

## **NRP Group Code of Conduct**

### **1. Application**

#### **NRP commitment**

The Code of Conduct constitutes the NRP Group commitment to act in compliance with all relevant legal requirements, as well as acting in a sustainable, ethical, and socially responsible manner.

The principles contained herein represent a supplement to the relevant governing documents.

#### **Scope of application**

The code applies to all individuals who work for NRP This includes employees, board members, hired personnel and others who act on behalf of NRP.

We must ensure that our business is performed in accordance with the principles of the Code as well as applicable laws and regulations. Employees are expected to demonstrate commitment and set tone for the NRP culture.

We expect our business partners to adhere to standards that are consistent with NRP's ethical standards.

#### **Applicable laws**

The NRP Group consist of various companies licensed by the Norwegian Financial Services Authority (Finanstilsynet). As Norwegian entities, they comply with applicable Norwegian laws and regulations, as well as applicable laws and regulations in the countries where we operate.

The legal requirements as licensed entities are outlined in their Compliance Manuals.

It is our policy to act in accordance with relevant internationally recognized conventions, standards, and industry best practices in our investment processes.

### **2. Conduct of business principles**

#### **Ethical standards**

A high level of integrity and professionalism must be exercised when pursuing NRP's business. This requires professionalism and quality, together with probity, caution, and objectivity at all levels of our operations.

It is our policy to act in accordance with relevant internationally recognized conventions, standards, and industry best practices in our investment processes.

## **Confidentiality**

NRP has a duty to safeguard and not misuse confidential information we may possess, whether it concerns NRP, our business partners or our investors. We follow high standards of information security to protect such information, and to protect legitimate privacy rights.

## **Anti-corruption, gifts, bribery**

Corruption is defined as demanding, receiving or accepting an offer of an improper advantage in relation to a position, task or assignment, or offering someone an improper advantage in relation to a position, task or assignment.

NRP does not tolerate and works against corruption in all its forms. We do not demand, receive, or offer bribes or other improper advantages.

## **Anti - money laundering**

NRP has a duty to contribute to the integrity of the financial system, and to combat financial crime. We have systems and procedures in place designed to detect, report, and stop any suspected money laundering or terrorist financing.

NRP does not do business with sanctioned or Ultra High-Risk Countries, groups, organizations, or individuals.

## **Conflicts of interest**

NRP is constantly monitoring our business to identify possible conflicts of interest. Once detected, such conflicts are managed with the aim of safeguarding our investor's interests.

## **ESG and Responsible Investments**

Environmental, Social and Governance considerations are an integral part of delivering investment performance for our investors. NRP has developed guidelines that outline how ESG factors are identified and assessed within our investment and management process.

## **Diversity and equal opportunity**

In NRP, we believe that people with different thoughts and opinions make our business stronger. Therefore, everyone has the same chance to get ahead, whatever his or her ethnicity, gender, age, religion, sexual orientation, or any other ground.

## **Human rights and labour rights**

Within our sphere of influence, we support and respect the protection of internationally proclaimed human rights and ensure that we are not involved in human rights abuse.

NRP supports and respects internationally recognized labor rights, including the freedom of association and collective bargaining. We support the abolition of child labor and all forms of forced and compulsory labor, and the elimination of discrimination related to employment and occupation.