Supplier and Partner Code of Conduct

DOCUMENT CONTROL	
Owner: Chief Executive Officer	Oversight: Board of Directors
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Approved by: Svein Erik Haugan, CEO	Approval date: 26 November 2026

1. Scope and minimum standards

This Code applies to suppliers, external advisers, subcontractors and agents engaged by TEAM NORSO AS to deliver its services. Relevant partners must comply with applicable law and contractually accept this Code or substantially equivalent obligations. The CEO shall assess equivalence and proportionality for standardised service providers.

2. Integrity, people and environment

Partners shall prohibit bribery, improper gifts, hidden commissions, fraud, tax evasion and facilitation of tax evasion; disclose conflicts; respect human rights, lawful wages, freedom of association, fair treatment and safe working conditions; prohibit forced labour, trafficking and unlawful child labour; address environmental impacts and comply with applicable trade and sanctions restrictions. No candidate may be charged for access to a TEAM NORSO recruitment process.

3. Confidentiality and security

Partners must protect client, candidate and company information; use it only for authorised purposes; implement suitable security; and report incidents promptly. Data processing and onward transfers require the necessary contractual and legal safeguards. Obtain prior written approval from TEAM NORSO before delegating work or engaging additional subcontractors for TEAM NORSO assignments, including any required subprocessor approvals.

4. Due diligence and onward obligations

Before onboarding, assess identity, ownership where relevant, competence, contractual terms, confidentiality, data processing, sanctions and human-rights risks according to the service and risk profile. Record decisions and unresolved risks. Require substantially equivalent obligations in relevant downstream arrangements. Reassess material suppliers at least annually and when risk changes. Apply objective, fair procurement criteria and provide qualified diverse suppliers fair access to opportunities where practicable.

5. Reporting and verification

Partners shall report material breaches or credible concerns promptly to TEAM NORSO and cooperate with proportionate requests for information, evidence or agreed audits. Protect reporters and witnesses against retaliation. TEAM NORSO shall assess notification duties to clients and authorities, subject to law and confidentiality. Audit access shall be scoped to relevant information with appropriate protection for other clients and personal data. Report relevant violations to affected clients promptly, and forward client-related third-party requests where contractually required and legally permitted. Cooperate with lawful customer assessments and remediation, with appropriate notice and scope safeguards.

6. Remediation and governance

The CEO maintains a relevant supplier register and approves risk-based controls. Agree corrective actions and follow up. Serious, unlawful or unremedied breaches may result in suspension or termination under applicable contracts and law. Review this Code annually and following significant changes. Relevant representatives shall read and acknowledge this policy in writing.

Basis: IMS.PO.40, pp. 1, 5–6; related TEAM NORSO policies TN-POL-001 to 010.