

CORPORATE SOCIAL RESPONSIBILITY GUIDELINES

February 2017

The contents of this document apply to Saferoad Holding ASA ("Saferoad") and all its subsidiaries (the "Group"), divisions and regions.

1 INTRODUCTION

1.1 OBJECTIVE

Saferoad Holding ASA ("Saferoad") defines corporate responsibility as achieving commercial profitability in a way that is consistent with fundamental ethical values and with respect for individuals, the environment and society. Saferoad and its subsidiaries (the "Group") shall respect human and labour rights, establish good environmental, health and safety (HSE) standards, facilitate good dialogue with stakeholders and generally operate in accordance with applicable regulatory frameworks and good business practice.

The Group's business depends on the trust of consumers, contractual parties, the authorities, shareholders, employees and society in general. In order to gain trust, the Group is dependent upon professionalism, expertise and high ethical standards in all aspects of the Group's work. These ethical and corporate social responsibility rules (the "CSR Guidelines") are based on Saferoad's Values, ethical guidelines as described in our Code of Conduct set forth the basic principles for business practices and personal behaviour for Saferoad and apply to all employees of the Group, as well as persons/entities holding a position of trust with Saferoad and hired consultants acting on behalf of the Group.

Saferoad has developed separate conduct principles that apply to Saferoad's suppliers.

Saferoad's CSR Guidelines do not give customers, suppliers, competitors, shareholders or other persons or entities any legal rights beyond those that follow from applicable legal regulatory frameworks

2 MAIN PRINCIPLES OF CORPORATE RESPONSIBILITY

Saferoad has identified nine main corporate responsibility topics. The general principles underlying the Group's approach to these topics are described below. Priorities shall be based on an assessment of the needs of both the business and its stakeholders, and be an integral part of Saferoad's risk management model.

2.1 STRONG CORPORATE CULTURE

Saferoad shall strive to promote an open corporate culture that fosters collaboration and is based on Saferoad's Values. In promoting Saferoad's principles for good business operations, we shall respect local values and norms, and achieve success by bridging different cultures and interests. Saferoad companies shall always comply with local regulatory requirements in the countries in which we operate.

Responsible operations require vigilance and the exercise of good judgement on the part of management and employees.

2.2 RESPECT FOR HUMAN AND LABOUR RIGHTS

Saferoad companies shall promote corporate conduct that reflects respect and consideration for others. In its operations Saferoad shall respect fundamental human rights as described in international human rights conventions such as the UN Convention on Human Rights and the labour rights conventions of the International Labour Organization (ILO). Saferoad is committed to respecting fundamental human and labour rights, both in our own internal business and in our relations with business partners, suppliers, customers and others who are directly affected by Saferoad's activities. The Group shall work systematically with important issues as non-discrimination, the right to privacy, the right to negotiate, employment contracts, protection against harassment and management-employee collaboration.

2.3 HEALTH, SAFETY AND ENVIRONMENT (HSE)

Saferoad shall strive to achieve a vision of zero harm to people, the environment and society, and work purposefully and systematically to reduce the environmental impact. The Group's products and services shall always be subject to strict requirements in terms of quality, product safety and impacts on personal health and the environment. Saferoad's goals in this area are described in further detail in the Saferoad HSE Policy.

2.4 ANTI-CORRUPTION

Corruption is the abuse of a position of trust to acquire personal or business benefits. Saferoad does not tolerate corruption, and expects that all leading employees promote a strong anti-corruption culture in their department.

The companies in the Group shall make active efforts to prevent undesirable conduct, and ensure that the employees are capable of dealing with difficult situations. Saferoad's standards and expectations in this area are described in further detail in the Saferoad Compliance Programme.

2.5 RESPONSIBLE MARKETING PRACTICES

Our marketing materials and other representations we make to current or prospective customers must be accurate, truthful and in compliance with applicable laws.

Saferoad does not tolerate any agreement on price fixing, market sharing or other activities that limit free competition. Our standards and expectations in this area are described in further detail in the Saferoad Compliance Programme.

2.6 RESPONSIBLE SOURCING

Saferoad shall actively promote good work and standards in their supply chains. This means setting ethical standards for its suppliers, assessing the risk of potential supplier violations of these standards, and engaging in dialogue with risk suppliers concerning necessary improvements. Efforts to influence suppliers should be based on an ambition of continuous improvement, and should focus on the suppliers and product categories where the risk is deemed to be greatest. Saferoad's standards and expectations as regards company conduct in this area are based on Saferoad Code of Conduct and described in further detail in the Saferoad Procurement Policy.

2.7 MONEY LAUNDERING

Money laundering is the process of creating the appearance that assets obtained from criminal activity, originate from a legitimate source. Saferoad shall avoid any involvement with assets resulting from criminal activity.

2.8 WHISTLEBLOWING

Employees are often the first to discover misconduct at their workplace. It is important that an employee who discovers wrongdoing or possible misconduct by the company or any of its employees, consultants, contractors, or suppliers is able to report it to someone who is in a position to initiate corrective measures. A serious misconduct is an illegal, dangerous or any other act in breach of company regulations. Anyone who becomes aware of an incident/situation which appears to contravene rules and guidelines which apply to the Group's operations is encouraged to report this.

Every employee has the right to report possible censurable incidents without risk of retaliation or discrimination. Each employee is encouraged to report on possible censurable incidents but is not normally obliged to do so. However, every employee has an obligation to report on criminal activity and on incidents which could endanger life or health, or the assets of the Group.

Notification is beneficiary for each employee, for Saferoad and the society as a whole because it offers an opportunity to investigate and rectify unacceptable circumstances and to promote the positive development of Saferoad. A colleague willing to make a report is an important resource to Saferoad. Our principles, responsibilities and actions in this area are described in further detail in the Saferoad Compliance Programme, Whistleblowing Policy and Guidelines.

2.9 COMPLIANCE WITH LEGISLATION AND REGULATION

Saferoad is subject to Norwegian and international legislation and regulations.

Some Norwegian legislation also applies outside the country's border, e.g. the provisions of the penal code that refer to corruption.

Saferoad's employees, representatives and anyone who acts on behalf of Saferoad must comply with all legislation and regulations that apply, directly or indirectly, to the work performed for the Group. Saferoad's standards and expectations in this area are described in further detail in the Saferoad Compliance Programme.

Internal References:

- » The Saferoad Values
- » Saferoad Code of Conduct
- » Corporate Compliance Program description
- » Anti-bribery Guidelines
- » Competition compliance Guidelines
- » Data-protection Guidelines
- » Trade sanctions Guidelines
- » Procurement Policy
- » Whistleblowing Policy
- » Security Policy
- » HSE Guidelines
- » Crisis management
- » Saferoad communication platform
- » Branding Guidelines

External References:

- » <https://www.globalreporting.org/information/g4>
- » <https://www.unglobalcompact.org>

International conventions and declarations:

- » The Universal Declaration of Human Rights (UN 1948) - www.un.org
- » www.ilo.org
- » www.ethicaltrading.org
- » Freely Chosen Employment.: ILO Conventions Nos. 29 and 105
- » Freedom of Association and the Right to Collective Bargaining: ILO Conventions Nos. 87, 98, 135 and 154
- » No Child Labour; UN Convention on the Rights of the Child ILO Conventions Nos. 138, 182 and 79 ILO Recommendation No. 146
- » ILO Conventions Nos. 100 and 111
UN Convention on Discrimination Against Women
- » Safe and Hygienic Working Conditions; ILO Convention No. 155 and ILO Recommendation No. 164
- » Adequate Wages; ILO Convention No. 131
- » No Excessive Working Hours; ILO Convention No. 1 and 14