

MANAGEMENT AND COMPETENCE (HR) - ETHICAL GUIDELINES - PROCEDURE

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Valid for: Avinor AS, Svalbard Airport

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1 DESCRIPTION

WHY DO WE HAVE ETHICAL GUIDELINES

Avinor manages public funds, and the execution of our operations holds significant importance for society and our business partners. Avinor is therefore dependent on trust and a good reputation among the public. This trust is built through the actions and conduct of each individual.

Avinor's ethical guidelines express the Avinor Group's values and attitudes in interactions with customers, suppliers, colleagues, and other stakeholders. The purpose of these guidelines is to enhance our awareness, help us make the right choices when faced with ethical dilemmas as a company or as individual employees, and thereby reduce the risk of misconduct. The ethical guidelines are part of Avinor's governing documents and an integral part of our business conduct. The requirements outlined here regarding business practices and personal behavior apply to employees, board members, hired personnel, and others acting on behalf of Avinor.

However, the guidelines do not provide answers to all dilemmas one might encounter. Good judgment is required to determine whether a specific action or decision is ethically justifiable. If there is any doubt, it is important to initiate an open and confidential dialogue about the issue with your immediate manager or other trusted individuals.

Avinor's suppliers and other contractual partners must be made aware of Avinor's ethical guidelines prior to entering into a contract. Separate principles for responsible business conduct have been developed, and it is expected that suppliers and other contractual partners adhere to ethical standards that align with Avinor's ethical requirements.

VISION

We connect Norway and the world through sustainable aviation

MISSION

Avinor shall develop and operate a safe, efficient, and sustainable aviation system across the entire country.

VALUES

- Transparent
- Responsible
- Action oriented
- Customer oriented

2 IMPLEMENTATION

AVINOR AS A RESPONSIBLE EMPLOYER AND CONTRACTING ENTITY

Employee Rights, Human Rights, and Social Dumping

Avinor actively works to ensure that its operations are conducted in accordance with internationally recognized principles of business ethics and social responsibility, including the UN Covenant on Economic, Social, and Cultural Rights, the UN Covenant on Civil and Political Rights, and the ILO Core Conventions on fundamental rights and principles in the workplace. This applies to our own employees, hired personnel, and employees of our suppliers/contracting partners.

Responsibility in the Supply Chain

When selecting suppliers, the supplier's efforts regarding human rights, employee rights, anti-corruption, and work on climate and environmental issues shall be included as one of several evaluation criteria.

Avinor has developed specific principles for responsible business conduct to ensure this. These principles apply to the entire supply chain. If irregularities related to the supplier principles are discovered, measures shall be implemented to address them.

Health, Safety, and Environment (HSE)

At Avinor, taking care of health, safety, and the environment is an integral part of our operations and aligns with our business mission of taking responsibility. We shall act responsibly and aim to reduce our environmental impact. This includes emissions to water, air, and soil, resource consumption (including energy and water usage), and waste management. We will focus on reducing both direct and indirect greenhouse gas emissions in our operations.

All employees share responsibility for ensuring that work is carried out under safe conditions and in a manner that ensures a fully satisfactory working environment, promotes health, safety, and well-being, and protects the environment.

Digital Security and Ethical Use of Artificial Intelligence (AI)

IT systems must never be used to carry out illegal or unethical actions (including downloading, sharing, or otherwise handling offensive or unlawful material).

The development and use of artificial intelligence must be based on ethical principles and respect human rights and democracy. We shall contribute to responsible and reliable artificial intelligence while safeguarding individual integrity and privacy.

Processing of Personal Data

Avinor's processing of personal data shall comply with laws and regulations. Avinor shall only collect, process, and store personal data for legitimate business purposes and shall not retain such data longer than necessary for the purpose for which it was collected. Each individual is responsible for ensuring that sensitive information is stored securely. All legal and regulatory provisions regarding confidentiality and privacy shall be adhered to.

EVERYONE MUST TAKE RESPONSIBILITY FOR A GOOD WORK ENVIRONMENT AND AVINOR'S REPUTATION

Conduct

There must be consistency between what we say and what we do. Leadership must lead by example, including in matters of ethics. All employees have an independent responsibility to contribute to maintaining the trust and reputation of the organization. Proper ethical behavior must always be highly valued.

All employees must contribute to a positive work environment where everyone is treated with respect, shown care, and given responsibility. Tolerance must be shown for employees' attitudes and opinions. No one shall be discriminated against or harassed. Any form of abuse of power is not tolerated. There must never be any doubt about the integrity of Avinor's employees. Personal interests must not influence decisions in a way that conflicts with Avinor's interests or damages Avinor's reputation. Employees at Avinor must act with respect and equality toward others, regardless of gender, ethnicity, political views, religion, or beliefs.

Sexual Harassment

No one shall be subjected to sexual harassment, which is defined as unwanted sexual attention. Avinor has zero tolerance for such behavior.

Substance Use

It is not permitted to be under the influence of alcohol or other intoxicating substances at work or to be absent due to substance use.

Sexual Services

Avinor has zero tolerance for the purchase of sexual services. This also applies during business trips abroad.

Use of Company Equipment and Property

All employees at Avinor are obligated to take good care of Avinor's fixed assets and property. Equipment and assets must be protected against misuse, loss, and theft. IT equipment, materials, and other assets should primarily be used for work-related purposes or activities relevant to the job. The use of Avinor's equipment for purposes that may be perceived as offensive is not permitted.

Loyalty

At Avinor, openness and loyalty to the company's interests, framework conditions, and the realization of goals and strategies are required. Employees are expected to use their expertise and position to ensure good processes, including expressing and listening to disagreements before decisions are made. Once decisions are made, loyalty to them is expected. In interactions with external parties, employees must act professionally and remain loyal to Avinor as their employer.

Confidentiality

All employees are bound by confidentiality regarding the business or personal matters of Avinor's customers, employees, and others that they become aware of as part of their employment. Confidential information received in connection with handling cases must be respected and must not be shared outside Avinor without specific permission from a superior. All employees must sign a confidentiality agreement upon employment.

The duty of confidentiality also applies after the individual has left their position, assignment, or role. The information may not be used for personal business or in service or work for others.

Impartiality

An employee is disqualified from preparing the basis for a decision or making a decision in a case if they are personally involved, are related (cf. Section 6, first paragraph, letter b of the Public Administration Act) to or married/cohabiting with someone involved, or if there are other specific circumstances that could undermine confidence in their impartiality. It can sometimes be difficult to determine whether a conflict of interest exists. In case of doubt, the issue must be discussed with the immediate superior. If a superior is disqualified, the decision cannot be made by a direct subordinate (cf. Section 6, third paragraph of the Public Administration Act).

Secondary Employment

Employees must be transparent and inform Avinor about any work performed for another employer, including as a self-employed individual. Employees must not hold board positions, ownership interests, or work for/operate another business (secondary employment) if this could raise doubts about the employee's or Avinor's integrity, loyalty, impartiality, or the ability to perform their duties responsibly. If there is doubt about whether board positions, secondary employment, or paid/unpaid assignments conflict with the employee's duty of loyalty, impartiality, or responsible performance of duties, this must be discussed with the immediate superior.

Employees are obligated to familiarize themselves with and remain loyal to Avinor's values, leadership principles, and ethical rules.

Conflict of Interest

An employee must never participate in or attempt to influence a decision if there is a conflict of interest or if their impartiality could be questioned. Bribery occurs when someone attempts to influence another in the performance of their duties by offering an undue advantage. Such an undue advantage can take many forms, such as cash, gifts, credits, discounts, travel, accommodation, or services. If such a conflict of interest arises, the employee must always inform their manager. Conflicts of interest may involve, but are not limited to, customers, contractors, suppliers, employees, competitors, or employees' business activities outside of Avinor.

The agenda for meetings of the corporate board, the board of Avinor Flysikring AS, and the corporate management team must normally include a role overview for each member. Each member is responsible for assessing potential conflicts of interest related to the matters being discussed in the meetings. It must be documented in the minutes of relevant meetings that these assessments are conducted at least four times a year.

Insider Trading

Insider information refers to precise information that is likely to significantly influence the price of financial instruments and is not publicly available or widely known in the market. Insider information must be handled with particular care, and the number of individuals who receive such information must be kept to a minimum.

Trading in securities must not be conducted if it conflicts with the interests the employee or board member is tasked with safeguarding in their work for Avinor or Avinor's business partners, or if such trading could harm public trust in Avinor.

RULES FOR SUSTAINABLE BUSINESS PRACTICES

Relations with Our Business Partners

Avinor shall act ethically and responsibly in procurement processes and in collaboration with business partners both nationally and internationally, adhering to the Public Procurement Act. Corruption, bribery, and anti-competitive behavior that violates competition laws are not tolerated. Avinor shall engage with business partners and other collaborators with transparency, accountability, respect, integrity, and objectivity.

In interactions with business partners, Avinor's ethical guidelines shall serve as the foundation. You may refer to these guidelines when appropriate. For suppliers and other contractual partners, specific agreements on responsible business conduct have been developed.

Fair Competition

Avinor shall compete in a fair, respectable, and ethically responsible manner within the framework of procurement and competition laws. Abuse of a dominant position is prohibited. Employees at Avinor must not participate in or attempt to influence a procurement process if they have a personal interest in the procurement, whether financial or otherwise, directly or through close relations or other individuals.

Combating Corruption and Misconduct

Avinor has zero tolerance for corruption. Corruption is the abuse of power for personal gain. Corruption threatens the rule of law, democracy, and human rights, undermines good governance and social justice, distorts competition, hinders economic development, and poses a risk to the stability of democratic institutions and the moral foundation of society. It damages reputations and exposes companies and individuals to risk.

Avinor places strong emphasis on anti-corruption efforts. We oppose all forms of corruption and will actively work to reduce the risk of corruption occurring within Avinor or in projects Avinor is involved in. We shall not offer, give, accept, or receive, directly or indirectly, bribes or other improper advantages for business or personal gain, either for ourselves or others.

Employees and board members must not use their positions to gain an undue advantage for themselves or others. This also applies in cases where such advantages would not influence their professional actions. Misconduct occurs when an action is taken or omitted to achieve an unjust advantage for oneself, the organization, or others, including both criminal and non-criminal acts.

Gifts

Employees must not, for themselves or others, accept gifts, commissions, services, or other benefits that are intended to or could influence business decisions. This does not include small promotional items or gifts of low value where it is clear that the benefit cannot influence business decisions.

If there is any doubt about whether a gift or benefit can be accepted, the matter must be referred to the immediate supervisor. Gifts to Avinor's business partners may only be given with the consent of a superior and in accordance with good business practices. Gifts must be modest in nature.

Representation and Events

Employees may participate in social gatherings as long as they have a business-related purpose and are connected to Avinor's operations. Exceptions apply to business partners with whom we are in a negotiation situation.

It is important for Avinor's reputation that relationship-building with external parties is conducted in a legal and ethically responsible manner. When suppliers or other businesses offer visits to private companies, trips to exhibitions, etc., it is a prerequisite that Avinor covers all travel and accommodation expenses for its employees. Costs must remain within reasonable limits.

Travel and representation must always be approved by a superior.

Money Laundering

Money laundering can be defined as transforming proceeds from criminal activities into part of the legitimate economy. It is often associated with other types of crime, such as drug trafficking, terrorism, corruption, and tax evasion. Avinor strongly opposes all forms of money laundering and will comply with all applicable anti-money laundering laws and take measures to prevent others from using our financial transactions for money laundering purposes.

Before Avinor enters into a contract, we must ensure that the supplier is legally registered, that we know the ultimate beneficial owners, and that they conduct lawful business. We shall take reasonable measures to prevent and detect illegal forms of payment, thereby ensuring that Avinor's financial transactions are not used for money laundering.

HANDLING OF OBJECTIONABLE CONDITIONS

Communication

At Avinor, we maintain open communication characterized by respect, loyalty, and professionalism, both internally and externally, whether discussing the company or engaging in dialogue with others. Information is handled with the necessary care and in accordance with applicable information security regulations.

Communication regarding specific cases within Avinor must be coordinated with the corporate unit for communication and public affairs and must follow the corporate communication policy and be conducted by employees with designated authority. This ensures Avinor's reputation is protected and the rights of those affected by or interested in Avinor's activities are safeguarded.

Whistleblowing

The company shall foster an open culture where employees can raise issues with their manager or others within the organization. All employees are encouraged to report objectionable conditions, in accordance with Chapter 2A of the Working Environment Act (Whistleblowing). Objectionable conditions, as defined by the Working Environment Act, include matters that violate legal regulations, written ethical guidelines widely supported in society, or issues that may pose a danger to life or health, the climate or environment, corruption or other financial crimes, abuse of authority, unsafe working conditions, or breaches of personal data security. Statements regarding matters that only concern the employee's own situation are not considered whistleblowing unless they fall under the aforementioned conditions.

Employees can report through their immediate manager, union representative, safety representative, or via the internal or external whistleblowing committee. Whistleblowing must be conducted in a responsible manner.

Responsibility and Follow-Up

As an Avinor employee, it is the duty of each individual to read and adhere to the ethical guidelines. Leaders have a particular responsibility to ensure that their own behavior, as well as that of their employees, complies with the regulations.

Violations of the guidelines will result in actions appropriate to the nature and extent of the breach and may have consequences for the employment relationship, including warnings, termination, or dismissal, depending on the severity of the case.

I declare that I have read and understood Avinor's ethical guidelines and my duty to report any potential objectionable conditions.

I declare that I have read and understood Avinor's policy on anti-corruption and misconduct, as well as the consequences of any violations of this policy.

I declare that I have informed Avinor of all my secondary employment and that I will continuously inform them of any changes.

Place/Date:
Name:

3 INTERFACES AND REFERENCES

None.