

**Supplier Code of Conduct**

**Sector Asset Management**

**Dated February 2023**

**sector**  
asset management

## Supplier Code of Conduct

The entities in the Sector Asset Management Group<sup>1</sup> provide various asset management-related services. The Group's primary activity is the management of various types of hedge funds and separately managed accounts.

Generally, the Group's activities are regulated and subject to authorisation and supervision from various public authorities, both in Norway and abroad. The Group has a duty to respect and honour human rights and decent working conditions. Further, the Group is committed to respect and not cause harm to all fundamental human rights.

All Group employees are required to act with the highest integrity in the performance of their obligations in their role as employees of the respective Group company. Each Group company has a zero-tolerance policy for violations of human rights, including (a) the right to equal treatment, (b) right to privacy, (c) freedom of thought and religion, (d) freedom of opinion and expression, (e) right to work and (f) right to rest and holiday. Employees are prohibited from infringing on the human rights of others, including other employees, clients or customers of the respective Group company, members of communities in which the respective Group company operates and other stakeholders.

The Group's suppliers constitute an integral part of our efforts to honour our commitments and comply with our duty to respect and honour human rights and decent working conditions.

We require all our suppliers (which in turn shall require from their employees and supply chain) to respect fundamental human rights and decent working conditions and conduct their business operations in accordance with internationally recognised principles for responsible business conduct. On this basis, we expect our suppliers to have policies and procedures ensuring that they respect:

- 1) Fundamental human rights, meaning the fundamental human rights as laid down in the UN's (i) International Covenant on Economic, Social and Cultural Rights and (ii) International Covenant on Civil and Political rights, as well as the ILO's declarations on Fundamental Principles and Rights at Work, including:
  - a. Equal treatment/anti-discrimination
  - b. Right to privacy
  - c. Freedom of thought and religion
  - d. Freedom of opinion and expression
  - e. Right to work
  - f. Right to rest and holiday

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<sup>1</sup> For the purpose of this Supplier Code of Conduct, the term encompasses Sector Asset Management and its subsidiaries, as well as Sector Gamma AS and Incentive AS (and any other entity that may become part of the group after the date hereof)

- 2) Decent working conditions, means work that:
- a. observe the fundamental human rights as laid down in the UN's (i) International Covenant on Economic, Social and Cultural Rights and (ii) International Covenant on Civil and Political rights, as well as the ILO's declarations on Fundamental Principles and Rights at Work,
  - b. observe health, safety and environment in the workplace, and
  - c. provides for a living wage.

The Sector Asset Management Group reserves the right to carry out audits of our suppliers and their supply chains with respect to the above expectations. The purpose of such audits will be to verify that previously submitted information is correct and to determine whether the supplier or its supply chain (as applicable) complies with the above expectations.

We will take a risk-based approach in determining whether to carry out an audit, including with respect to which supplier to audit, when to audit and the scope of the audit.