal practice where a person or entity evades paying their actual tax liability.



How does it affect me?

- Carry out all deals and financial activity with complete transparency and in line with standard processes. All transactions shall be clearly documented in the accounting records.
- Be aware and cautious of any unusual requests related to payments, invoicing and banking arrangements as well as unusual tax status of suppliers and business associates.

3.12 | WE PROTECT AND TREAT OUR INFORMATION CONFIDENTIALLY

It is crucial that our owners, employees, customers, partners, authorities and others have confidence in BAMA's information management. We all have a responsibility to prevent unauthorized access to BAMA's confidential information. We shall also ensure that personal data, e.g. information about identified or identifiable persons, is only processed (collected, used, stored, transferred etc.) for legitimate purposes and in accordance with BAMA's policies on personal data. The information shall be safeguarded by appropriate technical and organizational measures, such as access control, encryption and password protection.

BAMA's information shall always be correctly classified, protected and available for business needs. BAMA's IT infrastructure shall be used for business purposes and never to perform illegal or unethical activities. Personal use of BAMA's IT systems should be kept to a minimum and have no adverse effect on cost, IT security or productivity. Cyber-attacks and malicious activity are a continuous threat, and the use of our IT-solutions and equipment may be monitored to detect such risk.

BAMA's Intellectual Property Rights (IPR) consist of any business ideas or information that BAMA owns, such as brand, unique products and other proprietary information. These values shall be safeguarded and managed in the best interest of BAMA. Similarly, we shall show respect for the corresponding values of others.



How does it affect me?

- Make sure information is correctly classified and only shared with authorized persons, both internally and externally. Avoid talking about confidential BAMA information in places where you may be overheard, such as while traveling or in public places.
- Process personal data only for legitimate purposes and make sure you have a legal basis for the processing. Share data only on a need-to-know basis and in line with relevant safety measures, such as password protection, encryption and anonymization.
- Be aware of cyber-attacks and malicious activity, such as phishing, on BAMA's IT infrastructure, and immediately report any incidents to the IT department.

3.13 | OUR PUBLIC COMMUNICATION IS CONSISTENT AND ISSUED FROM AUTHORIZED REPRESENTATIVES

Open and honest external communication is important to BAMA, and we will communicate in an accurate and consistent manner. Statements on BAMA's behalf shall therefore only be made by authorized representatives.

We all need to exert good judgment when participating in social media or other communication platforms, and make sure that our personal opinions are not perceived as BAMA's opinions.



How does it affect me?

- Do not make statements on BAMA's behalf, unless authorized to do so.
- Be aware of the security risks on social media, and do not share confidential information about BAMA.
- Always be respectful towards colleagues, suppliers, business partners and others on social media platforms.



ALWAYS REMEMBER

If you have any questions on the content or interpretation of this Code, please speak to your Manager or contact the following for guidance:

Compliance@bama.no

Legal@bama.no

HRpost@bama.no

If you have observed or if you are concerned about potential misconduct or any potential breach of this Code, please **SPEAK UP!**

BAMA encourages you to let us know of any problematic issues so that they can be resolved. A case which is reported shall be handled with integrity and professionalism and we will never take or allow retaliatory action against anyone who reports a concern in good faith.

BAMA's SPEAK UP reporting channel:
<https://www.bama.no/om-bama/varsling/>



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