



GATEWAY STAINLESS SUPPLIER CODE OF CONDUCT

Gateway believes in conducting a socially responsible business. Promoting decent working and environmental conditions in our supply chains is part of our company's strategy and efforts to act responsibly. In pursuit of this aim we wish to cooperate closely with our suppliers and business partners.

The board of Gateway has adopted the UN's Global Compact ten principles to clarify what we expect and require of ourselves and our business partners. The UN Global Compacts ten principles serve as the overarching framework for the Code of Conduct suppliers to Gateway are expected to strive to achieve. The twelve points in this code of conduct is a concretization of the UN Global Compact ten principles.

The code of conduct is based on internationally acclaimed conventions and norms which are embodied in national laws and regulations. If, however, national governance is weak – Gateway still expects suppliers to comply with the code of conduct and strive towards best practice within its industry.

1. Management systems

- Suppliers shall implement and maintain systems for delivering compliance to this Code of Conduct.
- Suppliers are expected to communicate the code to their own organization and suppliers.
- Suppliers should extend this code of conduct through their own supply chains.

2. Forced labour

- There shall be no forced, bonded or involuntary labour (including involuntary prison labour).
- Workers should not be required to lodge deposits or identity papers with their employers.
- Employees are free to leave their employers after reasonable notice.

3. Freedom of Association and Collective Bargaining

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- Workers' representatives shall not be discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate(s), and does not hinder, the development of parallel means for independent and free association and bargaining.



4. Child Labour & Young Workers

- There shall be no recruitment of child labour or employment of persons younger than approved by national law.
- Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- Young workers above legal age, but under 18 shall not be employed at night or in hazardous conditions.
- Effective abolition of child labour is underpinned by the International Labour Organization's Convention Minimum Age Convention NO. 138 and Worst Forms of Child Labour Convention No. 182. Gateway expects of its suppliers and business partners to recognize and acknowledge the above-mentioned conventions.

5. Discrimination

- There shall not be discrimination in the hiring process regarding, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

6. Health & Safety

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers
- Access to clean toilet facilities and to potable water shall be provided, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and at least meet the basic needs of the workers.

7. Living wage/minimum wage

- Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- All overtime shall be reimbursed at a premium rate as defined by national law.
- Social insurance must follow local legal requirement.
- Paid leave must be in compliance with local legal requirement.

8. Working Hours

- Working hours shall comply with national laws and benchmark industry standards, whichever affords greater protection.

- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

9. Regular Employment

- Work performed must be through recognized employment relationships established through national law and practice.
- Sub-contracting, home-working arrangements and labour-only contracts shall not be used to avoid obligations for employees as stated in labour and social security law.
- Obligations to employees shall not be avoided through excessive use of fixed-term employment contracts.
- There should be no subcontracting unless agreed with the Gateway.
- Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

10. Discipline/Inhumane treatment

- The supplier shall promote a healthy working environment, where intimidations, such as verbal abuse, threats, sexual harassment or other types of harassment or other forms of intimidation do not occur.

11. Environment

- The supplier shall comply with environmental regulations and laws.
- The supplier is encouraged to reduce green-house gas emissions in their product life-cycle and take precautionary approach to environmental challenges.

12. Corruption and Bribery

- The suppliers shall have established and follow anti-corruption guidelines to prevent the occurrence of bribery and corruption.
- Employees (including managers) shall not directly or indirectly offer, promise, demand, require or accept illegal or unlawful monetary gifts or other forms of compensation in order to gain commercial advantages or benefits except from gifts or benefits of insignificant values.

Contacts:

Any questions related to this Code of Conduct can be addressed to the relevant Manager at Gateway Stainless AS