

NG

Norsk
Gjenvinning



Code of conduct for employees of the Norsk Gjenvinning Group



[NB! Please note that this document is a translation of the Norwegian Code of Conduct only. The document shall in any event be supplemented and understood on the basis of the relevant country's legislation applicable for the relevant company.]

NG's Code of Conduct

Norsk Gjenvinning Group's ambition is to be the leading player in compliance and sustainability in the industry. This means that we have high standards for health and safety, protection of the environment and ethical behaviour. The code of conduct is built on NG's values and the laws and regulations applicable to our business. The code of conduct describes how to act in an ethical and socially responsible manner.

Red and green traffic lights

We have chosen to use red and green traffic lights to illustrate situations where you should especially be aware and think. It is not intended that you should take all of what is listed under the "red lights" in The Code of Conduct literally. The red lights are intended as a warning that should make you stop and think when you get into the situations described.



In other words - you are allowed to «use your head» and it is a management responsibility at all levels to ensure that The Code of Conduct is not misunderstood leading to operations being paralysed, while at the same time making sure we are clear on what is acceptable and what is not.

We are aware that there is a need for considerable training and discussion relating to The Code of Conduct for various areas. Therefore, remember that you can contact the compliance team and book training in The Code of Conduct in general, or specific procedures and legal issues. Furthermore, training related to The Code of Conduct is part of the compulsory training for our managers and officials.

Kind regards

Ingrid Bjørdal
Chief Compliance Officer

Revised June 2020



Contents

1. General	4
2. Your responsibility.....	4
3. Notification.....	4
4. Employee's duty of loyalty	5
5. Responsibility for implementation, training and checks.....	5
6. Health, Safety and Environment (HSE).....	6
7. Protecting the external environment.....	7
8. Personal conduct.....	8
9. Human and labour rights.....	10
10. Healthy competition.....	11
11. Conflicts of interest	12
12. Downstream control.....	13
13. Protection of NG's property and assets	14
14. Corruption, money laundering, fraud and other forms of financial crime	15
15. Gifts and hospitality	16
16. Privacy and document management	17
17. Passwords and information security - PC and mobile phone	18
18. Communication and contact with media	19
19. Use of the internet and social media	20



1. General

References to «NG» in this document apply to the entire Norsk Gjenvinning Group, including all subsidiaries in which NG is the majority owner.

References to «employees» in this document apply to all employees in the Norsk Gjenvinning Group, including all subsidiaries in which NG is the majority owner. These rules also apply to any temporary workers and contracted personnel.

2. Your responsibility

You shall comply with applicable laws, regulations and internal policies. You should never be an accessory to other people breaking the law.

It is expected that you know the rules and it is your personal responsibility to comply with them. Violation of the rules will be regarded as a breach of company loyalty and may have consequences for your employment situation/work contract.

As an employee of NG, you shall sign to confirm that you have received, read and understood The Code of Conduct.

Please contact your manager if you are unsure of the rules. The group lawyers and Compliance Department centrally can also assist with the interpretation.

3. Notification

If you hear of or see any illegal acts or breaches of NG's Code of Conduct, you shall notify your immediate manager either verbally or in writing. If you feel it is difficult to notify your immediate manager, please contact the Director of Organisational Development and Compliance (the Chief Compliance Officer) who is independent of the line organisation and reports directly to the CEO or the board when required.

Notification can be given openly or anonymously. All notifications shall nevertheless be treated confidential and the notifying employee shall be protected in accordance with Norwegian law.

All notifications of unlawful activities or breaches of NG's rules will be taken seriously and properly investigated. NG will not accept any reprisals against whistle-blowers who have in good faith warned of irregularities, suspected irregularities or other breaches of NG's rules.

Information about secure notification and NG's whistle blowing function is available to employees via the intranet and website: <http://www.nggroup.no/varsling/>

The Director of Organisational Development and Compliance can also be contacted by email varsling@ngn.no or mobile +47 971 96 907.





4. Employee's duty of loyalty

Working life involves a fundamental duty of loyalty from employees. This means that employees shall behave in accordance with the employer's interests. All workers have a duty to be loyal to the company, customers, colleagues, managers, etc.

Examples of disloyalty are; making statements that damage the business, behaving badly towards customers, colleagues, managers or others.

Whether an act or statement violates the duty of loyalty shall be specifically assessed case by case. A breach of the duty of loyalty can be a justifiable cause for dismissal or summary dismissal.

5. Responsibility for implementation, training and checks

Responsibility for implementing The Code of Conduct in each division/company lies with the Divisional Director/CEO. The rules shall be distributed to all employees as well as contractors and subcontractors that who act or carry out work on NG's behalf. The Code of Conduct shall be attached to contracts of employment and shall be mentioned in the contracts of employment and staff handbook.

Line managers are responsible for promoting the understanding and use of the rules and ensuring compliance. The central and divisional support staff are responsible for preparing relevant support materials and assisting with training and awareness.

The status of NG's activities relating to The Code of Conduct will be reported annually to the board.

The rules are published on NG's intranet, in the control system NG-Pro and on the group's web page.



6. Health, Safety and Environment (HSE)

In NG we have a zero vision for accidents and injuries. This means that all our employees or other persons involved in our operations shall arrive home safely from work. Therefore, we actively work on building a safety culture in the Group. All managers are responsible for ensuring that the work is organised in a way so that it protects the lives and health of the employees.

It is a requirement that you as an employee yourself helps to improve safety.

- Notify your immediate manager/safety representative in the event of any suspected divergence from the law and internal regulations, incl. accidents, near misses and factors that may have negative consequences for employee health and safety.
- Use the required protective and safety equipment, and ensure that this is in a valid condition.
- Actively participate in training and mandatory drills.
- Follow the procedures and instructions laid down for individual work operations, including for the use of machinery and equipment. This applies both in our facilities and at customers.

Risk assessments

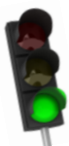
In order to safeguard the health, safety and environment of employees at work, we shall identify hazards and other adverse events. We shall assess risk, identify mitigating measures and develop plans for implementation. Managers are responsible for carrying out risk assessments and shall do so together with safety representatives and employees with experience from the work area in question.

Safe Job Analysis (SJA)

The responsible manager shall ensure that the Safe Job Analysis (SJA) is implemented for tasks that shall be performed for the first time or for work not covered by existing procedures or risk assessments.

Driving and rest period rules

Both employed and any contracted drivers shall follow traffic laws, driving and rest time rules, regulations on working hours in road transport and internal regulations, including «Sjåførhåndboken» («Drivers Manual»).



DO:

- Ensure that you handle waste, vehicles, equipment, machines, etc. correctly and safely
- Use the personal protective equipment required for the task you are performing, and ensure that contractors and external parties also uses this when carrying out work with us
- Be aware of the risks around you and your colleagues when carrying out work
- Intervene in situations where you think there is a risk of harm to people
- Immediately notify your manager/safety representative of any situation that could potentially harm people or other valuable assets
- Familiarise yourself with evacuation routes, meeting places, fire fighting equipment and first aid kits in your workplace.
- Follow NG's instructions for fire, emergencies, notification and reporting
- Respect NG's neighbours and customers



DO NOT:

- Do not perform tasks for which you are not trained, qualified, medically fit enough to do, or sufficiently rested for
- Do not stay in production premises or at facilities outside of working hours unless previously agreed with management
- Do not take unnecessary risks!



7. Protecting the external environment

In NG, we continually strive to reduce our environmental impact and our operations shall not cause environmentally unacceptable burdens in the form of emissions to air, soil or water. Working with environmental impact shall be an integral part of business operations in the group and the work should be given equal status to other responsibilities for the managers.

Permission from environmental authorities

Necessary permissions from the environmental authorities shall be obtained before an activity starts up. The facility manager/operations manager shall on an annual basis evaluate the conformity between their permit(s) and activity at the facility in order to ensure compliance.

Environmental risk

In order to minimise the environmental impact of our business, we shall identify hazards and other adverse events that may have negative environmental consequences. We shall evaluate environmental risk, identify mitigating measures and develop plans for implementation of measures. Managers are responsible for ensuring that the mapping of environmental risks and unacceptable risks is followed up.

You can help us reduce our environmental impact:

- Notify your immediate manager/safety representative of any suspected divergence from the law and internal regulations, incl. accidents, near misses and factors that may have negative consequences for the external environment.
- Actively participate in training and mandatory drills
- Follow the procedures and instructions laid down for individual work operations and for the use of machinery and equipment. This applies both in our facilities and at customers.
- Notify your immediate manager or use NG-Pro if you have suggestions for how your work tasks can be better organised in order to reduce our environmental impact
- Be aware of the impact your activity has on the local community and recipients in your vicinity
- Make sure that measures regarding extinguishing water is part of the local contingency plan for fire



DO:

- Take the initiative in situations and report circumstances which may have negative consequences for the external environment
- Stop work and notify your immediate manager where there is an immediate risk of damage to the external environment
- Follow NG's instructions for fire, acute contamination, preparedness, notification and reporting



DO NOT:

- Do not perform tasks that you are not trained for or are not competent to do
- Do not perform activities that go against licenses, regulations and internal requirements



8. Personal conduct

You shall act with respect and consideration for others, as well as live up to our values of business acumen, proactiveness, responsibility and team spirit. You shall not act in a manner that could be perceived as being discrimination or harassment. This applies both internally and as a representative of NG externally. You shall never be under the influence of drugs or alcohol during working hours, or abuse drugs or alcohol privately in a manner that is detrimental to your work.

Discrimination and harassment

NG wants a diverse and inclusive work culture. NG does not tolerate discrimination or harassment in the workplace. NG does not tolerate harassment in the workplace, i.e. any act, conduct or behaviour that an individual person or a group finds humiliating, intimidating or violent. This applies to all employees, and managers have a distinct responsibility to act as good role models and comply with NG's values and The Code of Conduct.

Harassment or discrimination based on gender, sexual orientation, skin colour, political opinion, nationality, age and/or disability, ethnicity or religion is not accepted.

You should pay particular attention to actions or behaviour that may be acceptable in one culture but not in another.

Office hours and records

When recording working hours, overtime and reimbursements of travel expenses and other expenses, this shall be done correctly and precisely. NG's payroll system shall always be used.

Overtime shall only be performed with the approval of your manager.

Drug and alcohol abuse

NG strives for a safe working environment for our employees. The use of alcohol and drugs increases the risk of serious incidents. The following is required of you as an employee:

- You shall not report for work under the influence of alcohol, drugs or other types of intoxicants. This includes smelling of alcohol and being hungover
- Abuse of drugs and medicines outside working hours is not accepted if this conflicts with the job
- Any use, possession, sale or distribution of illegal substances/medication is prohibited
- If you are on medicines that can have intoxicating effects and which are prescribed by a doctor, your immediate manager shall be briefed on the use so that any work-related precautions can be taken

In situations that give cause for concern, either in the workplace or after accidents/near misses, NG may require an employee to undergo a medical examination, including blood tests, to test for the use of intoxicants. Se www.akan.no and the Working Environment Act for guidance. If there is reason to believe that drugs or alcohol have been brought into the workplace, a search may be conducted. The search can also include personal effects, desks, cabinets, etc.

Limited amounts of alcohol may be served by the employer on special occasions with the approval of the management. This is conditional on its consumption not being combined with the operation of machinery, vehicles or other activities that are not compatible with the consumption of alcohol.

In a professional setting, consumption of alcohol should be limited, in order to make sure one acts responsibly and represents the company in a satisfying manner, as well as safeguarding HSE.



Purchase of sexual services

You shall not purchase or procure sexual services during working hours or on a business trip. The purchase or procurement of sexual services is illegal in Norway and for Norwegians who are on business trips abroad.



DO:

- Respect the culture, gender, sexual orientation, skin colour, political opinion, nationality, age, disability, ethnicity or religion of others
- Be a good team player
- Report fit for work and ready to perform your assigned duties
- Inform your manager about any substance abuse problems and about any medical treatment you are receiving for addiction. Management shall treat such information as confidential
- If you have a substance abuse or other addiction problem, contact the AKAN representative if the business has one, or the Occupational Health Service
- Record working hours, etc. correctly and precisely



DO NOT:

- Do not speak disparagingly of others
- Do not talk behind people's backs
- Do not act in a harassing manner
- Do not hang up pornographic material in the workplace
- Do not make inappropriate jokes or comments
- Do not work overtime unless this is agreed with the manager beforehand
- Do not use, keep, sell or procure any illegal substances
- Do not abuse illegal substances or other medicines
- Do not consume alcohol during working hours unless permission has been given for a special occasion
- Do not ignore cases of substance abuse you see among your colleagues



9. Human and labour rights

NG supports Global Compact Norway and the UN Global Compact's ten principles as part of our internal rules.

Human and labour rights

Through our presence and trade in Europe and Asia we expose ourselves to problems connected with human and labour rights, either directly through our own activities or indirectly through our value chain and throughout the entire product/waste life cycle. NG prohibits all forms of forced labour, child labour and discrimination in our own operations and in our value chain and throughout the entire product/waste life cycle. All employees, contractors and subcontractors who act or perform work on NG's behalf, shall be treated with respect, given decent working conditions and have equal opportunities to develop themselves.

The group recognises the freedom of association and the right to collective bargaining. Health and safety are priority areas within our business and in the value chain. Violations of human and labour rights shall not occur.

Employee representatives on the board are chosen freely by the employees.

Social dumping

Managers in the group are responsible for ensuring that contract workers have the same terms and conditions as group employees (the equal treatment principle in the Working Environment Act). Furthermore, managers shall strive to ensure that employees of our subcontractors have decent working conditions and that the group does not participate in or contribute to social dumping. If a collective agreement is made applicable for all business within an area with regard to wages and other conditions (*Nw.: allmenngjort*), managers shall ensure that our subcontractors are informed of this and ensure that sub-contractors also comply with the instruction. Managers must be proactive regarding the contractual obligation of joint and several liability towards subcontractors.



DO:

- Know your customers and suppliers
- Carry out pre-assessment of customers and suppliers when required by NG's internal rules
- Limit the number of links in the supply chain
- React if an offer is "too good to be true"



DO NOT:

- Do not use subcontractors or principals who cannot document decent working conditions and acceptable wages for their employees
- Do not pay contract workers less than an employee of NG with the same position, experience and expertise



10. Healthy competition

NG has zero tolerance for acts that violate competition rules. You shall behave in a manner that promotes healthy competition, to the benefit of our customers and for the business. Neither employees or others acting on behalf of NG may act contrary to the competition regulations applicable at that time.

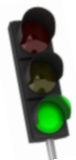
Procedures with guidelines can be found in NG-Pro: *Retningslinjer for etterlevelse av konkurranselovgivningen (Guidelines for compliance with competition legislation)*.

The legislation prohibits a number of activities such as price fixing, bid rigging and market sharing. You shall therefore monitor that suppliers and customers are not engaging in anti-competition activities that could harm our business.

If you are involved in purchasing, bidding processes, upstream/downstream sales, logistics/transport, customer service and marketing, you shall ensure you are familiar with the applicable legislation and internal rules.

You shall never share information about prices and other trade secrets with NG's competitors. You shall never discuss a specific bid with NG's competitors. Exceptions to this may be the clarification of the grounds for cooperation or purchase/sale of subsidiary services.

All agreements with competitors shall be in writing and quality assured by a group lawyer. As a general rule, all agreements with customers shall be in writing and entered into at arm's length. Exemptions from the requirement for written agreements shall be documented and especially justified. The requirement for written agreements does not apply to one-time jobs for less than NOK 20,000.



DO:

- Consult a group lawyer if you have doubts about competition law in general or if you need assistance in specific situations
- Ensure that contracts are agreed in writing unless the written requirement is waived
- Ensure that prices are set by NG alone
- Ensure that decisions to submit/not submit bids are made by NG alone
- Ensure that decisions concerning geographic coverage are taken by NG alone
- Ensure you have a valid reason for every conversation with a competitor, supplier or partner



DO NOT:

- Do not share calculations or pricing information with a competitor unless the competitor is also your customer or supplier. In such cases, only discuss the terms and conditions that apply to the specific transaction
- Do not enter into an agreement or share information with a competitor about customers or geographic market sharing
- Do not discuss with competitors which suppliers, customers or partners NG will or will not do business with
- Do not discuss matters relating to a bid with competitors



11. Conflicts of interest

You shall be loyal to NG and avoid conflicts of interest with your own and close associates' business activities.

NG respects your right to privacy. However, your personal or family relationships may create an actual or potential conflict with your duty of loyalty to NG. This could also apply to a close relation or a relationship with another employee at NG.

A manager shall not enter into an employment agreement with someone in their family or other person they have a close relationship with. As a rule, one shall not be the manager of a person in their family or a person with which they have a close personal relationship with.

A manager who is or is about to enter into a romantic relationship with another employee in the group shall promptly notify their immediate manager about this.

If you, your family or friends, own or operate (directly or indirectly) a company that is a potential customer, supplier or competitor of NG, you shall always inform your manager of this in writing.

Additional employment and directorships as well as ownership in competing companies

You can not have additional employments, directorships, conduct business or have other obligations that may lead to conflicts of loyalty or affect your work in the group. All types of obligations as mentioned above, shall be approved in advance in writing by your immediate manager. Any refusal shall have justifiable cause.

You can also not have a direct investment, or otherwise have an interest in a business which shall be assumed to be in conflict with the group's interests, without the prior written approval of your immediate manager.

Trade with family and/or friends

The trading of NG's goods or services shall be conducted at "arm's length" and trade between an employee and family or friends shall therefore as a rule not take place. In cases where this is deemed necessary and in the interest of NG, it shall be approved by your manager's manager. The job shall be recorded and handled as an ordinary assignment.

Employees shall only be given a discount in accordance with the group's guidelines for this.



DO:

- Report potential conflicts of interest to your manager
- Ask yourself the question, would I feel comfortable explaining this to my manager or my colleagues?
- Job offers from one of NG's customers, suppliers, competitors etc. constitute a potential conflict of interest and shall be reported to your manager immediately so that NG may consider whether it will involve a conflict of interest if you accept



DO NOT:

- Do not give a discount on NG's goods or services to family and friends without your manager having approved this



12. Downstream control

If you are involved in trading, downstream purchasing/sales and other sales-related tasks, you shall make sure that our commodities are managed in accordance with the provisions of the law and NG's internal rules. The following describes the rules that apply to employees who work with downstream solutions in the group.

NG does not accept trade with downstream customers or sub-contractors who do not have the necessary permits or who are in violation of human and labour rights.

NG only accepts trade with previously cleared traders and/or agents. NG refuses to trade with partners who cannot disclose and provide documentation for how the waste is handled and who the definitive end customer is.



DO:

- Ensure you have the necessary knowledge of which regulations apply to the type of waste in question
- Consult your colleagues or a group lawyer if you have doubts
- Follow NG's internal rules for the selection of partners outside of the Nordic region and ensure a satisfactory contract for using such a partner
- Ensure that documentation is obtained regarding the partner being authorised to receive the goods/waste
- Ensure that you comply with all the documentation requirements of the regulations
- Know your customers and suppliers - who they are, what they do, where they are located and how they will use NG's goods or services



DO NOT:

- Do not maintain or use a sales channel if you have any doubts about its legality - consult the group lawyer or Compliance
- Do not let a shortage of time be an excuse for not checking a sales channel's permits, etc.
- Never take short cuts that run counter to the rules in order to increase earnings



13. Protection of NG's property and assets

You shall act responsibly and with care in order to protect NG's buildings, machinery, vehicles, equipment and other assets against misuse, theft, damage or destruction. This also applies to the property of customers and third parties.

You are not allowed to remove NG's assets from the workplace without the consent of your supervisor. Private loans of vehicles, equipment, tools, etc. shall always be agreed in advance in writing. Use of NG's diesel card for private use or the draining of fuel from scrapped cars for private use shall not happen. The use of NG's assets for private purposes may trigger a benefit taxation liability.

It is not allowed for employees to enter facilities outside of working hours, or to bring outsiders into a NG's facility unless this has been clarified with the manager responsible.



DO:

- Request permission from management before using NG's vehicles or equipment privately
- Treat NG's assets as if they are your own



DO NOT:

- Avoid the waste, loss, damage or misappropriation of NG's assets
- Do not buy or sell NG's assets unless you have written authority to do so



14. Corruption, money laundering, fraud and other forms of financial crime

NG has zero tolerance for acts of corruption, and requires all employees to comply with applicable anti-corruption legislation.

Procedures with guidelines can be found in NG-Pro: *Prosedyre for forebygging av korrupsjon i NG-konsernet (Procedure for the prevention of corruption in the NG Group)*.

You shall never accept or offer financial benefits (*Nw. smøring*) (typical bribery) or other unfair advantage by virtue of your employment with NG, for example cash, objects, travel, lodging, discounts or other services that have the purpose of influencing someone to gain an advantage.

The boundaries of what is acceptable, are made clear in NG's *Prosedyre for forebygging av korrupsjon i NG-konsernet (Procedure for prevention of corruption in the NG group)*. A breach of the corruption rules may lead to NG being fined and/or individuals may be fined or imprisoned. In addition, NG may be excluded from tendering.

You shall also ensure that our agents and other partners you are in contact with understand NG's position, and do not accept or offer illegal payments on our behalf. Third parties engaged by NG shall follow the same guidelines that apply to employees of NG. The procedure for partners outside of the Nordic region can be found in NG-Pro: *Prosedyre for valg av samarbeidspartnere utenfor Norden, samt sikring av tilfredsstillende kontrakt (Procedure for the selection of partners outside the Nordic region, and ensuring a satisfactory contract)*.

You are not allowed to take home waste from NG's facilities or vehicles. NG will not accept any private trading of NG's goods that are received or collected from customers.

As an employee, you shall not override or change systems and tools, e.g. by manipulating tachographs, driver's cards, finance systems etc. You shall also not manipulate environmental samples, analyses, measurements or reports.

Purchases on NG's sites and licence for second hand retailing (*Nw: brukthandelbevilling*)

You shall never pay cash for iron, metals, scrap vehicles or other types of waste that are purchased at our facilities. If you are in doubt about where the goods come from, you shall ask the customer to provide identification, see *Prosedyre for kjøp av varer inn på anlegg (Procedure for the purchase of goods at a facility)*. Private customers who supply metals with a value over NOK 25,000 in one delivery, or over NOK 75,000 in a single year, are reported routinely to the police as required by NG's licence to trade in second-hand goods.



DO:

- Report any suspicions you may have about corruption and other financial crimes to your manager or via NG's notification system
- Report any suspicion that goods NG has received or purchased are stolen property



DO NOT:

- Do not offer, accept, solicit or pay bribes or carry out any unacceptable offering of financial benefits
- Do not take waste or goods home with you.
- Do not pay cash for the group's purchases of iron, metals, scrap vehicles or other types of waste
- Do not accept/purchase waste at NG's facilities that may be stolen property
- Do not pay out to companies other than the customer or supplier we trade with



15. Gifts and hospitality

NG has a zero tolerance policy against giving or receiving gifts, hospitality or expenses in all cases where this could affect the outcome of a trade or similar business situation. Gifts and hospitality are only acceptable where they are given or received without expectation of getting anything back.

The offer or receipt of gifts is only allowed as a demonstration or reinforcement of a relationship (e.g. a Christmas present), or to promote the employer's business by giving away items with your business logo or other advertising messages (such as a calendar).

Gifts worth more than NOK 500 shall always be approved by your immediate manager before they can be accepted.

Never allow a supplier to pay all the expenses for a trip or a stay. If the journey or the stay is important enough to NG, NG shall pay itself. All travel with future or current suppliers shall be approved by the divisional director/CEO.

The boundaries for what can be accepted or given to a business associate are made clear in NG's *Prosedyre for forebygging av korrupsjon i NG-konsernet* (Procedure for the prevention of corruption in the NG group).

Contact a group lawyer or Compliance if you are in any doubt about an offer or receipt of a gift and/or if hospitality is in breach of the regulations.



DO:

- Report any gifts or hospitality **regardless of value** to your manager. NG wants to have an overview of anything we give and receive
- Decline offers of gifts and hospitality by referring to NG's rules. This will be understood by for example a supplier, who in most cases will have similar regulations themselves



DO NOT:

- Do not accept or offer gifts worth over NOK 500 or gifts where you feel that something in return is expected
- Do not give or accept a gifts, hospitality or services that you would feel uncomfortable having to explain to your manager or your colleagues



16. Privacy and document management

NG respects every individual's right to privacy. Any document, physical or electronic, containing personal information about employees, shall be kept safe.

All NG employees handling personal data, e.g. managers, safety representatives, employee representatives, WEC (Working Environment Committee), HR and salary officers, shall treat information about individuals confidential and ensure that they know the General Data Protection Regulations. All processing of personal data, such as camera surveillance, electronic tracking (GPS) of the Group's cars, access control, salary data, performance appraisals etc. shall be handled according to the Group's internal procedures. All employees should familiarize themselves with NG's governing documentation and internal routines for processing personal data.

Document management

All employees are responsible for ensuring that documents are managed in a safe and proper manner

NG's senior management has access to all information on the system. This does not apply if the document/folder is clearly marked "private".

Take responsibility for your own privacy by clearly separating employer and private files and limiting private storage on NG's equipment.

All work related documents shall be stored in such a way that they are available for colleagues with permission to access them. You are not allowed to store work-related documents locally on your PC (C:) on a permanent basis. Documents that are stored locally are not available to other employees and may be lost if your PC becomes corrupted.

Documents that are going to be discarded and which contain sensitive information (papers and storage media such as USB sticks etc.) shall always be securely destroyed (Nw.: sikkerhetsmakuleres).

Confidential information

Information, knowledge and experience you acquire in connection with the implementation of your duties shall be considered confidential and treated as such, i.e. considered as NG's property. The obligation not to disclose this information applies without a time limit, even after your employment relationship has ended. Familiarise yourself with the group's insider policy in NG-Pro if you are in a position to access stock exchange-sensitive information.



DO:

- If you are in doubt about the handling of personal information, contact your manager or the group lawyer
- Understand that sensitive personal data also includes information about, for example, a person's salary as well as religion, race, health or previous criminal behaviour
- Protect your personal documents: if you have private files on NG's storage media, label them «private»
- Ensure safe and systematic storage of documents that are NG's property and that shall be available for future use



DO NOT:

- Do not process personal data before you are sure you know the requirements with which you shall comply
- Not disseminate information about others' personal data or other information that you acquire in connection with the performance of your work to unauthorised parties, internally or externally
- Do not save documents locally on your PC (C:)



17. Passwords and information security - PC and mobile phone

NG's systems, including PCs and mobile phones, shall be considered as work tools. Both the equipment, systems and information represent considerable value for NG and should be treated accordingly. You are responsible for ensuring that confidential information does not go astray.

You are not allowed to share your personal password with others. You are also not allowed to lend your personal user account to others.

If you suspect that third party has learned your password, this should be changed immediately.

If you discover, or suspect, security has been breached, the IT Department shall be notified as soon as possible. NG is free to suspend all services that could pose a security risk, and that are not considered necessary for work-related activities.

You shall handle and store your mobile phone, laptop/tablet, etc. in a way that prevents theft and confidential information falling into the wrong hands. Exercise special caution in public places.

Employees who have a mobile/telephone and/or PC on behalf of NG are obliged to ensure that the operating system is always updated to the latest version.

You shall not use NG's systems for hacking or to acquire or attempt to acquire, information that you are not supposed to have access to, internally or externally.

It is not permitted to communicate under a false name.

External parties shall not connect to NG's network unless this is agreed with the IT department. Employees shall not connect their own private equipment to NG's network unless this is agreed with the IT department.

NG's IT equipment shall not be used to:

- Participate in gambling or fraud
- Run your own business
- Breaching copyright by, for example, downloading or transferring copyrighted material
- Commit a «cyber-crime» such as sending junk mail (spam) or viruses
- Search for, download and/or disseminate pornographic material
- Deface/attack website



DO:

- Ensure that your computer is protected by anti-virus software
- Ensure you maintain control if others use your IT equipment
- Lock the screen when you leave your workstation
- Use a password on your mobile phone
- Maintain control of equipment when travelling



DO NOT:

- Do not share your personal password with others
- Do not allow external parties to connect to NG's network with their own PCs
- Do not install software or connect hardware without authorisation from the IT Department



18. Communication and contact with media

All external communication during working hours from an employee of NG will be regarded as communication from NG.

You shall be careful and truthful when communicating both internally and externally. Especially when the communication is in writing - including e-mail.

Do not discuss NG's suppliers, customers or partners with competitors or other external contacts. The same applies to content in customer contracts and tenders.

Make sure you do not mix NG's and your own private communications. Use a private email account for private messages.

Be careful when talking about NG in public places such as planes, airports, trains, taxis, restaurants, cafés etc. A representative of a customer, supplier or public authority might be sitting near you.

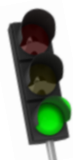
Bring up work related issues internally, primarily directly with the person involved, or alternatively with your manager. Avoid criticism and negative publicity of NG externally. Serious issues are managed in accordance with the whistle blowing guidelines.

Contact with the media

In order to ensure consistency in our communication with the media, all enquiries shall be forwarded to the Central Communications Department, which coordinates NG's media and information service. The department is the group's regular contact with the press and other news media.

In a crisis situation, it is particularly important that all media enquiries are forwarded to the Central Communications Department. Under no circumstances shall statements, interviews or press releases be issued without approval from the Communications Department or Chief Compliance Officer.

Contacts can be found under «Press room» on the group's website www.nggroup.no.



DO:

- Be careful when you write and think before you send email. If you are upset about something, you can save the draft, then update the text and send it the following day
- Ask yourself: «Would I be comfortable if the communication appeared on the front page of a newspaper or was presented as evidence in court?»
- Set up a private email account for private messages and use it



DO NOT:

- Do not send personal email that contains NG's signature
- Do not send personal letters on NG's headed paper
- Do not make statements to the media without having discussed the matter with the Central Communications Department



19. Use of the internet and social media

Feel free to be active online and on social media in your free time, but think through the consequences for NG's reputation before you publish anything concerning your own workplace.

When you are online and on social media, you need to be aware that you are talking to many people, and that everything you write and do can be seen and read by even more people. If you write about your job, it is stored forever. It may for example be a short step from making a casual remark on Facebook about a customer, to the customer also receiving it on their desk.

Confidentiality, privacy rules, the principle of freedom of expression, duty of loyalty and other laws and regulations you comply with at work, also apply to social media.

1. Use common sense and demonstrate good etiquette. Behave in the same manner you would otherwise do in everyday life.
2. Address work-related issues internally, not externally on the internet.
3. Remember that all customer information is confidential. As an employee of the group, you shall not publish information about customers or customer relationships on the internet. This also applies to images. Exceptions require written consent from the customer.
4. NG's email system and computer network shall not be used to download and/or disseminate material that is discriminatory, harassing, pornographic, or may otherwise appear offensive.
5. Internal information, both verbal and written, that is only intended for our employees does not belong on the internet. Competitors can use or misuse such information.
6. Think carefully about what information you disclose about yourself, colleagues and others. You shall not post personal information or images of colleagues and others without their prior consent.
7. Remember that software, audio files, images, etc. shall not be downloaded in violation of our policies.
8. You cannot post someone else's material without their consent. You may quote short excerpts of a text or article, but you shall ensure that the source is clear.
9. If you blog or participate in online discussions, your comments shall be regarded as personal remarks and not as official communication from the group. Make this explicitly clear if you participate in topics or subject areas that are related to your work.
10. Avoid language that may be considered offensive. Focus on the matter, not the person.
11. If you have an email address in NG, this shall only be used/published online where appropriate if it is relevant to your job.
12. Streaming services such as online TV, radio and music streaming, shall be avoided unless it is for work-related use.

See also the section «Personal behaviour - equal opportunities».

The logo consists of the letters 'NG' in a bold, white, sans-serif font, set against a solid orange square background.

Norsk
Gjenvinning

A large, modern industrial building with a grey, metallic facade. A smaller version of the 'NG Norsk Gjenvinning' logo is visible on the building's exterior wall.

Norsk Gjenvinning Norge AS

Postboks 567 Skøyen

NO-0214 Oslo

Switchboard: (+47) 22 12 96 00

www.nggroup.no