

SUPPLIER CODE OF CONDUCT

Trainor's Supplier Code of Conduct describes the principles that Trainor's suppliers and, if used, sub-suppliers must comply with. High ethical and moral standards will always characterise the way Trainor does business. Trainor sets high standards for its own operations and employees concerning environmental, social, and governance matters, and expects the same standards for its suppliers and their sub-suppliers. Our business partners must operate in a safe and environmentally friendly manner and must meet all the requirements set out in prevailing contracts and regulations.

Purpose

At Trainor, we care about people, society, and the environment. A sustainable society requires us to set the bar high with regards to environmental, social, and governance matters. Trainor tolerates no form of corruption, bribery, human rights abuses, discrimination, distortion of competition or unnecessary impact on the environment.

This document guides all Trainor's business dealings, and we require our suppliers to abide by the same ethical principles. This Supplier Code of Conduct (the "Code") sets out the principles that Trainor requires its suppliers to accept and follow.

Who does the Supplier Code of Conduct apply to?

The Supplier Code of Conduct applies to all companies that supply products and/or services to Trainor. It includes suppliers and their sub-suppliers, as well as their employees and consultants (in the following referred to collectively as "suppliers"). Suppliers are responsible for ensuring that everyone who is involved in the delivery has read, understood, and agreed to abide by the principles set out in the Code. Suppliers must have a process in place to ensure and verify compliance with the Code and are responsible for ensuring that their sub-suppliers also abide by it.

The Supplier Code of Conduct is an essential part of the contract between Trainor and the supplier. Violation of the Code could result in the termination of the business relationship.

What Trainor requires of its suppliers

Laws and regulations

Suppliers must respect and comply with the laws and regulations in the countries in which they operate. All suppliers to Trainor are also asked to comply with the principles set out in the UN Global Compact, the Universal Declaration of Human Rights, the fundamental ILO Conventions on Labour Rights, as well as other relevant ILO Conventions such as nr. 94, the International Covenant on Economic, Social and Cultural Rights (ICESCR), the International Covenant on Civil and Political Rights (ICCPR) and the OECD Anti-Bribery Convention.

These obligations include:

Labour rights and working conditions

Suppliers' employees are entitled not to be subject to degrading treatment. Employees must be paid, enjoy good working conditions and not be subject to discrimination. All employees must be treated equally, irrespective of gender, religion, ethnicity, sexual orientation, age, disability, or pregnancy etc. Employees must have safe and healthy working conditions. They must have a legitimate contract of employment, the right to a

good standard of living and wellbeing, the right to rest and regular paid holidays. Procedures for regulated working hours and compensation, as well as procedures to provide expectant mothers with special protection and paid leave both before and after giving birth, must be in place and complied with.

Child labour

Trainor accepts no form of child labour. The provisions of the ILO conventions on child labour and children's rights must be fully complied with. Suppliers must require that no form of child labour be used anywhere in their value chains. If child labour is discovered, the supplier must have routines and procedures in place to deal with it, with the aim of creating the best possible outcome for the child.

Freedom of association and the right to organize

Employees are entitled to organize and must have the opportunity to join a trade union. They must also have the right to strike. Where the law of the land restricts these rights, the supplier must take action to promote them based on human rights principles and the provisions set out in the various conventions.

Freedom from forced labour

All prohibitions against forced labour and slavery must be observed. If evidence of modern slavery or forced labour is discovered, suppliers must have routines and procedures in place to deal with their negative impact on human rights, with the aim of achieving the best possible conditions for those concerned.

Corruption

Trainor rejects all forms of corruption. Neither suppliers nor their managers or owners may have been convicted of corruption, fraud, or money laundering. Suppliers must not, for the purpose of obtaining commercial advantage, offer, promise, or give Trainor's employees monetary gifts or other considerations. If corruption or other violations of the Code are suspected, we encourage all parties to report the matter to us. Through our whistleblowing channel, concerns about wrongdoing may be reported anonymously.

Distortion of competition and confidentiality

Suppliers must always act in accordance with prevailing competition laws and regulations. Suppliers must not share information or enter into agreements with competitors, customers or suppliers in a manner which contravenes competition laws and regulations. Information accruing to suppliers in connection with their collaboration with Trainor must be treated as confidential and must, under no circumstances, be shared with any third party. Suppliers with elevated access to Trainor's core systems, including, but not exclusive to, Trainor Portal, ERP and CRM, may be considered to sign a non-disclosure agreement, based on the nature and scope of the work that is to be performed.

Payment of taxes

Suppliers must meet all their obligations with regards to registration and the payment of taxes (direct, indirect, and national insurance contributions), both in their own country of incorporation and that of the client. Trainor requires that this can be documented.

Quality, Health, Safety and Environment

Suppliers must have identified risk factors relating to quality, health, safety, and environment (QHSE) issues. Suppliers must have systems and routines in place covering these areas. This will be followed up through Trainor's supplier assessment process and is crucial in determining whether the supplier may be offered a contract. Among other things, suppliers must be able to show that their production facilities and working conditions are designed to minimize the risk to employees of occupational accidents, injuries and stress, and to avoid harmful environmental impacts.

Environment

As far as possible, suppliers must prevent and constantly endeavour to limit any harmful environmental consequences deriving from their activities. Suppliers shall strive to perform all their activities in an environmentally sustainable manner and comply with or exceed prevailing environmental standards. This includes reducing emissions to air, soil, and water. The supplier's services, products and processes must be optimized to consume energy, natural resources and raw materials as efficiently as possible and to minimize

the volume of waste and scrap materials. Suppliers must avoid materials and methods that pose a risk to the environment and the climate where other available and viable alternatives exist.

Information security

Suppliers must implement necessary and appropriate information security measures, committing to ensuring the appropriate confidentiality, integrity, and availability of all data being processed. Based on the nature of the supplier relationship and the data processing of Trainor employee and/or customer data, Trainor may require proper documentation of such, including, but not limited to, information security policies, procedures and measures.

Compliance

Trainor reserves the right to visit suppliers to verify their compliance with the Supplier Code of Conduct. Should any lack of compliance with the points set out above be identified, sanctions will be based on the agreement between the parties. If it does not follow on a contractual basis, the provisions of the Purchase Act apply as far as they are appropriate. In the event of serious non-compliance, the contract may be terminated.

Supplier’s pledge:

The supplier hereby pledges to comply with Trainor’s Supplier Code of Conduct during its own operations and demand the same from its sub-suppliers. The supplier further pledges to report any suspected violation of or imperfect compliance with the provisions of this Code of Conduct to Trainor via e-mail to post@trainor.no. The undersigned supplier confirms its compliance with the obligations set out above. The undersigned confirms the existence of compliance monitoring procedures.

Company name: _____

Company representative: _____
(name)

Date and location: _____

Signature: _____