

01/06/2026

## **Sustainability, Environmental Responsibility and Responsible Business Conduct Policy Klubben AS**

Klubben AS is committed to conducting its business in a sustainable, ethical and responsible manner that protects people, the environment and society. We recognize that our operations impact the climate, natural resources and people throughout our value chain, and we will work systematically to reduce negative impacts and contribute to positive development.

Through our Eco-Lighthouse (Miljøfyrtårn) certification, our membership in Ethical Trade Norway (Etisk Handel Norge), and our Fairtrade activities, we are committed to following internationally recognized standards for environmental responsibility, human rights and responsible business conduct.

### **Reducing Climate and Environmental Impact**

Klubben AS shall continuously work to reduce the climate and environmental impact of its operations throughout the value chain.

#### **We will:**

- Reduce waste and increase reuse and material recycling.
- Reduce the use of unnecessary plastic and packaging.
- Optimize resource and energy consumption.
- Prioritize products and solutions with a documented lower environmental impact.
- Work to reduce emissions related to transportation and logistics.
- Assess climate and environmental impacts when developing new products and making purchasing decisions.

### **Integrating Sustainability into the Business Model**

Sustainability shall be an integral part of Klubben AS' strategy, decision-making processes and purchasing activities.

#### **We will:**

- Include environmental and social considerations in procurement processes.
- Conduct due diligence assessments in accordance with the OECD Guidelines for Responsible Business Conduct.
- Work towards continuous improvements among our suppliers.
- Promote responsible production conditions through long-term supplier relationships.

### **Responsible Business Conduct and Human Rights**

Klubben AS respects internationally recognized human rights and labour rights.

#### **We will:**

- Comply with the Norwegian Transparency Act and conduct annual due diligence assessments.

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- Operate in accordance with the principles of Ethical Trade Norway.
- Require our suppliers to comply with the Klubben AS Code of Conduct.
- Oppose child labour, forced labour, discrimination and corruption.
- Promote freedom of association and the right to collective bargaining.
- Work to ensure safe working conditions and respect for workers' rights.
- Support efforts to achieve living wages and decent working conditions throughout the supply chain.

### **Fairtrade Commitment**

Klubben AS is committed to contributing to fairer trading conditions through our work with Fairtrade-certified products.

#### **We will:**

- Purchase Fairtrade products from approved Fairtrade-certified suppliers.
- Ensure traceability and compliance with Fairtrade requirements throughout the value chain.
- Maintain long-term and transparent relationships with Fairtrade suppliers.
- Contribute to increased demand for Fairtrade products through information, marketing and product development.
- Integrate Fairtrade-related risks into our due diligence assessments and follow-up processes.

### **Meeting Stakeholder Expectations**

Klubben AS shall operate openly and transparently towards employees, customers, suppliers, owners and other stakeholders.

#### **We will:**

- Report on our sustainability performance through relevant reporting frameworks.
- Maintain dialogue with stakeholders regarding environmental and social issues.
- Use stakeholder input as a basis for continuous improvement.

Promoting a Positive Working Environment

Klubben AS shall be a safe and inclusive workplace.

#### **We will:**

- Promote equality, diversity and inclusion.
- Ensure employee participation and open dialogue.
- Prevent discrimination, harassment and exclusion.
- Facilitate competence development and employee well-being.
- Maintain a safe and health-promoting working environment.

### **Priority Areas for Improvement**

Klubben AS has identified the following areas as particularly important for our continuous improvement efforts:

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- Reduction of Plastic Use and Waste
- We will continuously assess packaging, product design and logistics with the objective of reducing plastic consumption and waste generation.
- Improving Working Conditions in the Supply Chain
- Through due diligence assessments, supplier follow-up and dialogue, we will work to improve working conditions and compliance with international labour standards.
- Low-Emission Transportation and Logistics
- We will prioritize transportation solutions that contribute to reduced emissions and improved transport efficiency.

### **Decent Working Conditions and Living Wages**

We will work to ensure that workers in our supply chain have safe working conditions, worker representation and wage levels that contribute to a decent standard of living.

### **Continuous Improvement**

Klubben AS shall annually evaluate objectives, actions and results related to environmental performance, responsible business conduct and Fairtrade. This policy shall be reviewed regularly and updated when necessary.

Approved by the Management of Klubben AS



Erik Heggelund  
Managing Director



Kari Heggelund  
Chair of the Board / Sustainability Manager

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