

Ethical Guidelines for the Norwegian Seafood Council

Approved by the NSC board 19.06.18

Foreword

It is the ambition of the Norwegian Seafood Council to represent best practices in our business ethics, ethical standards and in the way that we apply these principles to our work.

All employees are obliged to contribute to the Norwegian Seafood Council's reputation as a responsible and professional business entity and to ensure that the company upholds a good reputation for our owners and our clients and stakeholders; the seafood industry and the outside world. Employees must actively contribute to the promotion of open and truthful communications and maintain good working relationships both internally and externally.

In the interests of promoting a culture of openness, we are therefore publishing the ethical guidelines that govern our operational environment.

The essence of our ethical guidelines are the following principles:

- Zero tolerance for corruption
- No unreasonable discriminatory treatment
- Safeguarding the integrity of the individual employee

All employees and union representatives in the Norwegian Seafood Council are responsible for compliance with the ethical guidelines. We wish to learn from our mistakes, and therefore we encourage both internal and external stakeholders to report any and all critical circumstances.

Tromsø,

Renate Larsen

1. Introduction

The Norwegian Seafood Council is a publicly owned organisation and is the fisheries industry's jointly-held organization for market development. This means that the Norwegian Seafood Council's employees act on behalf of others and manage finances on behalf of a community. This brings with it strict requirements for integrity.

These guidelines have been adopted by the Board of the Norwegian Seafood Council and define a minimum standard of ethical behavior for all employees and representatives of the Norwegian Seafood Council.

1.1. Scope and responsibility

The ethical guidelines apply to all employees; both full-time and part-time employees, interns, temporary staff and consultants representing the Norwegian Seafood Council. The guidelines also apply to members of the governing bodies when they perform their duties in the Norwegian Seafood Council.

The Norwegian Seafood Council expects suppliers to comply with the same ethical standards as our own employees.

Irrespective of where you perform your business, employees in the Norwegian Seafood Council shall comply with Norwegian laws, laws and regulations in force in the country in which the employee is resident, contractual obligations, internationally recognized human rights and the requirements of good business practice and recognized standards of personal conduct.

2. Personal conduct

The Norwegian seafood council's employees shall act in such a way that it entrusts trust and respect for business associates, colleagues and others whom they come into contact with in connection with their work.

The Norwegian Seafood Council's employees shall avoid putting themselves in situations where there may be doubt about their independence. Employees in decision-making positions, or with a strong opportunity to influence a decision, are particularly prone to speculation about their objectivity. Openness about assessments, the weighing of decisions and prioritisation is an important principle in the Norwegian Seafood Council.

The Norwegian Seafood Council does not accept harassment or other behavior that can be perceived as threatening or degrading.

Our employees must abstain from the use of intoxicants in a way that can make themselves, the Norwegian Seafood Council or the Norwegian Seafood Council's business associations appear in an unflattering or questionable light.

No one shall be treated unreasonably differently due to gender, age, religion, political opinion, race, color, national origin, ethnic origin, sexual orientation or form of cohabitation.

3. Corruption and business ethics

3.1. Corruption

The Norwegian Seafood Council has zero tolerance for corruption.

Corruption means to offer, claim or receive an undue advantage in the event of an appointment, office or mission. There is also a ban on giving / offering or requiring / accepting / accepting an undue advantage to affect another person's performance of a post, job or assignment. The expression "undue advantage" encompasses both economic and non-economic benefits.

Employees shall not offer or receive remuneration, services, commissions or other benefits that can affect a business relationship

3.2. Gifts, entertainment and representation

In general, employees should exercise caution in the receipt of benefits in connection with the employment relationship that may lead to questions about their impartiality or which may inadvertently affect their decisions.

The development of long-term relationships with partners and suppliers must ensure that ties do not become so close that suppliers cannot be replaced when this is necessary for business reasons. Higher levels of care must be exercised during periods when contracts are becoming due for award or renewal.

The individual is responsible for gifts or benefits, such as bonus points, received as part of the employee's duties or assignments associated with the employment relationship, shall be reported to the Norwegian Seafood Council in accordance with applicable tax rules.

Employees shall not, either for themselves or on behalf of others, receive - or facilitate to receive - gifts, travel, hotel accommodation, promotional gifts, commissions, discounts, loans or other benefits that may be considered inappropriate, or where the donor may be viewed as an influence on the manner in which the employee carries out their work.

This does not apply to promotional gifts, conferences or similar with a value of less than NOK 500, discounts for employees which follow a written agreement signed by the employer and applicable to all employees and in situations where it is obvious that the performance will not affect the employee's work.

Promotional gifts worth more than NOK 500, must be reported by the employee to their manager and returned to the sender. In cases where cultural considerations should be taken into account in relation to local market operations, it may be appropriate to receive the gift. In such cases, the gift shall be made to the Norwegian Seafood Council and not the individual employee, and shall be reported to the nearest line manager in the usual manner.

3.3. Political contributions

The Norwegian Seafood Council shall not engage in the financing of political causes. Exceptions to this are at the sole discretion of the Board of the Norwegian Seafood Council.

3.4. Insider trading

Employees in the Norwegian Seafood Council may not own shares or other interests in enterprises in the fisheries and aquaculture industries. Exceptions to this are at the sole discretion of the Board of the Norwegian Seafood Council.

All employees in the Seafood Council must register their and their relatives financial interests and obligations in an internal register.

Employees of the Norwegian Seafood Council may not utilize inside information he or she becomes privy to for their own benefit.

3.5. Impartiality and conflicts of interest

Employees of the Norwegian Seafood Council shall inform their manager immediately they become aware of a potential conflict of interest. A challenge to impartiality may arise through a relationship which can undermine confidence in an employee's objectivity. The employee deemed to have a conflict of interest shall immediately terminate his affiliation with the case.

3.6 Confidentiality

Throughout the term of employment, complete confidentiality applies to all confidential company information as well as other technical, administrative and business issues that the employee becomes acquainted with during the course of their work in the Norwegian Seafood Council. Confidentiality also applies after the employee has left the organisation. New employees sign a non-disclosure statement as part of their employment agreement.

3.7 External work and roles

Employees may not hold additional positions or perform any other significant paid work, if this could imply a challenge to their impartiality and to the objectivity of the Norwegian Seafood Council. Employees are obliged to declare any external work and roles to their line manager.

3.8 Assignments for the Norwegian Seafood Council

Salary from the Norwegian Seafood Council is compensation for all work carried out for the Norwegian Seafood Council. Where an employee receives financial compensation from an external employer for work carried out as a Norwegian Seafood Council employee, this compensation accrues to the Norwegian Seafood Council.

Employees of the Norwegian Seafood Council are allowed to serve on a board of directors if this does not create a conflict of interest or take up an unreasonable amount of time. These must be approved by the Norwegian Seafood Council. Directors fees for board roles accrue to the employee.

4. Privacy, information security and confidentiality

The Norwegian Seafood Council is committed to handling personal data with all due care and integrity. The utmost care and caution is exercised with respect to who has access to information, how it is to be shared, and in ensuring that unauthorized persons are not able to access confidential information.

Confidentiality shall prevent unauthorized access to information that may harm the Norwegian Seafood Council, our customers and partners. This duty extends to the protection of the privacy and integrity of the employees and employees.

5. Information technology

Employees have access to computers and smartphones that are used actively in communication both in work and in private contexts. Use of email, the internet and social media creates a permanent record and therefore caution should be exercised regarding what is written, read and forwarded. The Norwegian Seafood Council's technical equipment, networks and servers or storage media shall not be used for the storage, spread or preparation of illegal or infringing content of any kind.

6. Social media

Facebook, Twitter, Instagram, YouTube, Snapchat and other social media are a significant part of everyday life for many of our employees. Although our employees use these channels as private individuals, many will be linked to their employment in the Norwegian Seafood Council. The employee is responsible for all content posted on the web, either in a blog, in social networks, in commentary in online newspapers or other user-generated media. Our employees are reminded that they should respect their audience and remember that what they post will be available as an online record for many years to come. Employees are expected to show common decency to other users, refrain from making or promoting discriminatory statements, making personal attacks, using obscenity or other behavior that would be unacceptable in the workplace.

The use of social media in working hours is a matter of trust. It is assumed that the use of social media does not impinge upon work performance.

7. Notice of critical relationships

The Norwegian Seafood Council encourage both their own employees (ref. [Working Environment Act § 2-4.](#)) and external parties to give notice of any critical relationships. The giving of notice is protected from reprisals or the threat of reprisals under the [Working Environment Act § 2-5.](#)

Critical relationships mean breaches of laws, guidelines, generally accepted norms and ethical rules. Examples of critical relationships include corruption and financial fraud, bullying, harassment, discrimination, substance abuse or other conditions that are irregular or inappropriate.

Who should be notified:

Notification can be made directly to the Norwegian Seafood Council, to our CEO, to an employee's nearest manager, trustee or safety representative. These persons should be kept up to date on internal reporting procedures.

Notice from external parties can also be made to the Norwegian Seafood Council's whistleblower at www.seafood.no.