

CODE OF CONDUCT FOR **OUR EMPLOYEES**

INTRODUCTION

In your job you sometimes arrive at a situation where it can be difficult to decide what is right or wrong. Our code of conduct will help you to make the right decisions.

The code of conduct is in addition to our existing policies, rules and other guidelines, and is a part of the terms and conditions of employment at Umoe Restaurants.

The internal code of conduct includes:

1. The behaviour of our co-workers
2. Corruption, bribery and competition rules
3. Whistle blowing
4. Our relationship with business partners
5. Workplace standards
6. When interacting with guests
7. In interaction with society
8. Sponsorship

1.

THE BEHAVIOUR OF OUR CO-WORKERS

- In their contact with our customers and partners, every employee must in all situations promote our values of: clarity, boldness, attentiveness, and honesty and fairness.
- An employee may not participate in activities where a potential conflict of interest may arise between the interests of the company and those of the employee or parties closely related to them
- The employee cannot on behalf of the company make decisions that may affect their own financial interests or those of a party closely related to them.
- Any external commitments the employee may have, must not be an obstacle to he/she carrying out their duties and functions. Any external commitment must also not undermine the trust of the company. The integrity of us as a company, or of any of our employees, must never be in question. In cases of doubt, the employee must provide information about the external commitment to their immediate manager.
- Employees must not receive gifts that exceed a value of NOK 500, if this happens, the gift must be clarified by their immediate manager.

2.

2. CORRUPTION, BRIBERY AND COMPETITION RULES

- Umoe Restaurants wants a level playing field. We distance ourselves from all forms of corruption, price fixing, bribery and other anti-competitive activities. This is illegal and must not occur.
- All procurement, collaboration and agreements must be characterised by open and verifiable processes.
- Personal payments, kickbacks or bribery are strictly prohibited.
- Our employees must not take advantage of their position in order to achieve personal benefits, such as inappropriate gifts or the payment of events or trips. All gifts and sponsored events must be clarified with their immediate manager.
- Employees must never receive remuneration to gain business or private benefits for themselves, or for the benefit of customers, agents or suppliers.
- Work related travel expenses are covered in accordance with our travel policy.

3. WHISTLE BLOWING

- In order to create safe working conditions, all employees are responsible for providing notification of unacceptable circumstances (violations of statutory provisions, internal rules, or ethical standards). See Umoe Restaurants' routine for whistle blowing.
- Whistle blowing is positive for the business and society, and notification must be provided to the person in charge, or someone who has the opportunity to do something about it.
- All notifications must be processed in such a way that the person giving the notification remains anonymous (only the notifier and the recipient of the notification know who the whistle blower is) if they so desire.
- Umoe Restaurants has established an encrypted whistle blowing channel where employees can provide notification of unacceptable circumstances.
- The management must consider how the circumstances that they have been notified of will be dealt with. Anything unacceptable must be dealt with.

4. RELATIONSHIP WITH BUSINESS PARTNERS

- Umoe Restaurants will inform their business partners through appropriate channels of our policies and ask them to take the principles into consideration in all relevant circumstances.
- Our deliveries/products will meet the agreed standards of quality.
- Umoe Restaurants are continually working to improve their own procurement policies and practices.
- We must avoid trading partners who are active in countries that have had a trading boycott imposed on them by the United Nations and/or the Norwegian authorities.
- Umoe Restaurants evaluates its procurement of products and services according to the following criteria:
- Quality, economy, ethics, environment, employee needs, our principles of sustainability, and product specific requirements.

5. WORKPLACE STANDARDS

- We must ensure satisfactory working conditions for our employees, including reasonable health and safety standards.
- We do not tolerate any form of discrimination, bullying or harassment of our employees. All employees are entitled to fair and equal treatment.
- We respect the freedom of organisation and the right to collective bargaining. All employees are entitled to become a member of, as well as form, unions.
- We do not use any kind of forced labour.
- In accordance with international agreements, Umoe Restaurants avoids employing minors.
- Umoe Restaurants offer adequate salaries, which – as a minimum – comply with local agreements and regulations.
- Umoe Restaurants supports the introduction and maintenance of minimum wage levels.
- The staff are offered training that is relevant to their function.
- Umoe Restaurants respect the privacy of employees and protect relevant data accordingly.

- Private use of work equipment and material must be in accordance with established guidelines and in agreement with the manager.

6. IN INTERACTION WITH GUESTS

- We make our living from our guests. Our guests must be treated with respect and consideration for their needs and wishes.
- We must protect the right to personal integrity.
- Customer privacy is respected, and any data is protected.
- Personal data must always be processed in accordance with legislation.
- We have zero tolerance for human trafficking, theft, embezzlement, and other forms of criminality. In the event of any such circumstances, it is important that the nearest manager is notified / our guidelines are followed, in order that the situation can be resolved.
- Complaints are dealt with efficiently, and they are considered to be a valuable contribution to the work on being able to ensure a constant high level of service

7.

IN INTERACTION WITH SOCIETY

- Everyone who works at Umoe Restaurants has a responsibility to safeguard the company's good reputation.
- Internet access and email accounts are the property of the employer and must be used as a work tool. When using the internet and e-mail, you are a representative of the company. Actions are identified as the actions of the company, and you therefore have a responsibility to represent the company
- The company allows personal use of the internet and the sending/receiving of personal e-mail, so long as it does not compromise the execution of work tasks. Private e-mail must be saved in a separate folder labelled "Private". In this way, if the employer has to access your email account in order to retrieve business information, they can easily see what is work related and what is private.
- Employees are encouraged to use private e-mail to communicate private matters.
- It is strictly forbidden to use the email account for any forwarding or saving of pornographic, racist or other illegal or objectionable material. If such material is received, the IT department must be contacted in order for them to consider blocking the sender from our servers. It is also forbidden for the Internet to be used to browse pages with such content, or to download such content.
- Sensitive information relating to people or the company must not be sent via the company's e-mail system. As far as they are appropriate, these guidelines also apply to the use of mobile phones and other electronic communications media that are available for workers to use at work.
- We believe that clear and predictable behaviour, combined with open, honest and clear communication is important to our credibility and integrity.
- Statements to the media on behalf of the company must be made by the CEO, chain director, and communications director, or persons to which they have delegated this responsibility.
- We must be transparent and factually informed in both internal and external communication.
- We must not be used as a reference case for matters unless this has been clarified in advance with the group management.
- The chain director informs the group CEO and communications director in the event of a crisis situation and any approaching major media and reputation issues.
- With the private use of social media, confidentiality obligations must be adhered to and it must not harm the company's reputation or business interests. Statements on behalf of the company must only to be made by authorised personnel.
- We must have a good and healthy relationship with our competitors and discuss them in a respectful manner. When collaborating with competitors we must pay attention to what information we share.

8. SPONSORSHIP

- All sponsorships must be clarified by the communications director and approved by the CEO.
- Sponsorships must primarily support our sustainability strategy and have a positive social contribution.
- Sponsorship activities must not prioritise individuals with a connection to Umoe Restaurants, be perceived as an attempt to bribe/detect competition, or incur a negative reaction from our colleagues.