

ETHICAL CODE OF CONDUCT

Nammo

TABLE OF CONTENT

1. Objective, Target Group and Warranty	4	3. Code of Business Conduct	7	4. Code of Personal Conduct	12	5. Practice and Follow-up	17
		3.1 Applicability	7	4.1 Purpose	12	5.1 Personal Responsibility	17
		3.2 Purpose	7	4.2 Protection of Nammo's Property and Assets	12	5.2 Managerial Responsibility	17
		3.3 Code of Conduct	7	4.3 Confidentiality	12	5.3 Handling Cases of Doubt	
2. The Ethical Code of Conduct	5	3.4 Anti-Corruption Provisions	8	4.4 Corruption	13	and Breaches of the Rules	17
2.1 Main purpose	5	3.5 Export Control	9	4.5 Gifts, Hospitality and Expenses	13	5.4 Ethical Committee	17
2.2 Nammo Commitment	5	3.6 Products and Services	9	4.6 Conflict of Interest	14	5.5 Whistleblowers	18
2.3 Presentation of the Code of Conduct	5	3.7 Contractual Arrangements	9	4.7 Directorships, Employment or other Assignments	15	5.6 Consequences	18
		3.8 Relationships with Government Authorities, Suppliers, Partners and Customers	9	4.8 Purchase of Sexual Services	15	5.7 Responsibility of Compliance	18
		3.9 Equality and Diversity	10	4.9 Intoxicants	15	5.8 Responding to Enquiries from the Media and other Interest Groups	18
		3.10 Personnel Information	10				

1. Objective, Target Group and Warranty

The objective of this document is to state the requirements for business practice and personal conduct. The target group is all Nammo Group employees, as well as the members of the Board of Directors of Nammo and of its subsidiaries, hired personnel, consultants, intermediaries, lobbyists and others who act on Nammo's behalf, hereinafter referred to as "the individual".

2. The Ethical Code of Conduct

2.1 Main purpose

The Ethical Code of Conduct describes the Nammo Group's (Nammo) commitment and requirements in connection with issues of an ethical nature that relate to business practice and personal conduct.

2.2 Commitment

In its business activities, Nammo will comply with applicable laws and regulations and act in an ethical, sustainable and socially responsible manner. Nammo does not tolerate the use of forced or child labour. Nammo supports the UN Universal Declaration of Human Rights.

2.3 Presentation of the Code of Conduct

The Ethical Code of Conduct describes Nammo's ethical standards and requirements. The intention is to be as clear and direct as possible in terms of difficult issues the individual may face when working for Nammo. When handling ethical issues, it is important to follow a number of simple rules;

- Make sure one's actions are within the law and comfortably within Nammo's own ethical requirements
- Be open and transparent with regard to ethical issues. If in doubt, contact your superior and/or the Nammo Ethical Committee
- Spend sufficient time and consult with colleagues and superiors on difficult decisions

Nammo shall be recognised for its high ethical standards. Breaches of laws and ethical requirements are therefore a threat to the Group's future development, competitiveness and reputation in the market.



3. Code of Business Conduct

3.1 Applicability

This code of conduct applies to all domestic and foreign operating companies or units within Nammo.

3.2 Purpose

The purpose of the code of conduct is to establish procedures to ensure full compliance with laws and regulations applicable to any business transaction or business opportunity and/or any employee's relationship involving any entity of Nammo or its intermediaries. Every employee or intermediary who assigns duties that are likely to lead to involvement in or exposure to any areas covered by this code of conduct, should become familiar with such regulations and has an obligation to comply with the code of conduct. The areas addressed in particular by the code of conduct are the following;

- Anti-corruption
- Export control
- Products and services
- Employees

3.3 Code of Conduct

Nammo's Code of Conduct requires the employees to deal with customers, partners, intermediaries and suppliers in a fair and ethical manner in accordance with all applicable laws and regulations, and to ensure compliance with the anti-corruption provisions pursuant to applicable laws in the country where Nammo does business.

Nammo's Code of Conduct requires that we develop, produce, market and sell products and services which are consistent with all applicable laws and regulations in the countries where Nammo operates.

Nammo's Code of Conduct requires the employees to behave in accordance with all applicable laws and regulations in the countries where Nammo operates.

3.4 Anti-Corruption Provisions

The Organisation for Economic Co-operation and Development (OECD) has adopted a convention that requires countries which are parties to the convention to criminalize bribery of foreign public officials and to punish such bribery on a basis comparable to domestic bribery.

The OECD convention prohibits improper gifts, payments or offerings of anything of value to any public official or foreign official for the purpose of influencing any action (or failure to act) in his or her official capacity. Furthermore, the OECD convention also prohibits the reception of such improper gifts, payments or offerings for the purpose of influencing any action as set forth above, by a person in his or her capacity as an official or employee in a company.

Payments, authorisations, promises or offers of payment or improper gifts to any person or entity are also prohibited if there is any knowledge or a reason to know that any such payment or gift or part thereof is to be passed along to an official for the above-mentioned purpose.

The term "official" includes any officer or employee of the foreign government or local authority or any department, agency or instrumentality thereof or any person acting in an official capacity for or on behalf of any such government, department, agency or instrumentality.

The convention further requires parties to co-operate in the investigation and enforcement of trans-national anti-bribery laws.

3.5 Export Control

Nammo shall comply with the laws and regulations of the export regime of the respective countries from which Nammo exports its products and services. It is the responsibility of Nammo to provide all required information to the export authorities.

3.6 Products and Services

Nammo shall comply with the laws and regulation of the respective countries where Nammo operates, with respect to development, production, marketing and sales of products and services.

3.7 Contractual Arrangements

Prior to entering into a contractual arrangement with any intermediary, the Candidate in question shall undergo a due diligence in accordance with the applicable Nammo procedures.

All agreements and amendments or other modifications thereto with agents or other representatives of any company or unit within Nammo shall be handled in accordance with Nammo's approval procedure for intermediaries.

All agreements shall be in writing.

3.8 Relations with Government Authorities, Suppliers, Partners and Customers

Nammo shall conduct its business in such a way that Government Authorities, suppliers, partners and customers can have trust in the Group.

3.9 Equality and Diversity

Nammo shall show respect for all individuals and make active efforts to ensure a good working environment characterised by equality and diversity. Nammo does not accept any form of discrimination towards its own employees or others involved in Nammo's activities. It may, however, sometimes be legal and justifiable to use positive discrimination to achieve equality and diversity.

Discrimination includes all unequal treatment, exclusion or preference on the basis of race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin or other similar circumstances that result in the neglect or compromise of the principle of equality.

When recruiting personnel the process must be performed in accordance with national security in the respective country.

3.10 Personnel Information

Nammo shall periodically brief its marketing, sales, financial, purchasing and other personnel who have contact with customers or suppliers, or contact with agents or other representatives, of applicable anti-corruption provisions and this policy. It is the responsibility of each employee within Nammo to assure compliance with the Code of Conduct.



4. Code of Personal Conduct

4.1 Purpose

Nammo sets high ethical standards for everyone who acts on behalf of the Group. The individual must abide by applicable laws and regulations and carry out their duties in accordance with the requirements and standards that apply in Nammo.

Nammo expects the individual to treat everyone with whom they come into contact through their work or work-related activities with courtesy and respect. The individual must refrain from all conduct that can have an unnecessarily negative effect on colleagues, the working environment or Nammo. This includes any form of harassment, discrimination or other behaviour that colleagues or business associates may regard as threatening or degrading. The individual must not behave in a manner that can offend local customs or culture.

4.2 Protection of Nammo's Property and Assets

The use of Nammo's time, materials, financial assets or facilities for purposes not directly related to Nammo's business is prohibited without authorisation from a relevant Nammo representative. The individual must protect Nammo's property and assets against loss, damage and abuse.

4.3 Confidentiality

The duty of confidentiality should prevent unauthorised persons from gaining access to information that may harm Nammo's business or reputation. This duty should also protect individuals' privacy and integrity. Careful consideration should therefore be given to how, where and with whom Nammo-related matters are discussed, in order to ensure that unauthorised persons do not gain access to internal Nammo information. The individual must comply with the requirements for confidential treatment of all such information, except when disclosure is authorised or required by law.

Information classified as "confidential" or "Nammo internal restricted distribution" must not be disclosed to unauthorised personnel in Nammo.

This also applies to sensitive information concerning security, individuals, commercial, technical or contractual matters and to information protected by law. The duty of confidentiality continues to apply after termination of the employment relationship or after an assignment has been completed. Information other than general business knowledge and work experience that becomes known to the individual in connection with the performance of their work shall be regarded as confidential and treated as such.

4.4 Corruption

The prohibition against corruption described in section 3.4 applies for individuals acting on Nammo's behalf.

4.5 Gifts, Hospitality and Expenses

The individual must not, directly or indirectly, accept gifts except for promotional items of minimal value normally bearing a company logo. Other gifts may be accepted in situations where it would clearly give offence to refuse; in such situations, the individual shall inform their superior. Exclusive and high-value gifts must be handed over immediately to Nammo and will be regarded as Nammo property.

Hospitality, such as social events, meals or entertainment may be accepted by the individual if there is a clear business reason. The cost of any hospitality must be kept within reasonable limits. Travel, accommodation and other expenses for the individuals themselves in connection with such hospitality must always be paid by Nammo. However, we must distinguish between these restraints and natural expected hospitality and behaviour in accordance with different business cultures in our markets.

The above principles also apply in the reverse direction, so that no individual acting on behalf of Nammo may, in their dealings with customers, suppliers and other parties, offer or agree to pay for gifts, hospitality or other expenses that would violate these principles. Particular care must be taken in dealings with public officials.

All matters concerning the acceptance or offer of gifts, hospitality and similar advantages must be discussed and agreed between the individual and their superior. Occasional attendance at local sporting or social events does not require such agreement, but in order to ensure openness about such attendance, the superior should be informed.

4.6 Conflict of Interest

The individual must behave impartially in all business dealings and not give other companies, organisations or individuals improper advantages. The individual must not become involved in relationships that could give rise to an actual or perceived conflict with Nammo's interest, or could in any way have a negative effect on their own freedom of action or judgement.

No individual must work on or deal with any matter in which they themselves, their spouse, partner, close relative, or any other person with whom they have close relations, has a direct or indirect financial interest. Nor can the individual work on or deal with any matter where there are other circumstances that might undermine trust in the employee's own impartiality or to the integrity of the work.

The individual must not use the Group's property or information acquired through their position or office in Nammo for personal advantage or for the purpose of competing with the Group. Suspicion of a conflict of interest should be reported to a superior.

4.7 Directorships, Employment or other Assignments.

Nammo employees must not engage in other paid directorships, employment or assignments of any significance outside Nammo, except if approved by Nammo. Should a conflict of interest arise, or if the employee's ability to perform their duties or fulfil their obligations to Nammo is compromised, such approval will not be granted, or will be withdrawn.

4.8 Purchase of Sexual Services

Nammo is against the purchase of sexual services. Purchase of sexual services may support human trafficking. Human trafficking is illegal and a violation of human rights.

The individual must refrain from buying sexual services when on assignments and business trips for Nammo.

4.9 Intoxicants

Nammo is a drug-free workplace. Accordingly, it is not permitted to be under the influence of intoxicating substances, including alcohol, while at work for Nammo.

Alcohol may, however, be served when the local custom and occasion make it appropriate to do so, and provided that consumption of alcohol will not be combined with operating machinery, driving or any other operation that is incompatible with the use of alcohol.

No individual should use, or encourage others to use, intoxicants in a manner that can place the user, Nammo or any of its business associates in an unfavourable light.



5. Practice and follow-up

5.1 Personal Responsibility

The individual must ensure that they are familiar with and perform their duties in accordance with the requirements set out in this document.

5.2 Managerial Responsibility

Managers are responsible for supporting implementation of the Ethical Code of Conduct and monitoring compliance with the company's values and ethical business conduct guidelines. Managers are responsible for creating an open and honest environment in which employees feel comfortable to bring issues forward.

5.3 Handling Cases of Doubt and Breaches of the Rules

If the individual comes across cases of ethical doubts and breaches of Nammo's ethical requirements, these concerns must be brought to the attention of their superior and/or to the Nammo Ethical Committee.

A manager who receives such a query must consult their own superior in cases of doubt.

The concern may also be addressed to Nammo's Ethical Committee. The individual may remain anonymous if he/she so wishes.

5.4 Ethical Committee

The Ethical Committee shall consist of three persons from the Nammo Group. The Committee shall ensure a strong focus on, common understanding of, and compliance with Nammo's ethical requirements as well as handling the implementation and the follow up of the Ethical Code of Conduct within the Nammo Group.

5.5 Whistleblowers

Nammo will not implement sanctions in any form against any individual who, in a responsible manner, informs persons in positions of responsibility or internal entities about possible breaches of Nammo's ethical guidelines, applicable laws or other blame-worthy circumstances in Nammo's business.

Individuals who come across cases of ethical doubts and breaches of Nammo's Ethical Code of Conduct shall immediately inform Nammo's Ethical Committee.

Contact information at the Nammo Intranet/Corporate.

5.6 Consequences

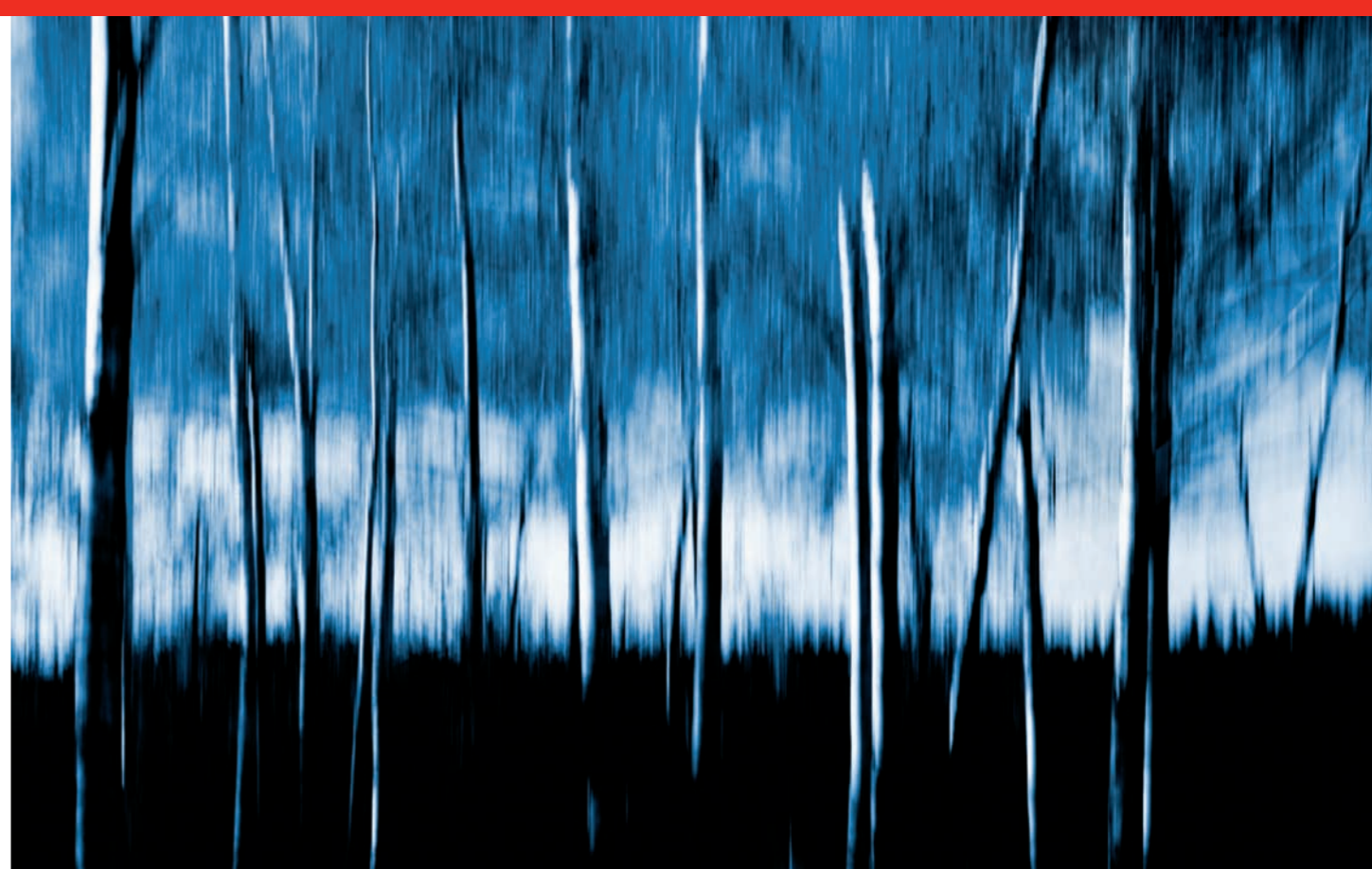
Breaches of the Group's ethical requirements or relevant statutory provisions may result in disciplinary action, or dismissal with or without notice, and may be reported to the relevant authorities.

5.7 Responsibility of Compliance

The Executive Vice Presidents of each business unit, Presidents of subsidiaries and corporate staff entities are responsible for following up action plans for compliance within their own entities.

5.8 Responding to Enquiries from the Media and other Interest Groups

In order to ensure a co-ordinated interface with external parties, general enquiries about Nammo's Ethical Code of Conduct shall be directed to the Corporate Communications Department.



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