

Supplier Code of Conduct

Bergen Engines operates under a firm commitment to act responsibly, be ethical in business conduct, and be in compliance with relevant laws and regulations, including the Norwegian Transparency Act (Åpenhetsloven). We uphold a zero-tolerance policy toward corruption, modern slavery, and child labour, and we require our suppliers to share these principles. By doing so, we strengthen our global supply chain and help ensure that our relationships benefit both society and the environment.

This Supplier Code of Conduct applies to all suppliers, subcontractors, agents, contractors, intermediaries, and joint-venture partners acting on behalf of Bergen Engines. We require suppliers to communicate these standards throughout their own supply chain. Any uncertainties regarding interpretation or application of the SCoC should be addressed to their designated Bergen Engines representative or in the absence of a designated representative, the Compliance Manager, Bergen Engines.

COMPLIANCE WITH LAWS AND REGULATIONS

All suppliers must comply with applicable local, national, and international laws, including those governing labour conditions, anti-corruption, competition, health and safety, and environmental protection. Suppliers involved in operations linked to Norway are expected to support Bergen Engines in meeting its obligations under the Norwegian Transparency Act and EU Taxonomy regulations by providing relevant information and documentation upon request. Furthermore, suppliers are encouraged to align their operations with internationally recognized guidelines, such as the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the core conventions of the International Labour Organization (ILO).

Under no circumstances should child labor be practiced; the minimum legal working age and any higher standards imposed by local law must be strictly observed. Workers must receive fair remuneration that meets or exceeds local legal minimum wage requirements, and overtime should be voluntary and appropriately compensated. Suppliers are expected to maintain safe and healthy working environments, adopting all necessary measures to prevent workplace injuries or illnesses. Equally important is the assurance of non-discrimination and respect for diversity. Discriminatory behaviors or practices based on race, gender, religion, disability, sexual orientation, or other protected characteristics are not tolerated. We further recognize the right of workers to associate freely, organize, and bargain collectively in accordance with applicable laws.

HUMAN RIGHTS AND FAIR LABOUR PRACTICES

Bergen Engines expects suppliers to respect and protect fundamental human rights in their daily operations. Employment must be freely chosen, with no use of forced, bonded, or involuntary labour.

ENVIRONMENTAL RESPONSIBILITY

We view environmental stewardship as a shared responsibility and expect our suppliers to adopt strategies that reduce their ecological footprint.

Suppliers should take steps to minimize greenhouse gas emissions, manage resources efficiently, and prevent pollution or hazardous waste from damaging the surrounding communities. We encourage efforts to obtain recognized environmental certifications as these certifications reflect a commitment to continuous improvement and responsible use of natural resources.

RESPONSIBLE BUSINESS CONDUCT

Bergen Engines demands the highest standard of integrity in all business dealings. Suppliers must operate free from corruption, bribery, and fraud, and adhere to any applicable anti-corruption legislation. Conflicts of interest that could compromise ethical decision-making must be avoided or transparently disclosed. We also prohibit the facilitation of tax evasion or money laundering; any financial transactions should reflect genuine commercial arrangements, and invoices or contractual documents must be accurate and truthful. Furthermore, suppliers are required to comply with fair competition (antitrust) laws and refrain from engaging in collusive or anti-competitive practices. In interactions with governments, agencies, or political entities, suppliers must conduct themselves in a lawful, transparent manner. Any lobbying or political activities related to Bergen Engines must be carried out with integrity and respect for all legal requirements.

DATA PRIVACY AND CONFIDENTIAL INFORMATION

Safeguarding data and proprietary information is crucial to maintaining trust in our business relationships. Suppliers handling personal or confidential data must comply with relevant data protection regulations, such as the EU General Data Protection Regulation (GDPR), and ensure that adequate controls and processes are in place to prevent unauthorized access or disclosure. Information that belongs to Bergen Engines, including trade secrets and other sensitive data, must be used solely for authorized purposes and should never be shared externally without prior approval. If a breach or suspected misuse of data occurs, it must be reported promptly and handled according to applicable regulations and contractual obligations.

TRADE COMPLIANCE AND COLLABORATION

Suppliers are expected to adhere to all applicable export controls, customs regulations, and any sanctions programs relevant to their operations. This includes securing proper licenses or permits for controlled goods or technologies and diligently screening transactions to avoid violating embargoes or sanctions. Should any issue arise that may affect ongoing deliveries or legal compliance, suppliers must engage in open and timely communication with Bergen Engines to seek mutually acceptable solutions.

MONITORING, AUDITS, AND CORRECTIVE ACTIONS

In order to verify compliance with this SCoC, Bergen Engines may conduct announced or unannounced audits of supplier facilities, processes, and documentation. Suppliers are required to cooperate fully and grant access to relevant personnel and records. Any breach of this SCoC or legal requirements should be addressed swiftly through an appropriate corrective action plan, with implementation typically expected within a defined timeframe. Suppliers must also assist Bergen Engines in fulfilling information requests, including those arising under the Norwegian Transparency Act, by providing documentation related to their due diligence processes, supply chain risks, and actions taken to remedy issues.

CONSEQUENCES OF NON-COMPLIANCE

When instances of non-compliance are identified, Bergen Engines may request suppliers to take prompt corrective measures. Continuous or severe violations, such as persistent refusal to address serious issues or involvement in activities prohibited by law, may result in the suspension or termination of the business relationship. Bergen Engines reserves the right to take immediate action, including contract termination, if unethical or illegal conduct is discovered that poses material risks to the company or its stakeholders.

ACCEPTANCE AND ACKNOWLEDGMENT

By engaging in business with Bergen Engines, suppliers affirm that they understand and will uphold the expectations laid out in this Supplier Code of Conduct. We encourage suppliers to cultivate a culture of accountability and transparency,

addressing any queries or concerns in partnership with Bergen Engines. Through our collective efforts, we can foster a more sustainable, ethical, and equitable supply chain that delivers shared value for businesses and communities alike.

By:

(Print Name)

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(Signature)

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(Title / Company)

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(Date)