

Common policy adopted by the processing industry in Grenland to avoid work-related crime

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- We shall go the extra mile to tackle work-related crime. We do this by making stringent demands of suppliers and subsuppliers in order to avoid work-related crime.
- We shall have routines in place to follow up and sanction breaches of contract in our procurements.
- We report serious cases of work-related crime to the relevant supervisory bodies and/or the police

Definition of work-related crime:

In line with the Confederation of Norwegian Enterprise (NHO), we use the interpretation of work-related crime adopted by the Norwegian Ministry of Labour and Social Affairs.

The definition thus covers: *tax- and duty-related crime, serious violations of accounting and bookkeeping regulations, corruption, breach of trust, bankruptcy fraud, money laundering, currency smuggling, human trafficking, social security fraud, serious fraud, providing incorrect or false information and documentation to public authorities, serious breaches of the Working Environment Act, replacement of staff contrary to legislation and agreements, and violations of the Immigration Act.*

OUR COMMON POLICY

1. WE SHALL USE SUPPLIERS WITH ORDERLY PAY AND WORKING CONDITIONS

- The supplier undertakes, on request, to document pay and working conditions for their own employees and employees of any subsuppliers (including contract workers).
 - Reference [in Norwegian]: https://lovdata.no/dokument/SF/forskrift/2008-02-22-166/KAPITTEL_3#KAPITTEL_3
- We shall have the right to hold separate meetings directly with employees of suppliers and subsuppliers in the course of a contract period.
- The supplier undertakes to comply with the Act relating to general application of wage agreements within relevant fields as well as minimum wage requirements
 - Reference [in Norwegian]: (<https://lovdata.no/dokument/NL/lov/1993-06-04-58>)



2. WE SHALL HAVE THE RIGHT OF ACCESS TO RELEVANT TAX INFORMATION

- Suppliers shall, on request, submit relevant tax information in real time.

3. WE SHALL SET EXPERTISE REQUIREMENTS FOR OUR SUPPLIERS

- We set relevant qualification and competence requirements to satisfy ourselves that suppliers and their employees and contract workers are capable of fulfilling the contract. This includes legally required approvals.

4. WE SHALL HAVE A CLEAR SUPPLY CHAIN

- We will have oversight and control of the supply chain, and will be alert to the number of subsuppliers, reducing the number of links in the chain where possible and expedient.
- We will draw up contracts that ensure that the entire supply chain complies with Norwegian law and that the suppliers have control of their entire supply chain in turn.
- We make it a contractual requirement that all subsuppliers throughout the contract chain shall be approved prior to the work starting.

5. WE SHALL KNOW WHO IS WORKING FOR US

- All employees/people working on contract for us shall be named before reporting for work.
- We make it a contractual requirement that all employees shall carry a valid ID/HSE card where regulations require this.

6. WE SHALL KNOW WHOM WE ARE PAYING

- We make it a contractual requirement that all payments throughout the contract chain shall be traceable by bank; this covers payments to suppliers and subsuppliers as well as to their employees.

7. WE SHALL CARRY OUT CHECKS

- We shall safeguard our right of inspection and have routines in place enabling us to carry out checks throughout the contract period, and where necessary after expiry of the contract period.
- We check ID cards and carry out other checks (security, certificates, etc.) at the workplaces.
 - This covers documented safety training, certified safety training (truck, wheel loads, etc.), safety certificates (welding, electrics, automation, etc.)

8. SANCTIONS

- Breaches of our provisions may be sanctioned in accordance with the individual contract with the client.

