

# KLAVENESS FOOTWEAR GROUP

## Code of Conduct

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### **1. Our Business Principles**

- Klaveness Footwear Group complies to always act as a responsible organization with a good reputation regarding openness, honesty, and our ability to fulfil our obligations towards society. At the same time, we create added value for all our stakeholders.
- Klaveness Footwear Group Code of Conduct constitutes the framework for our business activities. The Code of Conduct applies to all employees, its management, and the Board of Directors within all markets and on all occasions. Klaveness Footwear Group Code of Conduct was first adopted by the Board of Directors of Klaveness on 10 December 2020.

### **2. Code of Conduct Application**

- The Code of Conduct summarises existing principles for the Klaveness Footwear Group and shall be used as a reminder of how our daily business activities shall be performed.
- Each employee within the Klaveness Group shall have access to the Code of Conduct and confirm that they have understood the Code of Conduct and will comply with it.
- The Code of Conduct will be published on the group website.
- Each company of Klaveness Footwear Group must ensure that the Code of Conduct is brought to the knowledge of new employees.
- Any questions that an employee may have should be addressed to their immediate manager.

### **3. Klaveness Footwear Group's Fundamental Principles**

- We respect each individual's rights and will not discriminate or commit other human rights violations.
- We respect our employees and their rights.

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- We shall conduct our business in a way that contributes to a sound and sustainable environment.
  - Klaveness encourages fair competition and has a zero-tolerance for corruption.

#### **4. Human Rights**

- Klaveness Footwear Group supports and respects the international conventions regarding human rights, and we must ensure that we in no way violate any human right.
- Klaveness Footwear Group shall renounce every form of discrimination regarding, for example, gender, ethnic origin, age, disability, religion and sexual persuasion, experience, lifestyle, education, values, and family situation.
- Klaveness Footwear Group employees shall not harass or discriminate against colleagues or business partners for any reason.

#### **5. Environment**

- We shall endeavour to reduce our negative impact on the environment. Consideration shall be given to the environment, safety and health when developing products and processes.
- We shall reduce our consumption of energy and office supply.
- We prioritize environmentally friendly technology and consider telephone and video conference meetings before travelling.

#### **6. Labour**

- Klaveness Footwear Group shall respect employees' rights to be represented by trade unions and their right to participate in collective employment agreements.
- Klaveness Footwear Group shall uphold the elimination of all forms of forced, compulsory or child labour.
- We shall use suppliers who observe prevailing labour legislation.
- Salaries will be paid as agreed and on time. We will recognize good performance and extra efforts.
- We shall always prioritize the health and safety of employees.
- Klaveness Footwear Group shall constantly endeavour to reduce the risks and effects of accidents.

#### **7. Anti-corruption**

- Klaveness Footwear Group encourages fair competition and has zero tolerance for corruption and cartel behaviour.
- Employees may not benefit from business opportunities that arise as a direct consequence of Klaveness' business activities.
- Board membership in competing companies or with customers or suppliers, as well as own side businesses, shall be approved in advance with the employee's immediate manager.
- All companies within the group shall be aware of and strictly observe prevailing laws and ordinances. Upon uncertainty, each employee shall seek advice and information from their immediate manager.
- Each employee is encouraged to report any illegal or unethical behaviour.

#### **8. Open and Honest Communication**

- Klaveness Footwear Group's principle is that all communication shall take place in accordance with prevailing legislation. Our communication shall be transparent and honest.
- Klaveness Footwear Group shall maintain good relations with all stakeholders through frequent contact, clarity and good ethics.

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- We are open and accurate within the limits of business confidentiality. Employees are required to observe the rules of confidentiality regarding the Company's proprietary information and information that might influence the share price.

#### **9. Conflicts of Interest**

- Klaveness Footwear Group takes its business decisions based on what is best for the Company and not on personal considerations or relations.
- Employees shall avoid each situation where personal interests conflict with the Company's interests, for example, assignments with competitors, customers or suppliers of Klaveness Footwear Group - irrespective of whether such are remunerated or not.
- Klaveness Footwear Group does not make any contributions or gifts to political parties or individual politicians, and employees may not make such contributions on behalf of Klaveness Footwear Group.
- Employees of Klaveness Footwear Group may not offer or accept gifts, benefits, commissions, or entertainment to or from any third party that could influence the employee's professional judgment upon performing work for Klaveness Footwear Group.

#### **10. Information About the Klaveness Group**

- "Klaveness Footwear Group" refers to Klaveness AS and all companies in the ownership of Klaveness AS
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- Telephone +47 33 48 97 00
- E-mail [info@klaveness.no](mailto:info@klaveness.no)
- Our website, [www.klaveness.no](http://www.klaveness.no), contains information about the Klaveness Group.