



Code of Conduct for Business Partners

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1. Introduction

The QRILL Company is a marine and Antarctic krill-harvesting company developing krill-derived products for health, wellness, and nutrition. The QRILL Company is committed to conducting business in a responsible, sustainable and ethical manner, in compliance with applicable laws, internationally recognized standards and its own ethical framework.

This Code of Conduct for Business Partners (the "Code") defines the minimum requirements The QRILL Company expects Business Partners to meet. This Code applies to all Business Partners of The QRILL Company, including but not limited to suppliers, vendors, customers, service providers, agents, intermediaries, joint venture partners, and any other entities or individuals conducting business with, representing, or acting on behalf of The QRILL Company.

The Code should be read together with The QRILL Company Code of Conduct, which sets out the standards applicable to The QRILL Company employees and representatives.

Business Partners must comply with all applicable laws and regulations in the countries where they operate.

Business Partners are also expected to act in accordance with the following internationally recognized standards:

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- ILO Core Conventions and the ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights
- The ten principles of the UN Global Compact
- UN Global Compact Sustainable Ocean Principles



2. Scope, Compliance and Adherence

By engaging in business with The QRILL Company, Business Partners agree to uphold the requirements of this Code and ensure that all individuals acting on their behalf, including employees, subcontractors and agents, are aware of and committed to meeting these standards.

Business Partners remain accountable for ensuring that their own suppliers and subcontractors uphold equivalent standards and operate in accordance with the principles described in this Code.

Where a Business Partner identifies a conflict between the requirements of this Code and applicable to local law, the Business Partner shall notify The QRILL Company. The stricter standard shall apply unless prohibited by law.



3. Good Governance

Compliance with Laws

Business Partners shall comply with all applicable laws and regulations and act ethically, responsibly and transparently.

Transparency Act

Business Partners operating in Norway or delivering goods or services to The QRILL Company in Norway shall comply with the Norwegian Transparency Act. This includes conducting human rights due diligence, respecting fundamental rights and decent working conditions, and providing relevant information upon request.

Corruption and Improper Payments

Bribery, kickbacks, facilitation payments and improper advantages are strictly prohibited, whether involving public officials or private parties and whether made directly or indirectly through agents, intermediaries or other third parties. Business Partners shall maintain anti-corruption procedures proportionate to the risks they face.

Anti-Money Laundering

Business Partners shall actively prevent money laundering and terrorist financing. Business Partners shall only conduct business with reputable counterparties involved in legitimate activities and using funds derived from legitimate sources.

Gifts, Hospitality and Expenses

The QRILL Company does not accept or offer gifts from or to Business Partners, except modest branded or promotional items of nominal value, generally not exceeding NOK 500 or USD 50. Hospitality must have a clear business purpose, be reasonable and proportionate, and must never be offered during contract bidding, evaluation, award or regulatory processes. Cash and cash equivalents must never be offered to or accepted by The QRILL Company personnel.

Competition

Business Partners shall comply with all applicable competition and antitrust laws. Business Partners must not participate in price fixing, bid rigging, market sharing or other anti-competitive conduct.

Conflict of Interest

Business Partners shall avoid actual or perceived conflicts of interest and promptly disclose potential issues to The QRILL Company. This includes relationships or circumstances that could influence business decisions.

Tax Obligations

The QRILL Company expects transparent and responsible tax practices. Business Partners shall comply with tax laws and shall not use artificial structures designed primarily to evade or aggressively avoid tax obligations.

Sanctions and Export Controls

Business Partners shall comply with applicable economic sanctions and export control laws and regulations, including those administered by Norway, the EU, the UN and the United States. Business Partners shall not engage in business with restricted parties, sanctioned countries or sanctioned territories in violation of applicable rules.

Lobbying

Any lobbying activities shall be conducted ethically, lawfully and transparently.

Data Protection

Business Partners shall comply with applicable data protection laws, including the EU General Data Protection Regulation where applicable. Personal data shared during the business relationship shall only be processed for the purpose of which it was provided.

Whistleblowing

Business Partners should maintain secure reporting channels for employees and relevant stakeholders.

Significant investigations related to The QRILL Company business shall be reported to The QRILL Company. Concerns may also be reported through The QRILL Company integrity channel:

<https://theqrillcompany.integrity.complylog.com/>

Confidentiality and Intellectual Property

Business Partners shall protect confidential and proprietary information belonging to The QRILL Company and shall not disclose such information to third parties without prior written consent. This obligation continues after the business relationship ends.

Embedding Sustainability in Operations

Business Partners are expected to **integrate sustainability** into policies, targets, strategy and operations, and to work towards **reducing adverse impacts and increasing positive impacts** for governance, people, the planet, and society.

Communication and Reporting

Business Partners are expected to communicate and report transparently and accountably on material impacts connected to their business activities.



4. Respect for People

Human Rights

Business Partners shall respect internationally recognized human rights and conduct due diligence to identify, prevent, mitigate and address adverse human rights impacts in their own operations and supply chains. Business Partners shall implement effective systems to manage human rights risks.

Health and Safety

Business Partners shall provide a healthy, safe and secure work environment. This includes compliance with applicable health and safety laws, adequate training and procedures to prevent workplace accidents and occupational illness.

Minimum Age of Labour

Business Partners shall not employ workers under the age of 15 or the applicable legal minimum age, whichever is higher. Workers under the age of 18 shall be protected from hazardous work and excessive working hours.

Forced Labour

Business Partners shall not use forced, bonded, involuntary or prison labour, modern slavery, debt bondage, indentured servitude or human trafficking. Workers shall not be required to surrender identity documents or pay recruitment fees as a condition of employment.

Freedom of Association and Collective Bargaining

Business Partners shall respect employees rights to form and join trade unions and to be represented in collective bargaining agreements. Where rights are restricted by law, alternative lawful worker representation shall not be hindered.

Employment Practices

Business Partners shall ensure lawful and fair employment practices, including written employment contracts in a language understood by the worker, timely payment of wages and compliance with wage, benefits, working condition, working hours, overtime and rest period requirements.



Non-Discrimination

Business Partners shall promote inclusive practices and shall not accept harassment or discrimination based on any protected characteristic under applicable law.

Minority and Indigenous Rights

Business Partners shall respect Indigenous and minority rights. Where operations may affect Indigenous peoples or minority groups, Business Partners shall manage impacts responsibly and apply Free, Prior and Informed Consent principles where relevant.

Human Trafficking

Business Partners shall not accept, support or engage in any form of human trafficking.

Security Resources

Security personnel and contractors shall be properly selected, vetted and trained to respect human rights, including the use of proportionate force and respect for individuals and local communities.

Equality, Diversity and Inclusion

Business Partners are expected to support equality, diversity and inclusion throughout their business, including equal opportunities and inclusive practices at all levels.

5. Care for the Planet

Protecting Ecosystems and Biodiversity

Business Partners are expected to safeguard biodiversity and marine ecosystems. Where relevant to Antarctic and marine operations, Business Partners shall comply with applicable conservation requirements, including CCAMLR regulations and other relevant conservation frameworks.

Ocean and Water

Business Partners are expected to protect ocean and water-related ecosystems and reduce adverse impacts on water resources.

Climate Responsibility

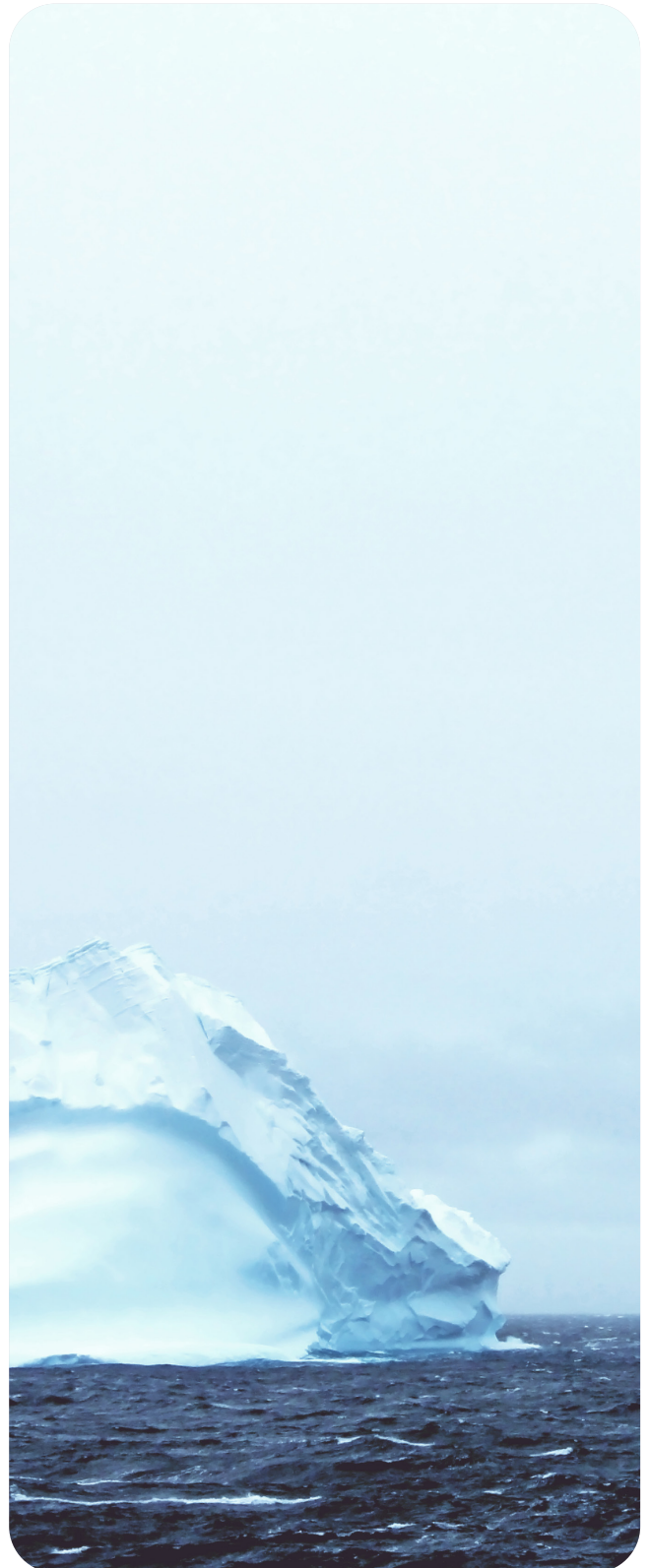
Business Partners are expected to reduce their environmental footprint and integrate sustainability into daily operations. Where relevant, Business Partners should work to reduce greenhouse gas emissions, improve energy efficiency, and identify lower-impact alternatives for products and services.

Waste and Circularity

Business Partners shall minimize waste, handle hazardous materials responsibly, and work towards circular practices. Waste shall be prevented where possible and, when unavoidable, handled safely for people and the environment.

Pollution Prevention and Resource Efficiency

Business Partners shall prevent or safely manage pollution and use natural resources responsibly. Hazardous substances and hazardous waste shall be managed according to applicable law and high safety standards.



6. Prosperity for All

Community Impact and Engagement

Business Partners are expected to engage constructively with local communities, maintain open dialogue, and consider local needs and expectations in business decisions. Business Partners shall respect community livelihoods and manage natural resources responsibly.

Sustainable Development Goals

The UN Sustainable Development Goals may serve as a guiding framework for strengthening Business Partners sustainable strategies and practices.

Innovation and Sustainable Development

The QRILL Company encourages Business Partners to invest in research, technology development and innovation that advance sustainability. This includes science, digitalization, collaboration, knowledge sharing and lower-impact solutions.



7. Compliance, Monitoring and Enforcement

Responsible Supply Chain Management

Business Partners are responsible for ensuring that their supply chain is sustainable and for extending the principles of this Code throughout their value chain by requiring suppliers and subcontractors to uphold equivalent standards. Business Partners shall conduct risk-based due diligence to understand their value chains and identify environmental, social, governance, and ethical risks.

Audit and Verification

The QRILL Company reserves the right to verify compliance with this Code, including through self-assessment questionnaires, documentation requests, site visits and third-party audits. Business Partners shall cooperate with such verification and provide reasonable access to relevant records and personnel.

Reporting and Transparency

Business Partners shall promptly notify The QRILL Company of any material breach of this Code, any investigation by a regulatory authority or any legal proceedings that may affect the business relationship with The QRILL Company.

Remediation

Where a breach is identified, The QRILL Company may work with the Business Partner to agree with a remediation plan within a reasonable timeframe. Business Partners are responsible for taking immediate and relevant remedial actions.

Termination

The QRILL Company reserves the right to suspend or terminate the business relationship in cases of serious or repeated breaches, or where the Business Partner fails to cooperate with remediation efforts.

8. Acknowledgement

By signing below, the Business Partner confirms that it has read, understood and accepted the requirements and expectations set out in this Code of Conduct for Business Partners.

Business Partner name	
Company registration number	
Authorised representative	
Title / role	
Date and signature	

9. Related Documents

Reference	Documents	Relevance
MAN-0007	Code of Conduct (v2.0)	The QRILL Company internal standards
POL-0004	Anti-Bribery and Corruption Policy (v2.0)	Anti-corruption requirements
POL-0005	Gifts and Hospitality Policy (v2.0)	Gift thresholds and hospitality requirements
POL-0006	Sanctions and Export Controls Policy (v1.0)	Sanctions and export control compliance
POL-0003	Whistleblowing Policy (v2.0)	Reporting channels
MAN-754	Supplier Declaration	Supplier acknowledgement and acceptance