

**Policy
for
Corporate Social Responsibility
Scandza Group**

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Introduction

This policy addressing corporate social responsibility (“CSR Policy”) is adopted by the Board of Directors (the “Board”) of Scandza AS (“Scandza”) and implemented by each of its subsidiaries (hereafter jointly referred to as “Scandza Group”).

The CSR Policy contains the expectations towards our employees, members of 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, and environment.

Our aspiration is to ensure that we conduct business in an ethical, legal, socially and environmentally responsible manner.

We continually strive to improve within the areas of human 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 Organization.

UN Sustainability goals

Scandza has identified three UN sustainability goals where we as a group of companies will focus our 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

Anti-corruption

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

Definition

Corruption is the abuse of entrusted power for personal gain, being a dishonest or illegal behavior especially by people in leading positions. Dishonest behavior of entrusted power for personal 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 Scandza Group comprises inter alia the following:

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

Scandza anti-corruption policy

It is the policy of Scandza Group to comply with all applicable laws and regulations prohibiting corruption in our operations.

Scandza anti-corruption check list

Scandza Group commits to the following:

Commitment

Scandza Group shall under no circumstance participate in corruption of any kind. Scandza Group expects all employees, members of management, officers and directors to speak up if a violation of this CSR Policy occurs.

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 happen in these countries than other places in the world, Scandza Group is obligated to constantly assess the risk of corruption in our business and in our supply chain.

Plan

Those who believe a violation of this CSR Policy has occurred or is about to occur are expected to speak up, either internally to their managing director (CEO) or to the General Counsel of Scandza Group, or anonymously through Scandza Group's whistleblower system (described in a separate policy). All employees in Scandza group can report complaints in our whistleblower system.

Scandza provide workers with channels to report complaints. All persons involved in processing complaints are responsible for ensuring that a person does not suffer prejudice or retaliation as a result of submitting a complaint. All complaints must be investigated and appropriate preventive, corrective, and disciplinary actions must be taken.

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, and possibly the termination of their contract.

Monitoring

The Board will annually review and evaluate the anti-corruption work in Scandza Group.

Health and safety

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

Occupational health and safety

Scandza Group is committed to properly assess and manage 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.

In order to reduce health and safety risks, Scandza Group specifically aims to (i) promote awareness through education and training, (ii) maintain proactive emergency preparedness and response, and

(iii) measure and evaluate health and safety performance through regular audits, inspections and internal reporting.

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

The health and safety of consumers

All production lines of Scandza Group has BRC (or equal) certification. Hazard analysis and critical control points based on the Codex Alimentarius¹ are at the core of our quality system.

Labor and Human Rights

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

Respectful Disciplinary Actions

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

Proactive Measures

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

Sexual harassment

Scandza Group will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment.

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

Forced Labor

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

This CSR Policy demonstrates a commitment within Scandza 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.

Child Labour

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

Work life balance

Scandza Group holds high a healthy work life balance for all our employees. Scandza Group will comply with all laws and regulations regarding workhours and overtime.

¹ FAO and WHO international food standards

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

Compensation

Scandza Group observes the statutory minimum wage set by the government of the country in which it has a local operation. Where this is not sufficient to meet basic needs, Scandza Group strives to compensate employees with remuneration that ensures an adequate standard of living. Scandza Group maintains a remuneration policy that emphasizes the internal equity and external comparability within a defined job market. The key elements within Scandza Group's pay and reward policy are: pay for responsibility and pay for performance.

Freedom of Association and Collective Bargaining

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

Whistleblower System

All employees in Scandza Group can report complaints in our whistleblower system.

Environment

Scandza Group is committed to minimizing the impact of its activities on the environment. Scandza Group will work on minimizing its carbon emissions, reduce food waste and be frontrunner in developing environmental friendly packaging. Scandza Group is committed to minimize impact on the local environment.

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

Business Partners

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

Annual revision

This CSR Policy is reviewed annually by the Board.

No rights created

This CSR Policy is a statement of fundamentals to Scandza Group'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.

Adopted by the Board of Directors of Scandza AS on 22 August 2018