

CODE OF CONDUCT & ETHICS

1. Introduction

The goal of ACAPO AS ("Acapo") is to be the preferred provider of advice on intellectual property matters in Norway. In order to offer our customers, the best possible service, Acapo has built its culture on equality, openness, and cooperation, and we now want to ensure that our key ethical values are safeguarded by our subcontractors. Acapo emphasizes ethical business conduct in the provision of its services, and we expect our suppliers and their subcontractors to do the same. Acapo's ethical guidelines are therefore necessary in order to ensure that Acapo can act in a professional and ethically responsible manner towards customers, suppliers, authorities, employees, and colleagues.

It is expected that those associated with Acapo act in accordance with applicable laws and regulations, and in accordance with this Supplier Code of Conduct.

2. Purpose

The purpose of this Code of Conduct is to ensure that Acapo's suppliers and, in turn, their subcontractors have a conscious and committed relationship to the company's ethical requirements.

Our Suppliers and Contract Partners shall act in accordance with Acapo's core values, meaning that they must respect basic human rights and labor rights. They shall also conduct their business in a manner that is environmentally sustainable.

Goods and services supplied to Acapo shall be produced and provided under conditions that are compatible with the requirements set out below. These requirements are based on central UN conventions, ILO conventions and national labor legislation at the place of production. According to the UN Guiding Principles on Business and Human Rights (UN GP), companies have an independent responsibility to respect internationally recognized human rights and ILO core conventions (Principle 12).

Suppliers are responsible for their own compliance with the ethical requirements and are obliged to ensure that their subcontractors are made aware of these ethical requirements and also comply with them.

3. Requirements for Compliance with Fundamental Human Rights and Decent Working Conditions

Acapo supports and respects fundamental human rights and the right to decent working conditions, as set out in international conventions, in respect of all its activities.

Suppliers shall actively support, and respect internationally recognized human rights as set out in the UN Covenant on Economic, Social and Cultural Rights of 1966, the UN Covenant on Civil and Political Rights of 1966, the European Convention on Human Rights of 1950, and the ILO (International Labour Organization) Fundamental Conventions on fundamental rights and principles at work. Suppliers shall also ensure that they are not directly or indirectly involved in human rights violations.

Suppliers shall comply with the ILO's fundamental conventions, including ensuring that:

- There is no forced, compulsory, or involuntary labor of any kind (ILO conventions no. 29 and 105)
- Suppliers acknowledge their employees Freedom of Association and right to organize, and do not oppose, deny, or discriminate against trade union organization or collective bargaining activity (ILO conventions no. 87, 98, 135 and 154)
- There is no child labor (UN Convention on the Rights of the Child, ILO conventions no. 138, 182 and 79, ILO recommendation no. 146)
- There is no discrimination based on ethnicity, caste, religion, age, disability, gender, marital status, sexual orientation, trade union membership, or political affiliation (ILO conventions no. 100 and 111 and the UN Convention on the Elimination of All Forms of Discrimination against Women)
- Torture or cruel, inhuman, or degrading treatment does not occur (UN Covenant on Civil and Political Rights, art. 7)
- Workers enjoy a working environment in which health, safety, and environmental sustainability are safeguarded (ILO Convention No. 155 and Recommendation No. 164)
- Wages and working hours are in accordance with national regulations and the minimum standards in ILO conventions no. 1, 14 and 131.
- Labor contracts and obligations to employees set out in national standards and ILO conventions are observed, including those relating to the use of temporary employment (ILO conventions no. 95, 158, 175, 177, 181)
 - Production and use of natural resources does not contribute to the destruction of the resource and income base of marginalized population groups (UN Covenant on Civil and Political Rights, art. 1 and 2)

Acapo's suppliers shall consistently identify subcontractors in relation to which there is an underlying risk of violations of human rights and decent working conditions and shall implement the appropriate preventative measures. Acapo expects its suppliers to implement corrective measures if they become aware of any human rights violations by the supplier's subcontractors.

4. Environment

Measures to reduce negative effects on the climate and the environment throughout the value chain shall be implemented. These will include minimizing emissions, promoting efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport.

National and international environmental legislation and regulations shall be complied with, and relevant emissions permits shall be obtained.

5. Corruption

All forms of corruption and bribery, including offers of improper payments to or from employees or other representatives, are unacceptable. This also applies to the use of alternative channels to secure illegitimate private or work-related benefits to customers, agents, contractors, suppliers or their employees, and public officials.

Suppliers shall establish and maintain policies and procedures to prevent bribery and corruption.

6. Inspections and Reports

Acapo may require documentation confirming that the ethical requirements set out herein are complied with. If Acapo has a concrete suspicion of a breach of these ethical requirements related to a subcontractor of the Supplier, the Supplier shall prepare a due diligence assessment at Acapo's request.



The Supplier undertakes to provide any relevant and necessary documentation as requested by Acapo.

Our suppliers shall have systems and routines in place for handling complaints related to human rights, labor rights, environmental sustainability, and corruption. The Supplier shall ensure that workers and external parties, such as local communities and civil society organizations, can submit such complaints.

If the Supplier becomes aware of circumstances which violate these ethical conditions, the Supplier shall report this to Acapo without undue delay.

7. Consequences of Breach

If the parties discover deviations from Acapo's ethical terms during the contract period the parties may agree, depending on the severity of the deviation, a deadline for when the matter must be rectified.

Breach of these ethical terms by the supplier or subcontractor may be considered a material breach of the contract. Such a breach entitles Acapo to terminate the contract unilaterally.
