



CODE OF CONDUCT

Ludvigsen AS

INTRODUCTION

At Ludvigsen AS we work towards a responsible work life where workers basic rights are taken care of, this applies to both within our own business such as in our expectations toward our suppliers. The principles we follow is clarified in these guidelines.

We wish for our suppliers to get to know these guidelines. We want the suppliers or others to warn us if they experience any violation to these guidelines. Warnings can and will be handled anonymously when requested.

At Ludvigsen AS we take the environment seriously. We focus on environmental solutions and products. We are continuously working to maintain the standards our industry demands. Most of all we would like to be ahead of the demands where it is possible. It will always be a certain kind of environmental impact in the production of packaging, but we work actively to take environmental choices in our business. Our most important goal is to deliver products with high performance, quality and great design which have low environmental impact.

In collaboration with our suppliers, we work to ensure decent work and climate standards in our purchases and supply chains. Ludvigsen AS is a member of Norwegian Retailers' Environment Fund and Green Dot Norway. We are also certified with the Eco-Lighthouse certification. Eco-Lighthouse is the first national certification scheme in Europe to be recognized by the European Commission. The recognition is proof that the scheme has standards and quality in line with international labeling schemes (EMAS and ISO 14001). This work means that we at Ludvigsen AS commit ourselves to being alert in the markets we operate in, and to work actively for continuous improvement in all stages of our business.



IMPLEMENTATION

Our suppliers undertake to produce and deliver goods in line with the ethical guidelines. The suppliers must ensure that their own subcontractors also follow these standards, including all subcontractors further down the value chain.

Suppliers must be able to document compliance with the ethical guidelines, as well as statutory requirements, at Ludvigsen AS's request within an agreed and reasonable deadline. Such documentation can be a self-declaration, follow-up meetings, and/or inspection of the working conditions and of the production site. The suppliers must continuously improve and do their utmost to meet the minimum standards. Commitment and effort to satisfy these requirements will be a basic prerequisite for the collaboration with Ludvigsen AS to be able to continue. If relevant improvement measures and agreed follow-up are not carried out, or if statutory requirements are not met, Ludvigsen AS may decide to end the business relationship.

The suppliers must have satisfactory management systems to document and monitor both product quality and other business processes. The OECD's guide for due diligence assessments for responsible business is a recommended framework. This includes risk assessments to identify possible negative impacts, to prevent such impacts as well as to monitor and evaluate the effect of the measures that have been implemented. Ludvigsen AS must be notified of significant deviations or breaches of these ethical guidelines. Inquiries shall be made to georg@ludvigsen.no

In the event of a deviation or conflict between the national legislation and these guidelines, the supplier must follow the strictest of the standards that are in accordance with the applicable law.



Photo © I. Hermansen

PRINCIPLES

Ludvigsen AS' ethical trading principles are based on the UN's human rights and the ILO's 8 Core Conventions, and set the minimum standard, not the maximum standard.

The suppliers must follow all relevant national and international laws as well as internationally recognized standards such as OECD, UN and ILO Conventions for human rights, health and safety, labor rights, environment, fair competition, anti-corruption, and fair business practices.

1. Forced and compulsory labour (ILO Conventions No. 29 and 105)

1.1 There must not be any form of forced labour, slave labor or involuntary labour.

1.2 Workers must not have to deliver a deposit or identity documents to the employer and must be able to freely terminate the employment relationship with reasonable notice.

2. Freedom Association and the Right to Collective Bargaining (ILO Conventions No. 87, 98, 135 and 154)

2.1 Workers shall, without exception, have the right to join or establish trade unions of their own accord, and to bargain collectively. The employer must not interfere with, prevent or oppose trade union organization or collective bargaining.

2.2 Trade union representatives must not be discriminated against or prevented from carrying out their trade union work.

2.3 If the right to free organization and/or collective bargaining is limited by law, the employer must facilitate, and not prevent, alternative mechanisms for free and independent organization and negotiation.

3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions No. 138, 182 and 79, and ILO Recommendation No. 146)

3.1 The minimum age for workers shall not be less than 15 and comply with

3.1.1. the national minimum age for employment, or;

3.1.2. the age of completion of compulsory education, whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

3.2. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.

3.3. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.

3.4. Action plans must be established for rapid phase-out of child labor that is in breach of ILO Conventions 138 and 182. The action plans must be documented and communicated to relevant staff and other stakeholders. Arrangements must be made for support schemes where children are given the opportunity for education until the child is no longer of compulsory school age.

4. Discrimination (ILO Conventions No. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1. There shall be no discrimination in employment, remuneration, training, promotion, dismissal or retirement based on ethnicity, caste, religion, age, disability, gender, civil status, sexual orientation, trade union work or political affiliation.

4.2. Protection must be established against sexually intrusive, threatening, insulting or exploitative behaviour, and against discrimination or dismissal on unfair grounds, e.g. marriage, pregnancy, parenthood or status as HIV-infected.

5. Harsh or Inhumane Treatment (The Declaration of Human Rights/UDHR)

5.1. Physical abuse or punishment, or the threat of physical abuse, is prohibited. The same applies to sexual or other abuse and other forms of humiliation.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1. Efforts must be made to ensure workers a safe and healthy working environment. Hazardous chemicals and other substances must be handled properly. Necessary measures must be taken to prevent and minimize accidents and health damage as a result of, or related to, conditions at the workplace.

6.2. Workers must have regular and documented training in health and safety. Health and safety training must be repeated for newly employed and relocated workers.

6.3. Workers must have access to clean sanitary facilities and clean drinking water. If relevant, the employer must also provide access to facilities for the safe storage of food.

6.4. If the employer offers accommodation, this must be clean, safe, adequately ventilated and with access to clean sanitary facilities and clean drinking water.

7. Wages and benefits (ILO Convention No. 131)

7.1. Salary to workers for a normal working week must at least be in line with national minimum wage regulations or industry standards, whichever is higher. Salary must always be sufficient to cover basic needs, including some savings.

7.2. Pay conditions and payment of wages must be agreed in writing before the work begins. The agreement must be comprehensible to the worker.

7.3. Deductions from wages as a disciplinary reaction are not permitted.

8. Working Hours (ILO Convention No. 1 and 14)

8.1. Working hours must be in line with national laws or industry standards, and not exceed working hours in accordance with applicable international conventions. Normal working hours per week should not normally exceed 48 hours.

8.2. Workers must have at least one day off per 7 days.

8.3. Overtime must be limited and voluntary. The recommended maximum overtime is 12 hours per week, i.e. total working hours of 60 hours per week. Exceptions to this can be accepted if it is regulated by a collective agreement or national law.

8.4. Workers must always receive overtime pay for working hours beyond normal working hours (see point 8.1 above), at least in line with current laws.



9. Regular Employment (ILO Convention No. 95, 158, 175, 177 and 181)

9.1. Obligations towards workers, in line with international conventions, national laws and regulations on regular employment, must not be circumvented through the use of short-term engagements (such as the use of contract workers, temporary workers and day workers), subcontractors or other employment relationships.

9.2. All workers are entitled to an employment contract in a language they understand.

9.3. Apprenticeship programs must be clearly defined regarding duration and content.

10. Marginalized Population

10.1. The production and use of natural resources must not contribute to destroying the resource and income base for indigenous people or other marginalized population groups, for example by confiscating large areas of land, irresponsible use of water or other natural resources on which the population groups depend.

11. Environment

11.1. Negative environmental impact must be reduced throughout the value chain. In line with the precautionary principle, measures must be implemented to continuously minimize emissions of greenhouse gases and local pollution, the use of harmful chemicals, pesticides and to ensure sustainable resource extraction and management of water, sea, forest and land, and conservation of biological diversity.

11.2. National and international environmental legislation and regulations must be complied with and relevant emission permits must be obtained.

12. Corruption

12.1. All forms of bribery are unacceptable, such as the use of alternative channels to secure illegitimate private or work-related benefits to customers, agents, contractors, suppliers or their employees and public officials.

13. Animal Welfare

13.1. Animal welfare must be respected. Measures should be taken to minimize the negative impact on the welfare of production animals and working animals.

13.2. National and international animal welfare legislation and regulations must be observed.

As a supplier/collaboration partner to Ludvigsen AS, we confirm that we have familiarized ourselves with the guidelines in this document.

Supplier (printed letters): _____

Place and date: _____

Suppliers signature: _____

Title: _____

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