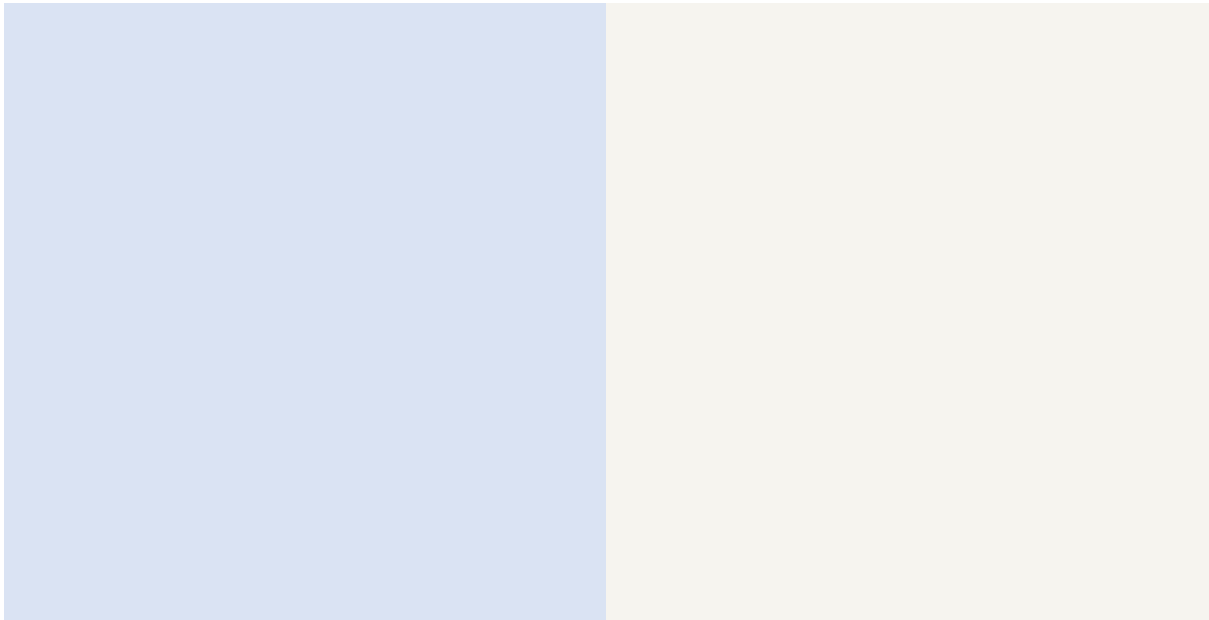


Reitan Retail

# Code of Conduct



REITAN  
RETAIL

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## A message from the CEO

Dear Colleagues

*Our goal is to create the best customer experiences in people's everyday lives and contribute positively to a sustainable future. We are present where people are, close to the customer and local communities, operating efficiently and responsibly. In this way, we create value for local communities, for partners, and not least for the customer - our ultimate boss.*

*While continually strengthening and developing our concepts and values, we are an innovative and responsible trading company that dare to think differently about future trade. We seek to promote solutions for sustainable mobility, reduce climate emissions and food waste, making it easier for customers to make healthy and responsible choices in their everyday lives.*

*Our value-based culture is the cornerstone of our operations. Our culture is based on the REITAN mindset and is outlined in eight values. These values, together with our culture are the foundation for making customers, employees and partners feel valuable, creating financial value and conducting our activities with integrity and responsibility, throughout all our companies in the Nordics and Baltics.*

*Our eight values guide us in how we work:*

- 1. We focus on our business idea*
- 2. We keep a high business moral*
- 3. We are committed to be debt-free*
- 4. We encourage a winning culture*
- 5. We have a positive and proactive mindset*
- 6. We talk with each other, not about each other*
- 7. The customer is our ultimate boss*
- 8. We want our work to be enjoyable and profitable*

*Conducting business in an ethical and transparent manner aligned with our values is essential for us - to inspire trust. We are dependent on trusting each other throughout our organisations, and we are dependent on trust from our customers, suppliers, partners, owners, authorities and from society at large.*

*This Code of Conduct is aligned with our values, and mandatory for everyone who works on behalf of Reitan Retail and our subsidiaries.*

*Integrity starts with each one of us, and we are all responsible for complying with the ethical business practises outlined in this Code of Conduct – Together, we make everyday life a little easier and the world a little better.*

Ole Robert Reitan  
CEO, Reitan Retail AS

## 1 About Reitan Retail

Reitan Retail comprises the business areas Uno-X Mobility, Reitan Convenience, REMA 1000 Norge and REMA 1000 Danmark. We are a leading retail company in the Nordic and Baltic countries, and operate within the grocery, convenience and mobility sector in Norway, Sweden, Denmark, Finland, Latvia, Estonia and Lithuania.

In our business activity, Reitan Retail will comply with applicable laws, act in a sustainable, social and ethically responsible manner. Reitan Retail will conduct its business consistently with the Ten Principles of the United Nations' (UN) Global Compact, the International Labour Organisation (ILO) and the OECD Guidelines for Responsible Business Conduct. Further, Reitan Retail supports the UN Sustainability Development Goals.

This Code of Conduct (the “**Code**”) applies, regardless of location, to all employees as well as to all franchisees, temporary personnel, consultants, and others who act on behalf of or represent Reitan Retail or its subsidiaries, and to the members of the Board of Directors of Reitan Retail. All the above mentioned are expected to conduct business with integrity and transparency and to demonstrate commitment to the highest ethical standards in your dealings with customers, business partners, colleagues, and society at large. Securing continued trust to our businesses from all stakeholders. The CEO of each company is responsible for implementing this Code of Conduct, or a corresponding CoC in each company.

## 2 Upholding this Code of Conduct

This Code of Conduct is approved by the Board of Directors of Reitan Retail AS. The Board of Directors and CEO of each subsidiary is responsible for the implementation and compliance of the Code. Managers at all levels have a particular responsibility to ensure that employees and relevant third parties are informed and have understood the contents of the Code, internal policies and guidelines. In addition, managers at all levels have the responsibility to ensure that activities in their area of responsibility are carried out in accordance with the foregoing and applicable law.

All subsidiaries, as employers, are responsible for providing their employees with information which is necessary to carry out their tasks and responsibilities. At the same time, all employees have a responsibility to ensure their understanding of and compliance with applicable laws and regulations, as well as this Code and the subsidiaries' internal policies and guidelines.

Potential misconduct may be investigated by internal or external experts, and we will pursue remedial measures in the event an employee breaches the law or this Code.

## 3 Human rights

Reitan Retail respects and actively protects workers' right to fundamental human rights and decent working conditions. We follow the UN Guiding Principles on Business and Human Rights which sets forth the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity.

## 4 Safety and security

Protecting the health and safety of our employees is a top priority, and Reitan Retail has a zero-harm ambition with respect to both people and the environment. We are committed to providing a safe, healthy, and secure environment for all workers at our job sites, preventing accidents and incidents from affecting people, the environment, and our assets. Therefore, our subsidiaries have internal EHS policies and exercise sound judgement in their work.

## 5 Drugs and alcohol

It is prohibited to consume alcohol and other intoxicating substances during working hours at Reitan Retail. However, consumption of limited amounts of alcohol served as part of corporate hospitality or company events may be approved on an exceptional basis, provided that the consumption is not combined with operating machinery, driving or any other work-related tasks that is incompatible with the consumption of alcohol.

## 6 Equality, Diversity, and Inclusion

Reitan Retail strives for an inclusive working environment, characterised by diversity and equality. Therefore, Reitan Retail personnel are expected to treat colleagues, customers, business partners and others with respect, particularly regarding cultural differences. Employees shall not engage in any form of harassment or other behaviour which could be perceived as offensive, threatening or degrading, including any form of unwanted attention of a sexual nature. Reitan Retail has a zero-tolerance policy for discrimination. This includes, but is not limited to any unequal treatment, preference or exclusion based on age, gender identity or expression, disability, sexual orientation, ethnicity, political or religious belief or any other individual characteristics.

Reitan Retail respect every employee's right to freedom of association. We respect the rights of employees to join, form, or not to join an association of their choice without fear of reprisal, interference, intimidation, or harassment.

## 7 Legal Compliance and Business Ethics

Reitan Retail and our subsidiaries are obliged and committed to conduct our business within the framework of applicable laws in the countries in which we operate, as well as this Code and internal policies and guidelines. In areas where this Code sets standards higher than national legislation, the Codes shall apply, provided that the Code does not conflict with national laws. Local customs or practices may never take precedence over Reitan Retail's standards, and Reitan Retail's operations shall never be conducted in an illegal or unethical way.

## 8 Anti-Corruption and Anti-Money Laundering

Reitan Retail do not tolerate any form of bribery, corruption, and money laundering in any form. Corruption and money laundering undermine legitimate business activities, distorts competition, could entail imprisonment and other civil and criminal liability,

and prevents the realisation of human rights. Therefore, Reitan Retail shall always be compliant with applicable anti-corruption and anti-money laundering laws, and must not offer, nor accept anything that could call into question the company's professionalism and ethical way of conducting business. Gifts and hospitality are only offered or accepted when they are of a modest value and serve a clear professional purpose. Gifts and hospitality of high value are declined. These standards apply to the Reitan Retail companies, as well as to all employees, franchisees and persons representing our companies.

## 9 Privacy, competition and confidentiality

We are committed to protecting the right to privacy of our employees, customers, and others with whom we do business, as well as the confidential nature of many of our business relationships.

- *Personal data protection:* Reitan Retail recognise the responsibility to protect and safeguard the personal data of our customers, employees and other relevant third parties. Reitan Retail and our subsidiaries shall process personal data with respect, confidentiality, ethically, honestly, with integrity and always compliant with applicable laws and regulations, including the GDPR.
- *Fair competition and honest marketing:* Reitan Retail shall always respect and be compliant with laws regarding antitrust, competition and marketing. We will not enter into agreements or arrangements with competitors which would violate applicable competition law, or otherwise behave in a manner that undermines fair competition. All marketing shall be honest and accountable.
- *Confidentiality:* Reitan Retail's business and operational information are valuable assets in our highly competitive business markets. It is of outmost importance to protect this information. Reitan Retail personnel with access to confidential information regarding Reitan Retail or third parties (e.g. contracting parties) shall safeguard the information in accordance with our internal confidential information policies, in line with our suppliers and business partners interests, and always in compliance with contractual obligations, applicable laws and regulations. Such information may be financial information, business plans, supplier classification, benchmarks, information about employees, customers, partners (and other contracting parties) and other types of sensitive information.

## 10 Financial and Business Records and Reporting

Reitan Retail is committed to correct and accurate accounting and reporting in accordance with applicable legislation and standards in each country. This is essential for the company's credibility and reputation. All transactions are fully and accurately documented and recorded in accordance with applicable laws and generally accepted accounting principles. False or misleading entries can be treated as fraud and are never acceptable.

## 11 Transfer pricing

Transactions within Reitan Retail or between a Reitan Retail company and a shareholder shall be agreed and completed at arms' length terms (transfer pricing). Consequently, the same standards shall in this respect apply between Reitan Retail companies, as between a Reitan company and a third party not affiliated with Reitan Retail.

## 12 Neutrality

Reitan Retail observes neutrality with regards to political parties and candidates. Company names, company owned trademarks or assets related to companies within Reitan Retail shall not be used to promote nor discredit the interests of political parties or candidates.

No Reitan Retail employee or representative shall make decisions or engage in activities related to Retail Retail, based on personal interests.

## 13 Our Suppliers and Business Partners

Reitan Retail expect all our business partners to comply with applicable laws and our Supplier Code of Conduct (or if applicable the Supplier Code of Conduct of the Reitan Retail company entering into an agreement with the business partner), and to respect internationally recognised human rights and ethical standards. Our business partners include suppliers, distributors, agents, consultants, contractors, joint venture partners and others Reitan Retail conducts business with.

Managers at every level is responsible for ensuring that Reitan Retail's business partners are informed of and understand our Supplier Code of Conduct. Reitan Retail is committed to only working with parties that fulfil these requirements. Reitan Retail reserves the right to terminate the business relationship if the company in question fails to comply with these requirements.

## 14 Sustainability

The needs of the planet and customers are rapidly evolving. At Reitan Retail we can and should make a difference. Our ambition is to spearhead the green transition in our markets, and we have outlined four material focus areas in our ESG strategy: Health, Environment, People and Value chain.

**Health** - Our customers must be confident that we care about their health and wellbeing. We will inspire more people to make healthier and more sustainable choices through our products, services, and sponsorship work. There is great potential for us to contribute in this area. Good health is an absolute prerequisite if people are to reach their full potential and help improve society.

**Environment** - We will become climate-neutral, help our customers make responsible choices and contribute to the establishment of a more sustainable value chain that helps to protect and preserve nature.

**People** - Showing confidence in people is a key element of our culture at Reitan Retail. For us, diversity means success. We are a model inclusive workplace in terms of gender, ethnicity, age and background, and allow everyone to succeed.

**Value chain** - Ethical trading and production are high priorities for Reitan Retail. Our customers must be confident that the products we sell have been manufactured and sourced responsibly. We must maintain a high level of business ethics and commit ourselves to work with suppliers to prevent and limit negative impacts on people, the environment and society.

We seek to maintain transparency and accountability, by disclosing our progress on these topics, together with measures taken and planned in Our Responsibility which will be published yearly.

## 15 Report your concerns

Reitan Retail is a value-based business, where openness is central. We have an open communication policy, and welcome being notified by anyone of conduct they perceive as unethical.

If you are an employee of Reitan Retail and suspect a possible violation of the Code or other unethical conduct, it is your duty to report this immediately. Any possible violations or other unethical conduct can be reported to your manager, their manager's manager, or the company's whistleblowing channel (<https://www.reitanretail.no/en/responsibility/whistleblowing>). The whistle-blower can choose to be anonymous.

Reitan Retail prohibits any form of retaliation against an employee for making a good faith report of misconduct.





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