



# Code of conduct



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## Dear Colleague

Protan is a business with a foothold in several industries and several countries. Our main market is construction. Our products and services contribute to the development of the countries where we operate. We are proud to protect assets. As individuals and as groups, we encounter ethical and practical situations and dilemmas where our integrity is put to the test. We should never compromise our integrity with any of our decisions. We must make the right choices and when in doubt we should consult with our colleagues and managers.

Everyone who works at Protan must follow the defined frameworks and guidelines that explain why we are here, what we stand for and how we act. This is described in our vision, our values and our code of conduct. With clear frameworks, it is easier to make the right decisions and act uniformly. That makes our Code of Conduct important - for the entire group, for all departments, and for all of us who work at Protan.

Thank you for following these guidelines in your daily work and contributing to Protan's success story going forward.



**Erik Øyno**  
Chief Executive Officer

**We are proud  
of each other**





# 01

## Understanding and applying our Code of Conduct

### PROTAN'S OBLIGATIONS

Protan's mission is that we proudly deliver innovative roofs, membranes, ventilation systems and technical textiles that secure the customer's values. In order to succeed with our mission, we expect all activities in Protan to be in line with the Code of Conduct, which set expectations for our business practices as a company and for the individual employee's personal behavior.

Protan's Code of Conduct applies to all employees, hires, board members and others who act on behalf of Protan.

### MY RESPONSIBILITY AS AN EMPLOYEE OF PROTAN

As a Protan employee, I am obliged to learn and adhere to Protan's Code of Conduct always.

Protan expects me to:

- act in accordance with Protan's Code of Conduct, as described in this document.
- avoid activities that are or may appear unethical or illegal.
- consult with colleagues, managers or others if I am uncertain about ethical challenges and dilemmas.
- report suspected breaches of ethical guidelines or laws and regulations.

### MY RESPONSIBILITY AS A MANAGER

As a manager, I am a role model and have significant influence on how we handle different situations. I therefore have a special responsibility to contribute to ensuring that we behave ethically in everything we do. In addition to complying with Protan's Code of Conduct, I am expected to:

- ensure that employees and other representatives of Protan understand our values and ethical guidelines and motivates them to adhere to them.
- promote trust, openness and equality in the working environment, so that employees can express opinions and raise concerns in good faith and without fear of retaliation.
- contribute to results and target achievement by involving employees and facilitating compliance with Protan's values; commitment, cooperation, quality and responsibility.
- make decisions in the best interest of the Protan Group.



## OUR VALUES

We have four values that guide our attitudes and actions. Our clients, partners and colleagues must experience the values in interaction with us.

### Engagement

We take ownership, we are creative and innovative, we are enthusiastic, we are eager to succeed.

### Collaboration

We value and treat each other with respect, we are inclusive, focused on sales and communicate clearly.

### Quality

We are knowledgeable, meet requirements, exceed expectations and deliver without error.

### Responsibility

We are reliable, carry out our plans, learn from our successes and our failures, and we deliver.



## 02

# Violation of our ethical guidelines

### WHISTLEBLOWING

All employees have the right and duty to report suspicious conditions or any misconduct in the business. Matters that shall be reported are for example; violations of laws and regulations, company guidelines, financial infidelity, corruption, harassment or risk for life and well-being.

Reporting any misbehavior that you are aware of or concerned about to your line manager is required. If this is not possible, you shall use our whistleblowing channel where you can report anonymously. Our whistleblowing channel is available in different languages.



Scan this QR code to go to Protan's external notification channel

In addition to your line manager, you can also notify a manager at a higher level, a safety representative, or the group's HR Director.

### CONSEQUENCES OF BREACH

All activities in Protan Group shall be in accordance with our Code of Conduct. Any breach of the ethical guidelines can have major consequences for Protan's business and reputation. We will take appropriate action for any violations. For employees, this may mean disciplinary consequences which, in serious cases, may involve dismissal or resignation, and possible notification to the relevant authority.

# 03

## Caring for people and the environment

### HEALTH, SAFETY AND WORKING ENVIRONMENT

Protan is a place where employees can grow personally and professionally and enjoy a healthy and meaningful work environment. Good health is important to us and is a critical success factor for achieving our goals. We are responsible for our own and others' safety and our main priority is to ensure safe working conditions for all our employees. We have a vision of zero injuries and accidents. Protan has implemented good safety routines and conducts safety training on jobs that we carry out.

All our employees are entitled to stop work if there is an imminent danger to life or health. In such cases, the line manager must be notified immediately.

### DRUGS AND ALCOHOL

Protan is a drug-free workplace and all use, storage and/or sale of narcotic substances is prohibited.

On occasions where there is access to alcohol, for example during representation, travel activities, participation in courses and conferences and other work-related occasions, we shall show moderation and act in a way that does not compromise the company's reputation, or our integrity.

### PROTECTING THE ENVIRONMENT

Our products and services are environmentally friendly, of high quality and with a low climate and environmental impact. We carry out our business through the efficient use of materials and energy, with a focus on reducing the use of natural resources and reducing emissions and waste to a minimum. We strive for our products to be recycled. Protan encourages clients, suppliers and stakeholders to choose environmentally friendly solutions.



### EQUALITY, DIVERSITY AND INCLUSION

At Protan we value diversity and do not tolerate any type of discrimination, harassment, bullying or threats of any kind by our colleagues, clients, suppliers or partners. Actions that can reasonably be perceived as offensive or intimidating, including any form of unwanted attention of sexual nature, are not accepted.

At Protan, we treat everyone fairly and with respect, regardless of gender, nationality, ethnicity, religion, sexual orientation or political views.

### HUMAN AND LABOR RIGHTS

We support and respect internationally proclaimed human and labor rights. Protan acknowledges all employees' right to form and join trade unions of their own choice. We have a long tradition of including and involving employees and their unions and believe this improves decision-making processes.

Protan will not use any form of child or forced labor and will not tolerate working conditions or treatment that conflicts with international laws and practices. Protan shall ensure that the company, through its operations, does not cause any infringement of human and labor rights.

We are committed to implement and enforce effective systems to minimize risks of human and labor rights infringements in our own operations and in our supply chain.



# 04

## Acting with integrity

### ANTI-CORRUPTION

Protan has zero tolerance for corruption. All transactions must be contractual, legal and of a commercial nature.

No benefit should ever be asked for, demanded or accepted to influence business decisions, for our own or others' sake. Nor should we ever offer, promise or provide such benefits to our suppliers, clients or business partners. We should never make payments or give benefits through agreements with consultants, brokers, agents or other intermediaries.

We expect all our business relationships to have their own ethical standards guidelines, and that they comply with Protan's Code of Conduct where this is a natural part of the collaboration.

### FAIR COMPETITION

Protan emphasizes fair and open competition. Protan's employees must always follow the competition rules and never engage in illegal activities such as fixing prices, dividing markets or other actions that harm fair competition in violation of current competition laws. When in doubt, before carrying out any plans or actions that may conflict with the competition law, the relationship must be legally evaluated.

### FRAUD AND THEFT

At Protan, we act honestly, fairly and with integrity. We never obtain any form of financial benefit or profit through illegal, fraudulent or unethical behavior from either Protan, clients, suppliers or partners. We protect company assets from damage, theft and misuse, and use them responsibly for work that is in line with our values and ethical guidelines.

### SUPPLIERS AND BUSINESS PARTNERS

Our suppliers and business partners are essential for us to be able to run our business, but they can also entail risks with regards to operations, legal matters and reputation. We manage these risks by having a good knowledge of our business partners and the markets we operate in. We expect suppliers and business partners to follow current legislation, respect human rights and comply with our ethical values and requirements.

### TRAVEL, REPRESENTATION, EVENTS AND GIFTS

Business relationships are a natural part of Protan's business but must be maintained openly and within moderate limits. Protan's employees may attend social events, lunch, dinner and entertainment that have clear professional/business value, after getting approval from their manager.

The guidelines above also apply to employees who, on behalf of Protan, invite clients, suppliers or other business partners on trips and representation events. Line manager must approve such arrangements in advance.

Giving or receiving gifts on special occasions may be okay, but they must not be expensive. Extra caution must be used with gifts and representation when contracts or other important decisions are involved. Line manager must always be consulted when it comes to giving or receiving gifts or other benefits.

### CONFLICT OF INTEREST

Protan's employees must avoid any situation that could create a conflict of interest between personal interests and Protan's interests. Inform your line manager about possible conflicts of interest that may arise. Decisions on behalf of Protan must not be influenced by personal interests. All competing activities with Protan are not permitted.

### **CONFIDENTIALITY**

All employees are subject to confidentiality when it comes to business confidential information. We are all important ambassadors for the company. This means that we must be aware of how we refer to Protan. We expect this to also continue after the end of the employment relationship.

### **PRESS AND SOCIAL MEDIA**

Protan acts professional in all manners. Only those authorized to speak to the press can do so on behalf of Protan. Social media shall be used in a thoughtful way that does not damage our reputation. Our employees understand that we are also representatives of Protan outside working hours.





## Questions?

If you are in doubt or have questions about these guidelines, please contact your manager or Protan group. You can also send your questions and comments directly to:

[hrsupport@protan.no](mailto:hrsupport@protan.no)