

CODE OF CONDUCT				SED no.:	35.03
				Rev.:	1
Prepared by:	JRO	Checked by:	TJ	Date:	29.10.2018
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## Purpose

The purpose of this Code of Conduct (hereafter referred to as The Code) is to set out the requirements that all Suppliers of goods and services to Stavanger Engineering must agree to and accept in order to comply with us.

Where reference is made to ‘Supplier’ this includes all Subcontractors working on behalf of the Supplier. It is the responsibility of the Supplier to ensure that the ‘Stavanger Engineering Code of Conduct’ is understood and accepted by Subcontractors working for Stavanger Engineering in order for compliance.

This will enable us to achieve safe, effective, trouble-free operations.

## Stavanger Engineering Core Values

At Stavanger Engineering, we believe in operating the Stavanger Engineering Way:

- We shall keep a customer focus in all aspects of our work.
- Our design values are: Innovation – simplicity – safety.
- Our organization shall be the best possible specialist environment.
- We shall maintain a strong ethics throughout our organization and operation.

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Stavanger Engineering is committed to conducting our business in an ethical, legal and socially responsible way. We have five Core Values which guide our business approach and culture, these are:

### **Health**

- We care about the wellbeing of our employees. Therefore, we aim to create a healthy work environment, both physically and mentally, with a good work life balance responding to the individual needs of our employees.

### **Safety**

- We are committed to make safety our absolute first priority. We will continuously work on strengthening our safety culture; while having strong focus on management's commitment to lead by example and on the safety behaviour of all employees.
- We believe that incidents can be prevented by approaching work and our design process proactively, making safety everyone's responsibility and by sharing knowledge and inspiring each other to find safer work practices and safe products.

### **Security**

- We will in order to protect our employees and our assets; constantly improve our preparedness to handle any foreseeable emergency situation, thus ensure the safety of our employees and minimize potential damages.

### **Environment**

- We will in our business activities strive to avoid harmful environmental impact and design environmentally friendly products, while we contribute to sustainable development through sensible resource utilization, recycling and protection of the environment.
- We are committed to minimize influence on the external environment, works actively to meet established environmental goals based on identified environmental risks and aspects for our activities

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## Quality

- We have a strong focus to deliver quality and reliability in solutions that meet our customer's expectations. Therefore, we constantly focus on improving our quality performance, reducing cost of poor quality and potential project risks and increasing the number of improvements. By these actions, our aim is to strengthen our customer satisfaction.
- We promote a culture that continually improves our quality performance and our quality management system. We set ambitious objectives and targets for ourselves to progressively achieve a performance that we can be proud of and which adds value for us and all our stakeholders.
- Stavanger Engineering expects suppliers to maintain a culture where their employees are able to raise concerns and report
- breaches of laws, regulations and this Code of Conduct. Suppliers must have appropriate 'whistleblowing' procedures in place and communicated, so that their employees can report their concerns confidentially and without fear of retaliation. If suppliers have concerns or complaints about conduct of Stavanger Engineering staff, they must report them.

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### Health and Safety

- Safety is Stavanger Engineering's top priority and we are committed to achieving safe, effective, trouble free performance of our projects.
- Suppliers must provide a safe, healthy and secure working environment for their employees.
- Standards, policies, procedures, conditions and equipment must be in place to manage operations to minimize incidents and accidents and to promote the general health and well-being of employees.
- Suppliers must comply with all local and country laws and regulations pertaining to health and safety.

### Valuing all People

- Stavanger Engineering is committed to ensuring that all people are treated fairly and with respect.
- Suppliers must support and respect the protection of human rights and ensure the personal dignity, privacy and legal rights of each employee.
- Suppliers must ensure fair labour conditions, conform to applicable employment law, comply with all applicable child labour laws and regulations and in particular must not employ any person below the legal minimum age. Suppliers must not employ, engage or use forced labour or trafficked labour; nor engage in or condone abusive or inhumane treatment of workers.
- Suppliers must refrain from employment discrimination based on gender, colour, ethnicity, religion, disability, union membership, political affiliation or sexual orientation.
- Suppliers shall recognise and respect the right of employees to freedom of association and collective bargaining.

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- Suppliers shall compensate employees fairly and follow local laws and regulations regarding minimum wages and benefits. Suppliers must pay their employees promptly and regularly and be fair in respect of work performance. Working time periods must not exceed the legal limit, should include at least one uninterrupted day off per week and employees should be granted annual, sick and any other leave entitlements.
- All work performed must be following national laws and practices.

### **Performance Improvement**

- Stavanger Engineering is a learning company which encourages the capture of knowledge and ideas to improve performance. Suppliers should be open to review performance in their area and evaluate ways in which improvements can be made. High standards of technical integrity should be a primary focus allowing world class service to be delivered.
- Suppliers are responsible for communicating the requirements of the Code to their employees, and the Code should be made freely available to employees in their local language and in a readily accessible place.

### **Environmental Stewardship**

- Stavanger Engineering is committed to minimising the environmental impact of our operations.
- All suppliers shall as a minimum comply with all applicable national and local environmental legislation and regulations.
- Suppliers shall show due regard and respect for the social and physical environment in which they operate including a commitment to reducing energy usage and waste, and the responsible management of dangerous or hazardous materials

### **Business Integrity**

#### ***Compliance with applicable laws, regulations and standards***

- Suppliers must know, understand and fully comply with all applicable national and international laws and regulations when contracting with and delivering work for Stavanger Engineering.
- Where compliance with industry standards is required, suppliers must ensure that they have sufficient procedures and controls in place to maintain compliance

#### ***Commercial discipline***

- Suppliers must avoid conflicts of interest, and ensure that all business with Stavanger Engineering is conducted in an honest and fair manner
- Engagement with Stavanger Engineering on commercial matters must only be conducted with the involvement of an authorised purchasing or contracts representative within the Stavanger Engineering

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- Suppliers must not accept informal or verbal orders from Stavanger Engineering employees. Contracts and purchase orders should only be accepted on a valid Stavanger Engineering purchase order
- All invoices submitted to Stavanger Engineering for payment must reference the relevant purchase order number. Failing to do so will result in the invoice being rejected for payment processing. Where a purchase order is not required, the Supplier must provide the details of the Stavanger Engineering initiator and the contract number, where a valid contract is in place.
- Invoices submitted shall correspond to the line items as specified on the purchase order and not any other instructions received.

#### ***Anti-bribery and anti-corruption***

- Suppliers must never take part in any form of bribery, corruption or improper payments of any kind and should have a programme in place to prevent and detect fraud, bribery and corrupt business practices. Suppliers must comply applicable anti-bribery laws, including but not limited to the
  - OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
  - The European Council treaty no. 173; Criminal Law on Corruption
  - The European Council treaty no. 174; Civil Law Convention on Corruption,

and other laws appropriate to the countries where you perform work for Stavanger Engineering.

- Suppliers must not make any facilitation or 'grease' payments, and must prohibit your suppliers and subcontractors from doing the same.
- Suppliers must not give, offer or promise gifts or favours to Stavanger Engineering employees that are, or may be seen as, either inappropriate or an attempt to influence business decisions.
- Suppliers must not give, offer or promise any money, gift, hospitality, or other advantage to any person carrying out a business or public role, or to a third party associated with that person, in order to influence them to do something improper or influence them to their business advantage.
- Suppliers must not use intermediaries or contractors for the purpose of committing acts of bribery.
- Suppliers must not employ government officials, or allow government officials to have a direct, or indirect interest in their company or in the proceeds of a contract with Stavanger Engineering.
- Suppliers must conduct appropriate risk-based due diligence on all subcontractors, and ensure they agree to comply with anti-bribery and anti-corruption obligations and undertakings equivalent to those they are contracted to comply with.

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- Suppliers must inform Stavanger Engineering promptly if they become aware of bribery or corruption, including facilitation payments, in relation to their work for Stavanger Engineering;
- Suppliers must maintain adequate books, records, accounts and supporting information to clearly explain the transactions they have entered into whilst working for Stavanger Engineering, and to demonstrate that they are compliant with the above requirements.
- Stavanger Engineering reserves the right to check adherence to the requirements of The Code and to conduct compliance audits from time to time. Suppliers shall keep proper records to demonstrate compliance with The Code and required laws. When requested, Suppliers will provide the necessary access to data and documentation for our representatives to verify compliance with The Code.
- Suppliers must maintain sufficient internal controls, policies, and procedures to ensure compliance with the above expectations.

#### **Confidentiality**

- Suppliers who have access to commercially sensitive information provided by Stavanger Engineering must operate with due discretion, and should not disclose this information to any third parties or seek to benefit from it through financial dealings or other activities.

#### **Sustainable Growth**

- Suppliers should be committed to maintaining trust through delivering operational and engineering excellence.
- Financial discipline is encouraged to promote profitable, long term growth. Stavanger Engineering puts this at the forefront of operating our business efficiently and we expect our Suppliers to operate in the same manner.



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Tomas Johnsen  
General Manager

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**Supplier**.....

**Signature** .....

**Block letter**.....

**Date**.....