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Bulk Business Partner Code of Conduct

Bulk Infrastructure Group AS



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Bulk Business Partner Code of Conduct

Our Mission and Vision

At Bulk, our mission is to bring sustainable infrastructure to a global audience and to drive positive change through responsible, forward-looking development. We challenge ourselves and our partners to think differently, collaborate openly, and contribute to building a profitable and sustainable value chain that benefits society, our customers, and the environment.

This Business Partner Code of Conduct is grounded in Bulk's core values, including respect, which underpins our expectations to Business Partners' ethical conduct and responsible business practices. We view sustainability not as a trend but as a global race—one we can only win as one committed team with a shared ambition. Our suppliers play a critical role in this effort.

Bulk Infrastructure Holding AS, together with its subsidiaries and affiliated companies (Bulk), has implemented this Business Partner Code of Conduct (the "Code"), which reflects Bulk's core values. The Code is based on internationally recognized principles and standards, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises.

This Code applies to all individuals and entities with which Bulk maintains business relationships, including suppliers, distributors, agents, joint venture partners, customers and strategic partners (the "Business Partners") – regardless of their nature, type of transaction or duration, ownership structure or country of incorporation. We expect our Business Partners to uphold the same standards of environmental responsibility, ethical conduct, and long-term value creation, and to use their best efforts in ensuring that their own business partners adhere to equivalent standards.

Ethical behaviour and compliance with laws and regulations

Our Business Partners are expected to comply with all applicable laws and regulations in their country of origin and in every country where they operate. This includes, but is not limited to, laws governing ethical business practices, anti-corruption laws, fair competition, sanctions and export controls, human rights, data protection, environmental and climate standards, and responsible business conduct.

Health and Safety

Business Partners shall secure a safe and healthy working environment in accordance with internationally accepted standards such as the ILO Conventions on Occupational Health and Safety. Business Partners shall comply with applicable health and safety laws and regulations and work systematically to manage risks and promote a culture of safety.

Anti-Corruption

Business Partners shall uphold the highest standards of business ethics and not engage in any form of corruption, bribery, fraud, facilitation payments, kickbacks or other illegal gratuities.

Any payments made to a government authority in relation to the work for Bulk shall be specifically required by law or regulation, be made against receipt and to a government administrated account.

Gifts, hospitality and conflicts of interests

Business Partners shall avoid any actual or perceived conflict of interest in dealings with Bulk and promptly disclose any such situation.

They shall not offer gifts—directly or indirectly—to Bulk employees, representatives, or their close associates, nor to any third party on Bulk's behalf, unless the gift is modest and the time and place is appropriate. Hospitality may only be offered for a legitimate business purpose and must be reasonable

Money Laundering

Business Partners shall oppose all forms of money laundering, and have adequate systems in place to prevent financial transactions from being used to launder money.

Sanctions and Export Controls

Business Partners must not engage in business or dealings with any sanctioned country, group, organisation, or individual, and are expected to conduct appropriate due diligence when selecting their own suppliers and subcontractors to ensure the same.

Fair Competition

Business Partners are expected to maintain high standards of commercial ethics and compete fairly within the framework of competition rules. This includes not to participate in price fixing, bid rigging, market allocation, or any other practice that undermines fair competition.

Human Rights and Labour Standards

Business Partners are expected to support and respect internationally recognized human rights as set out in the UN Universal Declaration of Human Rights and related conventions. This includes compliance with labor standards established by the International Labour Organization (ILO) Core Conventions, including freedom of association, the right to collective bargaining, and the elimination of forced labor, child labor, and workplace discrimination.

Business Partners are expected to meet the responsibilities outlined in the UN Guiding Principles on Business and Human Rights, taking proactive steps to identify, prevent, and address adverse impacts of their activities. Special attention should be given to vulnerable groups and individuals, and to obtaining free, prior, and informed consent from indigenous communities where relevant.

Forced Labor

Business Partners shall not use forced or involuntary labor. All work must be freely chosen, and workers must be able to leave employment with reasonable notice. We expect our Business Partners to provide a living wage, reasonable working hours, and written employment agreements, and to recognize and respect the right of free association and collective bargaining.

Child Labor

Business Partners shall not employ anyone below the age of 15 or a higher age as applicable in local laws, in which case the higher age shall apply. If individuals under 18 are employed, their best interests must always be the primary consideration. Children shall never be engaged in hazardous work or any activity that could harm their health or physical, mental, spiritual, moral, or social development. All work performed by individuals under 18 must be subject to appropriate risk assessments and regular monitoring of health, working conditions, and hours.

Monitoring human and labor rights

Business Partners may be required to demonstrate how they address actual or potential human rights impacts identified in their due diligence processes, within the bounds of applicable legal restrictions such as competition law, data protection requirements, and legal privilege. This applies both to information about the Business Partner's general due diligence approach and results, and to information concerning specific products or services delivered to Bulk. Our approach is risk based and to collaborate with our suppliers and contractors to improve negative impacts where required.

Respect, Fairness and Inclusion

Business Partners are expected to act with respect, fairness and inclusion in all interactions conducted in the course of their work for, or on behalf of, Bulk. Any form of physical or verbal abuse, threats, intimidation, or harassment is strictly prohibited.

Business Partners are expected to foster a workplace free from discrimination or unfavorable treatment based on race, color, nationality, ethnicity, gender, age, disability, sexual orientation, religion, or belief. Behavior that could be perceived as degrading, hostile, or threatening will not be tolerated.

Environment

Business Partners shall strive to operate in a manner that safeguards the environment and minimizes any negative environmental impact. This includes responsible management of chemicals and hazardous substances.

Business Partners shall protect biodiversity and natural habitats, and are encouraged to set and disclose climate targets, including greenhouse gas emissions reductions.

Personal Data, Privacy and Cybersecurity

Business Partners processing personal data on Bulk's behalf are expected to protect personal data and confidential information in line with applicable legal requirements, and use Bulk's data only for agreed purposes.

We expect Business Partners to implement appropriate cybersecurity risk management measures, including secure access controls, data encryption, vulnerability management, incident handling procedures, and supply chain security. Business Partners providing critical services or digital infrastructure to Bulk should ensure appropriate governance and oversight of cybersecurity risks at management level.

Bulk should be notified promptly of any significant cybersecurity incidents or data breaches affecting our data or systems. Any subcontractors engaged should be subject to equivalent obligations.

Grievance mechanisms

Bulk expects its Business Partners to have grievance mechanisms in place for workers and affected stakeholders. These mechanisms should be accessible, confidential, and allow concerns to be raised without fear of retaliation.

Reporting concerns and breaches

Business Partners are expected to, without undue delay, inform Bulk of any concerns or potential breaches of this Code, and cooperate with Bulk in investigation of the matter.

Reporting of concerns can be made anonymously by email directly to Bulk's Legal and Compliance Department or through Bulk's compliance hotline, available at Bulk's website.

