

# Code of Ethics for the BCC Federation

#### Introduction

The BCC Federation and its joint initiatives are to conduct their activities in an ethical, responsible, and sound manner, where applicable laws are complied with. All board members, employees, interns and volunteers of the BCC Federation, hereafter referred to as "employees", must make a common effort.

The Code of Ethics specifies the framework for responsible behavior but is not exhaustive in relation to what isconsidered ethical and good behavior. It is a managerial responsibility to raise awareness of the importance of ethical choices and to give guidance in specific situations. Furthermore, it is the individual employee's responsibility to familiarize themselves with the present Code of Ethics, so that each of us acts in accordance with it.

# Compliance

All employees are knowledgeable of and comply with all applicable laws, regulations, international conventions, and with the BCC Federation policies and regulations.

Should an employee be uncertain whether an event or activity is in violation of the regulations, the situation must be clarified in advance with the immediate superior.

In case of breach of the policies and regulations, internal disciplinary measures can be initiated, including dismissal and the bringing of charges, within the framework of the Working Environment Act.

## Integrity and loyalty

All employees shall act with honesty, integrity, and loyalty in all their dealings with other employees or stakeholders. The BCC Federation promotes a working environment that values respect, fairness, and integrity. Loyal employees shall always promote the BCC Federation's values and work for the BCC Federation's best interests. All employees should be aware that the federation can be linked with their behavior in private settings. Being loyal to the BCC Federation also includes safeguarding the federation's reputation through their behavior privately and professionally.

## Protection of assets

All employees shall protect intangible and tangible assets of the BCC Federation and its joint initiatives against damage, theft, abuse, and destruction. Intangible assets refer to assets that are not physical in nature, such as good reputation and image, time, intellectual property including patents, designs and trademarks, and all other non-material assets. Tangible assets refer to assets that are physical in nature, such as buildings, machinery, equipment, and all other material assets.

One of the most valuable assets of the BCC Federation is its good reputation, and employees shall never participate in activities or behavior that may damage it.

All the aforementioned assets may not be used by employees for their own or others' private purposes.



#### Protection of the environment

The BCC Federation is committed to including environmental mindfulness into all its activities and stimulating environmental sustainability. All employees have a responsibility to protect the environment and comply with all applicable environmental laws during their operations.

# Confidentiality

Confidential information of any kind shall not be passed on to unauthorized persons, neither internally nor externally. Confidential information refers to all non-public information that might be harmful to the BCC Federation if disclosed. Every employee shall sign a Confidentiality agreement prior to their first day of work, which also includes a more detailed definition of confidential information.

In the case of a statutory duty to provide information, the responsible manager in the relevant area shall submit the information.

# Health and safety

Health, safety, security, and well-being at work is a crucial matter for the BCC Federation. In their daily activities, all employees must be aware of their personal responsibilities, being attentive to the prevention of accidents and harm to health.

#### Anti-discrimination and anti-harassment

The BCC Federation supports a respectful and inclusive working environment which is free of harassment and discrimination, where each person is treated with courtesy, dignity, and respect, regardless of gender, marital status, sexual orientation, family circumstances, age, disability, nationality, ethnicity or political or religious beliefs.

#### Written agreement

All agreements must be concluded in writing and filed securely. This applies to all agreements of the BCC Federation with employees, suppliers, members, and other partners.

#### Conflict of interest

Employees shall try to avoid situations of conflicts of interest, or of perception of conflicts of interest, and they shall deal with them in a responsible manner if they should appear. A conflict of interest situation arises when the private interests of the employee compete or conflict with the interests of the BCC Federation and its joint initiatives.

Employees who become aware of conflicts of interest should inform their immediate superior about this as soon as possible.

#### Anti-corruption

Employees shall under no circumstances participate in bribery or corruption of any kind.



Courtesy gifts can be exchanged provided they have a minimal economic value. They must fit the circumstances and occur exceptionally. Such gifts should be addressed to the recipient's official work address so that it does not give rise to any suspicion that the recipient wants to keep this hidden from his superior. Employees should never demand, offer, accept or provide cash or gifts that are likely to affect a decision, or as a counter-service to a service.

No employee shall receive, offer or seek to obtain benefits for himself or others who may harm the BCC Federation's interests.

# Anti-money laundering

Employees shall under no circumstances participate in any form of money-laundering, and shall do everything in order to prevent such actions.

The term 'money laundering' refers to schemes that are implemented to ensure that profit gained from a criminal act are integrated into the legal economy.

#### Narcotics and alcohol

Employees should not work in a state where they are affected by alcohol or drugs.

The BCC Federation does not accept the use of drugs.

In connection with representation or corporate events, moderate consumption of alcohol can be served. This should never be combined with illegal driving or other work that is incompatible with alcohol consumption.

#### Warning

Employees who become acquainted with an illegal act or violation of the principles in our ethical guidelines should notify this to their immediate superior in accordance with warning procedures for the individual organization.

If for any reason it is difficult to notify the organization internally, the BCC Secretariat can be notified directly. Contact can be made using the email address: compliance@bcc.no.

#### Whistleblowing

If the warning process is not possible or effective, employees have the possibility to use the whistleblowing process. Our whistleblowing policy exists to help employees speak up in situations where they suspect dangerous, illegal, harmful, or fraudulent activity is taking place, or when someone is being treated unfairly.

#### Non retaliation

No employee will be discharged, demoted, or otherwise discriminated against as a reprisal for reporting any suspicions or for "whistleblowing."



# Implementation and follow-up

The managers are responsible for implementing the ethical guidelines and ensuring that all employees receive sufficient information and an introduction to these. Managers at all levels are responsible for helping to ensure that the ethical guidelines become a relevant and integral part of the organization's strategic assessments, decision-making processes, activities and evaluations. The individual manager is responsible for ensuring that the guidelines are known and followed within their own area of responsibility and must lead by example. The employment contracts and personnel manual should always refer to these guidelines.

Employees shall familiarize themselves with the guidelines and shall participate in training offered by the BCC Federation and its joint initiatives.

The BCC Secretariat is responsible for updating the ethical guidelines.

All employees are responsible for addressing ethical issues that need clarification.

These guidelines were adopted by The Secretariat of the BCC Federation, 7th of September 2021.