

CORPORATE SOCIAL RESPONSIBILITY POLICY

SCANDZA AS

1. INTRODUCTION

This corporate social responsibility (**CSR Policy**) is adopted by the Board of Directors (**Board**) of Scandza AS (**Scandza** or the **Company**) and implemented by each of its direct and indirect subsidiaries (hereinafter jointly referred to as the **Group**).

This CSR Policy comprises the Company's expectations towards its employees, management, officers, and directors referred to as "we" or "our", as well as suppliers, customers, business partners and other third parties (jointly **Business Partners**) in the areas of anti-corruption, health and safety, labor and human rights, animal rights and environment.

We aspire to ensuring that our business is conducted in an ethical, legal, socially, and environmentally responsible manner.

We continually strive to improve within the areas of human rights, animal rights, labor standards and to work against any form of corruption.

Our CSR Policy reflects our respect for universally recognized normative standards such as the United Nations Universal Declaration of Human Rights and the core labor conventions of the International Labor Organization¹.

Scandza is a member of Ethical Trade Norway. This commits us to evaluate and control our suppliers and secure that they uphold laws and regulations and our Scandza standards.

1.1. UN Sustainability goals

Scandza has identified four UN sustainability goals on which the Group will focus attention when conducting business.

- Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture.
- Goal 8: Promote inclusive and sustainable economic growth, employment, and decent work for all.
- Goal 9: Build resilient infrastructure, promote sustainable industrialization, and foster innovation; and
- Goal 12: Ensure sustainable consumption and production patterns.

2. ANTI-CORRUPTION

To achieve sustainable economic growth anti-corruption work is essential. Scandza has a zero-tolerance policy for corrupt behavior.

2.1. Definition

Corruption is the abuse of entrusted power for personal gain, dishonest or illegal behavior particularly by people in leading positions. Dishonest behavior of entrusted power for personal

¹ <https://www.ilo.org/global/lang-en/index.htm>

gain may not always be regarded as criminal behavior as laws and regulations vary between jurisdictions but may still be a violation this CSR Policy.

Corrupt behavior and unacceptable behavior in the Group includes, but is not limited to, the following:

- the improper use of gifts and favors in exchange for personal gain.
- using one's influence with persons of authority to obtain preferential treatment in return for payment.
- nepotism, i.e., favoring someone based on personal relations, such as a family member, friend, or member of a particular association.

2.2. Scandza's anti-corruption policy

The Group shall comply with all applicable laws and regulations to prohibit corruption in our operations.

2.3. Scandza anti-corruption checklist

The Group commits to the following:

2.3.1. Commitment

Scandza shall under no circumstances participate in corruption of any kind. The Group expects all employees, members of management, officers, and directors to report violations of this CSR Policy.

2.3.2. Assessment

Scandza is Norwegian based company with businesses located mainly in the Nordics. All of the Nordic countries are recognized on Transparency International corruption index 2017 for being among the top six countries in the world with respect to anti-corruption. Although corruption is more unlikely to occur in these countries than other places in the world, Scandza is committed to continually assessing the risk of corruption in our business and supply chain.

2.3.3. Plan

Those who believe a violation of this CSR Policy may have occurred or may be likely to occur are expected to report the concern, either internally to the VP General Counsel, or anonymously through Scandza's whistleblower system (described in a separate, dedicated policy). All employees in the Group can report through the whistleblower system.

Scandza provides employees with channels to report complaints or concerns. All persons involved in processing complaints are responsible for ensuring that the person involved does not suffer prejudice or retaliation because of submitting a complaint. All complaints must be investigated and, if appropriate, preventive, corrective, and disciplinary actions must be taken.

2.3.4. Act

Scandza representatives at any level who fail to comply with this CSR Policy or to support guidelines and procedures or relevant legislation will be subject to internal disciplinary action, which may result in termination of their contract.

2.3.5. Monitoring

The Board will review and evaluate the anti-corruption work in the Group on an annual basis.

3. HEALTH AND SAFETY

Health and safety have several aspects to the Group, both occupational health and safety and the health and safety of consumers.

3.1. Occupational health and safety

Scandza is committed to properly assessing and managing potential risks to the health and safety of all our employees, contractors and visitors, and anyone else who may be directly affected by our business operations.

To reduce health and safety risks, the Group specifically aims to

- a) promote awareness through education and training,
- b) maintain proactive emergency preparedness and response; and
- c) measure and evaluate health and safety performance through regular audits, inspections and internal reporting.

Scandza has quality management systems where all unwanted incidents are reported, evaluated, and improved.

3.2. The health and safety of consumers

All production lines of the Group have BRC (or equal) certification. Hazard analysis and critical control points based on the Codex Alimentarius² are at the core of our quality system.

4. LABOUR AND HUMAN RIGHTS

Scandza is committed to providing a safe environment for all its employees and has a policy of zero tolerance towards the discrimination of any employee or job applicant based on an individual's race, color, religion, sex, sexual orientation, nationality, age, disability, or any attribute protected by national or international laws. This policy applies to all stages of employment.

4.1. Respectful Disciplinary Actions

Disciplinary actions in the Group shall comply with applicable laws, regulations, and business standards. Disciplinary actions shall fully respect an employee's basic rights and dignity.

4.2. Proactive Measures

The Group shall offer parental leave to strengthen the protection of workers with family responsibilities.

4.3. Sexual harassment

The Group operates a zero-tolerance policy towards any form of sexual harassment in the workplace, treats all incidents seriously and will promptly investigate all allegations of sexual harassment.

Any person found to have sexually harassed another will face disciplinary action, which may include termination of their employment. All complaints of sexual harassment will be taken seriously and treated with respect.

4.4. Forced labor

Scandza strictly prohibits the use of forced labor and human trafficking in all company operations and in our global supply chain.

² FAO and WHO international food standards

This CSR Policy demonstrates a commitment within the Group to mitigate any risk of slavery or human trafficking in our operations or within the supply chain.

To support honesty and integrity we provide our staff with the opportunity to report any concerns they may have regarding slavery and human trafficking through a confidential whistleblower system.

4.5. Child labor

The Group does not employ any person below the legal minimum age for employment. We also have a policy of zero tolerance against breach.

4.6. Work-life balance

The Group promotes a healthy work-life balance for all our employees. The Group will comply with all laws and regulations regarding both normal working hours and overtime.

We encourage all employees, male and female, to take the maximum parental leave prescribed by law.

4.7. Compensation

Scandza observes the statutory minimum wage set by the government of the country in which it has local operations. Where this is not sufficient to meet basic needs, we strive to compensate employees with remuneration that allows for an adequate standard of living. We maintain a remuneration policy that emphasizes the internal equity and external comparability within a defined labor market. The key elements within the Group's remuneration and rewards policy are pay for responsibility and pay for performance.

4.8. Freedom of Association and Collective Bargaining

Scandza shall freely allow workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.

Scandza upholds the freedom of association of its employees and the effective recognition of the right to bargain collectively.

4.9. Whistleblower System

All employees in the Group can report complaints or concerns through our whistleblower system, WhistleB <https://report.whistleb.com/scandza>.

5. ANIMAL RIGHTS / ANIMAL WELFARE

Scandza is committed to improve the welfare of animals. Animal welfare is to be respected by all our suppliers. All suppliers must uphold national and international animal welfare regulations.

If our suppliers do not comply with our standards, we are committed to help them reach our standards before we are forced to end the relationship.

6. ENVIRONMENT

Scandza is committed to minimizing the impact of its activities on the environment. The Group will work on minimizing its carbon emissions, reducing food waste and in striving to be a frontrunner in developing environmentally friendly packaging. The Group is committed to minimizing its impact on the local environment.

All companies in the Group shall measure and set reduction goals on carbon emissions, food waste and non-environmental packaging.

7. BUSINESS PARTNERS

Scandza expects full compliance from all its Business Partners regarding areas of anti-corruption, health and safety, labor and human rights, and environment. All suppliers to the Group are expected to sign our supplier standards.

Scandza is committed to continually assessing the risks related to all the topics above concerning our Business Partners.

8. REMEDY

Scandza is obliged to ensure that remedy is provided where harm to employees, animals or the local environment has occurred by us or our suppliers.

9. ANNUAL REVIEW

This CSR Policy is subject to annual review by the Board of Directors.

10. NO RIGHTS CREATED

This CSR Policy is a statement of fundamentals to Scandza's principles and culture. It does not create any rights for any third party, such as customers, suppliers, competitors, shareholders, regulatory authorities or any other person or entity.

Board of Directors

Scandza AS