

Policy for sustainable business conduct

Backe works towards a **sustainable business conduct** that respects people, society, and the environment. This policy document, including Principles for Sustainable Business Conduct, forms the basis of our business operations.

Backe is a long-term and reliable player in the Norwegian construction industry, with professionalism, ambition, and honesty as core values. We strive for a serious work environment with secure conditions for employees, the development of new skilled workers, and an open corporate culture. We uphold high ethical standards in all our business operations and purchases. Our vision is “Together we make a difference,” and everything we do is characterized by long-term commitment and sustainability.

Sustainability is embedded in our core values and strategy, and as part of our work with social sustainability, we will gain insight and take responsibility for monitoring human rights and working conditions within our supply chains. This insight will be used for concrete action.

Backe is a major purchaser of goods and services, both through direct procurement and indirectly via our subcontractors. The scope of producers and supply chains is extensive, and we cannot rule out that violations of human rights and unacceptable working conditions may occur during production or within supply chains.

Contractors in the construction industry often have supply chains that involve many of the same suppliers and wholesalers. Therefore, Backe will actively pursue cooperation on overarching due diligence assessments within the industry and in collaboration with NHO Byggenæringen and the Norwegian Contractors' Association. Backe is a member of Ethical Trade Norway.

Backe will conduct due diligence assessments for sustainable business practices related to our operations and procurement. This means:

- carrying out our own risk assessments of negative impacts on people, society, and the environment
- stopping, preventing, and mitigating negative impacts
- monitoring, monitoring the effectiveness of, and communicating measures to affected parties
- seeking to remedy harm where our activities cause or contribute to negative impacts
- holding our suppliers accountable

Backe supports the right to free trade union organization and other forms of democratically elected worker representation. We will involve worker representatives and other relevant stakeholders in our work with responsible procurement practices.

In line with our value of honesty and the Norwegian Transparency Act, we will make our due diligence assessments available and report them at backe.no and remain open to dialogue with our stakeholders in our work on social sustainability.

Backe will have accessible and secure whistleblowing channels that enable employees, business partners, and other stakeholders to report concerns about unacceptable conditions, in accordance with applicable regulations. The whistleblowing system shall ensure confidentiality, protect the identity of the whistleblower, and prevent retaliation.

Eirik Gjelsvik
Group CEO Backe

Date/place



Principles of sustainable business conduct

Backe considers sustainable business conduct to be one of its most important tools regarding sustainability efforts. Backe shall have a procurement practice that strengthens its suppliers' ability to meet our requirements.

The principles of sustainable business conduct outlined below apply to Backe and constitute requirements for our suppliers. The principles are based on UN and ILO conventions and specify minimum, not maximum, standards. The legislation at the place of production/manufacture shall be respected. Where national laws and regulations cover the same topic as these guidelines, the higher standard shall apply.

1. Forced labour/Slavery (ILO Conventions no. 29 and 105)

1.1	There shall be no forced, slave or involuntary labour.
1.2	Workers shall not be required to provide deposits or identity papers to their employer and shall be free to terminate employment with reasonable notice.

2. Freedom of association and the right to collective bargaining (ILO Conventions no. 87, 98, 135 and 154)

2.1	Workers shall, without exception, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, hinder, or oppose the formation of unions or collective bargaining.
2.2	Trade union representatives shall not be discriminated against or prevented from carrying out their union activities.
2.3	Where the right to freedom of association and/or collective bargaining is restricted by law, the employer shall facilitate, and not hinder, alternative mechanisms for free and independent organization and negotiation.

3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions no. 138, 182 and 79, and ILO Recommendation no. 146)

3.1	The minimum age for workers shall not be less than 15 years and comply with 3.1.1 national minimum age legislation for employment, or 3.1.2 minimum age for compulsory schooling, whichever is higher. Where local minimum age is set at 14 years in accordance with the exception in ILO Convention 138, this may be accepted.
3.2	No recruitment of child labour in violation of the above minimum age shall take place.
3.3	Children under 18 shall not perform work that is harmful to their health, safety, or morals, including night work.
3.4	Action plans shall be established for the rapid elimination of child labour in violation of ILO Conventions 138 and 182. These plans shall be documented and communicated to relevant personnel and other stakeholders. Support schemes shall be facilitated to enable children to access education until they are no longer of compulsory school age.

4. Discrimination (ILO Conventions no. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1	There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
4.2	Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behavior, and against discrimination or unfair dismissal, for example due to marriage, pregnancy, parenthood or HIV status.

5. Harsh or inhumane treatment (UN Covenant on Civil and Political Rights/UDHR)

5.1	Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, are prohibited.
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6. Health, environment and safety (ILO Convention no. 155 and ILO Recommendation no. 164)

6.1	Efforts must be made to ensure workers a safe and healthy working environment. Hazardous chemicals and other substances must be handled responsibly. Adequate measures must be implemented to prevent and minimize accidents and personal injury resulting from, or associated with, conditions at the workplace.
6.2	Workers must receive regular, documented health-and-safety training, in accordance with regulatory requirements and Backe's requirements. Health-and-safety training must be repeated for new or reassigned workers.
6.3	Workers shall have access to clean sanitary facilities and safe drinking water. Where relevant, employers shall also provide facilities for safe food storage.
6.4	Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and safe drinking water.
6.5	All our external partners shall be able to document their compliance with statutory and contractual HSE requirements.

7. Wages (ILO Convention no. 131)

7.1	Wages for a normal working week shall at a minimum comply with national minimum wage regulations or industry standards, whichever is higher. Wages shall always be sufficient to cover basic needs, including some savings.
7.2	Wage conditions and payment shall be agreed in writing before work commences. The agreement shall be understandable to the worker.
7.3	Deductions from wages as a disciplinary measure shall not be permitted.

8. Working hours (ILO Conventions no. 1 and 14)

8.1	Working hours shall comply with national laws or industry standards and shall not exceed limits set by applicable international conventions. Normal working hours shall generally not exceed 48 hours per week.
8.2	Workers shall be provided with at least one day off for every 7-day period.
8.3	Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement or national law.

8.4	Workers shall always receive overtime compensation for all hours worked beyond normal working hours (see 8.1 above), minimum in accordance with applicable legislation.
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9. Regular employment

9.1	Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short-term contracts (such as contract labour, casual labour or day labour), subcontracting or other labour relationships.
9.2	All workers are entitled to a contract of employment in a language they understand.
9.3	The duration and content of apprenticeship programs shall be clearly defined.

10. Marginalized populations (UN Covenant on Civil and Political Rights, Art. 1 and 2)

10.1	Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.
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11. Environment

11.1	Negative impact on the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.
11.2	National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.

12. Corruption

12.1	Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.
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13. Animal welfare

13.1	Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.
13.2	National and international animal welfare legislation and regulations shall be complied with.

14. Conflict minerals

14.1	Minerals such as tin, tantalum, tungsten, or gold (3TG) shall not be used if they directly or indirectly finance armed groups or contribute to serious human rights violations.
14.2	A system shall be established to identify the origin of such minerals and to comply with OECD's guidelines for responsible supply chains of minerals from conflict-affected and high-risk areas.

15. Trade sanctions

15.1	Trade partners with activities in countries subject to a trade sanctions by the UN and/or Norwegian authorities shall be avoided.
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16. Whistleblowing

16.1	The organization shall establish secure, accessible, and confidential whistleblowing channels that enable employees and other stakeholders to report concerns about unacceptable conditions within the organization or the supply chain without fear of retaliation.
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17. Compliance

17.1	We encourage our external partners to contribute to our improvement processes by providing feedback to Backe and our companies on opportunities for improvement.
17.2	We may, at any time, conduct audits of our external partners' compliance with the requirements set forth in this document, as well as other statutory, contractual, and applicable requirements.



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Eirik Andre Gjelsvik

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