

# CODE OF CONDUCT

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# Introduction from the CEO

This Code of Conduct (the Code) outlines how we as a company uphold the highest standards of business ethics, integrity, and professionalism. It applies to all persons engaged in any Olympic activities or present on Olympic premises or vessels, and reflects our shared responsibility to act ethically and responsibly in everything we do.

Our commitment to responsible business conduct is rooted in our core values—being visionary, working as One Team, acting responsibly, and delivering with competence. These values guide our decisions and behaviour, both onshore and offshore, and help us build trust with colleagues, customers, partners, and the communities we serve.

This Code also supports our dedication to the Ten Principles of the UN Global Compact, covering human rights, labour standards, environmental protection, and anti-corruption. It sets clear expectations for ethical behaviour and legal compliance, promoting a culture of integrity, transparency, and accountability across all levels of our organization and among our business partners.

By adhering to this Code, we not only ensure compliance with laws and regulations but also strengthen our reputation, improve operational efficiency, and foster a safe, inclusive, and sustainable work environment. In a complex and evolving maritime industry, this Code is our compass—helping us navigate challenges, make sound decisions, and contribute positively to society.

Let us all take ownership of this responsibility and lead by example.

Fosnavåg 26.05.2026



Stig Permyø  
CEO

# Company Values

Our values are the foundation of who we are and how we work. They guide our actions, decisions, and interactions—both internally and externally. By being visionary, working as One Team, acting responsibly, and always delivering with high competence, we create long-term value for our customers, partners, and society.

- **Visionary**  
“We see opportunities where others see challenges”  
Our ability to look ahead and understand the trends shaping our industry has always been one of our key success factors. This enables us to adapt quickly and effectively. With an innovative and forward-looking approach, we embrace new technologies and solutions that create value—always with an eye on tomorrow’s needs.
- **One Team**  
“Together we create success”  
Our culture is characterized by professionalism, engagement, and strong relationships. Together, we achieve results that exceed what we can accomplish alone. We work closely with customers, colleagues, and partners to deliver the best solutions. Trust, respect, and open communication are the foundation of our work culture.
- **Responsible**  
“We take responsibility—for people, the environment, and safety”  
Through reliability, sustainable choices, and high ethical standards, we ensure safety and security for employees, customers, and the society we are part of.
- **Competent**  
“We set the standard”  
Expertise and quality are our signature. We prioritize knowledge and continuous development, ensuring first-class deliveries through high competence, precision, and pride. This makes us a preferred partner.

# Our responsibility

## **Employee responsibility**

All employees are expected to act with integrity, professionalism, and respect. We must follow laws, internal policies<sup>1</sup>, and uphold the company's reputation in all our actions. This includes adhering to the Code and completing all required training related to the Code and other mandatory training programs.

## **Manager responsibility**

Leaders must lead by example, foster a culture of openness and accountability, and ensure that employees understand and follow this Code.

## **Legal Compliance**

As a company and individuals, we are committed to complying with all applicable laws, regulations, and internal policies. Non-compliance can have serious consequences for individuals and the company.

## **Where to find information or get advice**

Employees should consult their manager or relevant department manager(s) if unsure about any aspect of this Code.

## **Training in the Code**

All employees shall receive and complete training in the Code. This ensures continued awareness and understanding of our ethical standards and responsibilities.

New employees will receive training in the Code as part of their onboarding process, ensuring they are equipped to uphold our values from the very beginning.

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<sup>1</sup> QHSE : Olympic Subsea ASA

## **Consequences of Violation of the Guidelines**

Violations of the Code may result in disciplinary action and warnings; in severe cases this may imply termination of employment or legal consequences.

## **Whistleblowing<sup>2</sup>**

Whistleblowing means reporting unacceptable or unethical circumstances in the business to someone who has the authority to address them. This could include violations of laws, breaches of the Code, unsafe practices, harassment, corruption, or other forms of misconduct within Olympic.

Whistleblowing allows us to identify and correct problems early, before they cause harm to individuals, the company, or society. By speaking up, employees help us maintain a safe, ethical, and transparent working environment.

We are committed to ensuring that:

- All reports are taken seriously and handled confidentially.
- Whistleblowers are protected from retaliation or negative consequences.
- Concerns are investigated fairly and thoroughly.

If you see something that doesn't seem right, we encourage you to speak up—whether to your leader, through our designated whistleblowing channel or report a non-conformance in our TMS system.

<sup>2</sup> WHISTLEBLOWING : Olympic Subsea ASA

## People

**Responsible departments:** HR, Crewing, QHSE

The strength of our company lies in the people who drive our mission forward every day. Creating a safe, inclusive, and respectful work environment is not just a moral obligation; it is essential to our long-term performance and resilience.

This chapter outlines the standards of behaviour we expect and the shared responsibilities of the company and each individual in fostering a positive and ethical workplace.

## **Behavior at work**

### **(Teamwork, Transparency, Responsibility)**

Professional, respectful, and responsible behaviour is the foundation of a strong and collaborative workplace culture. How we act—toward colleagues, partners, and clients—shapes our working environment and reflects our values.

- **Company Responsibility:**  
We promote a culture of collaboration, openness, and mutual respect. The company is responsible for creating an environment where teamwork is encouraged, transparency is valued, and everyone is held accountable for their actions.

- **Individual Responsibility:**  
Employees are expected to treat colleagues with respect, communicate openly and honestly, and take ownership of their work. Everyone shall contribute to a positive and productive workplace.

### **Health, Safety, and Environment (HSE)**

Protecting the health and safety of our crew, employees, contractors, and partners is a top priority. We are committed to maintaining a safe and healthy working environment across all our operations—onshore and offshore. This commitment extends beyond legal compliance; we strive to exceed regulatory requirements wherever possible to ensure the well-being of everyone involved in our business.

- **Company Responsibility:**  
We work proactively to minimize the risk of accidents, injuries, and health hazards associated with our operations. This includes implementing robust safety systems, conducting regular risk assessments, and continuously improving our HSE performance. We provide comprehensive training and education in occupational health and safety, environmental protection, and

the handling of hazardous and non-hazardous materials and waste. We also promote awareness of environmental risks and encourage sustainable practices throughout the organization.

- **Individual Responsibility:**  
Every employee has a duty to contribute to a safe and environmentally responsible workplace. This means following all safety procedures, using protective equipment correctly, reporting unsafe conditions or incidents, and participating in training. Employees are also expected to align with our environmental policies and take personal responsibility for minimizing their environmental impact.

### **Upholding Human and Workers Rights**

We are committed to respecting the human rights set out in the UN Universal Declaration of Human Rights and the core labor standards of the International Labour Organization (ILO), guided by the UN Guiding Principles on Business and Human Rights.

We uphold:

- Freedom of association and collective bargaining
- Elimination of forced and child labor
- Non-discrimination in employment
- Protection against modern slavery and exploitation in our operations and supply chain

- **Company Responsibility:**

We conduct human rights due diligence to identify, prevent, and mitigate risks. We expect our suppliers and partners to uphold the same standards. We also provide training and guidance to ensure awareness and compliance across the organization.

- **Individual Responsibility:**

Employees are expected to treat others with dignity and respect, support a fair and inclusive workplace, and report any concerns related to human or labour rights violations. Everyone has a role in upholding these rights and contributing to a responsible and ethical work environment.

**Fair treatment**

We believe that a diverse, equitable, and inclusive workplace is essential to our success. Embracing different backgrounds, perspectives, and experiences strengthens our teams, drives innovation, and reflects the global nature of our operations. Equity ensures that everyone has access to the same opportunities, while inclusion fosters a culture where all individuals feel respected, valued, and empowered to contribute.

- **Company Responsibility:**

We are committed to building a diverse and inclusive workplace where everyone has equal opportunities. Discrimination or exclusion based on gender, ethnicity, religion, age, disability, or other protected characteristics is not tolerated.

- **Individual Responsibility:**

Employees must treat all colleagues fairly and respectfully and contribute to an inclusive culture by valuing different perspectives and experiences.

**Bullying and Harassment**

Everyone has the right to work in an environment free from bullying, harassment, and other forms of abusive behaviour. This is especially important in the maritime industry, where seafarers often live and work in closely for extended periods, sometimes under stressful and isolated conditions. These unique circumstances can increase the risk of interpersonal conflict and make it more difficult to report or escape harmful behaviour.

We are committed to fostering a respectful and supportive workplace culture—onshore and at sea—where all individuals feel safe, valued, and heard. Bullying and harassment in any form, whether verbal, physical, psychological, or sexual, will not be tolerated.

- **Company Responsibility:**

We take proactive steps to prevent bullying and harassment through awareness campaigns, regular training, and ensuring that clear policies and reporting mechanisms are in place. We are committed to responding promptly and fairly to all concerns raised and to protecting those who speak up from retaliation. We have zero tolerance for bullying, harassment, or any form of abusive behaviour and provide reporting mechanisms to address such issues.

- **Individual Responsibility:**

Employees must treat others with respect and dignity, refrain from any form of harassment, and report inappropriate behaviour. Creating a culture of respect is a shared responsibility.

**Compensation**

Fair and competitive compensation is essential to attracting, retaining, and motivating skilled and dedicated employees. Ensuring compliance with applicable labour laws and collective agreements is also a fundamental part of our commitment to fair employment practices.

- **Company Responsibility:**

We are committed to offering compensation that is fair, transparent, and aligned with industry standards, CBAs and legal requirements. Pay decisions are based on qualifications, responsibilities, performance, and market conditions.

- **Individual Responsibility:**

Employees are expected to perform their duties with

professionalism and integrity, contributing to the company's success and upholding our values.

### **Alcohol and Drugs**

Maintaining a workplace free from the influence of alcohol and drugs is essential to ensuring safety, sound judgment, and high performance—especially in the demanding environments of offshore operations. Substance use that impairs an individual's ability to work safely or responsibly will not be tolerated.

- **Company Responsibility:**  
We maintain a drug- and alcohol-free workplace to ensure safety and performance. We provide support for employees dealing with substance abuse issues.
- **Individual Responsibility:**  
Employees must not be under the influence of alcohol or drugs while at work or during work-related activities. Employees dealing with substance abuse issues have a responsibility to seek support. Violations may result in disciplinary action.

### **Social Media**

Social media is a powerful tool for communication, but it also carries risks. What employees share online can reflect on the company's reputation. Responsible use of social media is essential to protect both personal and corporate integrity. All personnel shall follow our Social Media Policy<sup>3</sup>

- **Company Responsibility:**  
We provide guidance on responsible use of social media to protect the company's reputation and confidential information.
- **Individual Responsibility:**  
Employees must use social media responsibly, avoid sharing sensitive information, and refrain from posting content that could harm the company or colleagues.

### **Sexual Services and Gambling**

Engaging in or promoting illegal or unethical activities, such as the purchase of sexual services or compulsive gambling, is incompatible with our values and responsibilities. These behaviours can compromise safety, judgment, and the company's reputation, and will be addressed seriously.

- **Company Responsibility:**  
We do not tolerate involvement in illegal or unethical activities, including the use of sexual services or gambling that affects work performance.
- **Individual Responsibility:**  
Employees must avoid engaging in behaviour that could damage the company's reputation or impair their ability to perform their duties.

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<sup>3</sup> QHSE - Olympic Subsea ASA

## Climate and Environment

**Responsible:** COO, Chief QHSE & Crewing Officer

Our responsibility toward the environment is a core part in how we operate. As a shipowner in the blue energy sector, we recognize that our long-term success depends on the sustainability of our natural ecosystems. We are committed to reducing our climate and environmental footprint and contributing to a just energy transition. We aim to create value for our stakeholders while using fewer resources and generating less pollution. This means continuously improving the environmental performance of our fleet, reducing emissions, and ensuring eco-efficient operations across all areas of our business.

## **Climate and Emissions**

Climate change directly affects the oceans we operate in and the long-term viability of our industry. We have a responsibility to reduce our greenhouse gas emissions and adapt to climate-related risks.

- **Company Responsibility**  
We work actively to reduce GHG emissions from our vessels and operations and prepare for physical climate risks. We align our climate actions with international agreements and national climate targets and to have a net zero fleet by 2050.
- **Individual Responsibility**  
Employees are expected to support energy-saving measures, follow procedures that reduce emissions, and report any climate-related risks or incidents they observe.

## **Pollution Prevention**

Our maritime operations can contribute to pollution, affecting marine life, human health, and our company's reputation. Preventing pollution is a shared responsibility.

- **Company Responsibility**  
We minimize air and water pollution by complying with regulations and applying best available practices and technologies. We maintain ISO 14001 certification, monitor and report emissions, manage hazardous substances responsibly, and work to reduce microplastic pollution across our value chain.
- **Individual Responsibility**  
Employees must handle oils, chemicals and waste properly, prevent spills, and report pollution incidents. They should also help reduce microplastic pollution by following procedures and supporting responsible sourcing and material use.

## **Protecting Marine Life and Ecosystems**

Healthy marine ecosystems are essential to ocean life and the sustainability of our operations. We are committed to protecting the biodiversity and habitats affected by our activities.

- **Company Responsibility**  
We minimize our impact on marine and coastal ecosystems by reducing underwater noise and planning operations responsibly. We also prevent the spread of invasive species through ballast water treatment, biofouling control, and compliance with environmental regulations.
- **Individual Responsibility**  
Employees must follow environmental procedures, respect protected areas, and report any activity that may harm ecosystems. This includes following ballast water and hull cleaning protocols to help prevent the transfer of invasive species.

## **Resource Efficiency and Circular Practices**

Using resources efficiently helps reduce our environmental footprint and supports a more circular economy across the vessel lifecycle.

- **Company Responsibility**  
We reduce waste, promote reuse and recycling, and support responsible ship recycling in line with industry standards. In shipbuilding, we aim to lower emissions and resource use by choosing sustainable materials, efficient designs, and responsible suppliers.
- **Employee Responsibility**  
Employees should avoid unnecessary waste, sort materials correctly, and support resource efficiency in daily operations. Those involved in vessel projects must consider environmental impact in design, procurement, and refit decisions

## Prosperity

**Responsible:** CFO and VP finance and accounting

Sustainable prosperity is built on trust, transparency, and responsible business practices. As a company operating in a global and highly regulated industry, we are committed to conducting our business with integrity and in full compliance with financial, legal, sustainability and ethical standards. This strengthens our reputation, supports long-term value creation, and ensures we contribute positively to the societies in which we operate.

### **Transparent, Accurate, and Complete Reporting**

Transparent and reliable reporting is essential to maintaining trust with stakeholders, ensuring regulatory compliance, and supporting sound decision-making. This includes not only operational and performance data but also financial, sustainability and accounting information.

- **Company Responsibility:**  
We are committed to maintaining high standards in our accounting and financial reporting practices. This includes:
  - Ensuring that all records are accurate, complete, and prepared in accordance with applicable accounting standards and legal requirements.
  - Implementing internal controls to prevent errors, fraud, and misstatements.
  - Providing training and guidance to employees involved in financial reporting to ensure consistency and compliance.

- **Individual Responsibility:**  
Everyone involved in providing information for reporting purposes is expected to contribute with correct and timely data. Employees must ensure that all entries, records, and reports are truthful, properly documented, and not misleading. Any discrepancies or concerns must be reported immediately. Integrity in accounting is not only a legal obligation—it is a cornerstone of our ethical business conduct.

### **Tax**

Paying taxes responsibly is a fundamental part of our contribution to society. As a company with global operations, we are committed to complying with all applicable tax laws and regulations in the countries where we operate. Transparent and ethical tax practices support public trust, ensure legal compliance, and reflect our broader commitment to responsible business conduct.

- **Company Responsibility:**

We comply with all applicable tax laws and regulations in the jurisdictions where we operate. We do not engage in aggressive tax planning or practices that undermine public trust.

- **Individual Responsibility:**

Employees must support accurate tax reporting and avoid any actions that could result in non-compliance or reputational harm.

### **Anti-Money Laundering (AML)**

Preventing money laundering is essential not only for legal compliance but also for protecting society. Money laundering enables serious crimes like corruption, trafficking, and terrorism. By stopping it, we help safeguard communities, promote fair business, and support global financial stability.

We are committed to preventing money laundering and the financing of illegal activities. This means staying alert to suspicious behaviour, conducting proper due diligence, and reporting concerns. AML is not just a legal requirement—it's essential to protecting our integrity and reputation.

- **Company Responsibility:**

We are responsible for maintaining effective AML procedures, conducting due diligence on partners and transactions, monitoring for suspicious activity, and providing regular training to employees.

- **Individual Responsibility:**

Employees must follow AML procedures, complete required training, and report any suspicious behaviour or transactions. No one must ever knowingly engage in or facilitate money laundering

## Responsible Business Conduct and Integrity

**Responsible:** Management team

Integrity is the foundation of our business. Acting ethically and responsibly protects our reputation, builds trust, and ensures we meet our legal and social obligations.

Every decision we make reflects who we are as a company and how we contribute to a fair and sustainable society.

### Meet Legal and Regulatory Obligations

Operating in a global industry means navigating complex legal environments. Compliance with laws and regulations is not only a legal requirement—it's essential to maintaining our license to operate and our reputation as a responsible company.

- **Company Responsibility:**

We are responsible for ensuring that our operations comply with all applicable laws and regulations. This includes providing employees with clear policies, training, and support to understand and meet legal requirements.

- **Individual Responsibility:**

Employees must follow all relevant laws, regulations, and internal policies in their daily work. When in doubt, you are expected to seek guidance to ensure full compliance and avoid legal or reputational risks.

### Conflicts of Interest

Conflicts of interest arise when personal interests interfere with professional responsibilities. Even the appearance of a conflict can damage trust and credibility. Managing these situations transparently is essential to maintaining integrity in decision-making.

- **Company Responsibility:**

We provide clear guidance and procedures for identifying and managing conflicts of interest. Leaders are expected to foster a culture of openness and ensure that decisions are made objectively and without bias.

- **Individual Responsibility:**

Employees must avoid situations where personal interests could affect their judgment or actions at work. Any potential conflicts

must be disclosed promptly, and employees must not participate in decisions where you have a personal stake.

Example:

#### Hiring or Contracting Family Members

- **Scenario:** An employee is involved in selecting a vendor and recommends a company owned by a relative.
- **Action:** Disclose the relationship and recuse oneself from the decision-making process to ensure impartiality.

### Protect Company Information / Confidentiality

Confidential information includes business strategies, personal data, and proprietary knowledge. Mishandling this information can lead to legal consequences, competitive disadvantage, and loss of trust.

- **Company Responsibility:**

We are responsible for implementing policies and systems that protect confidential information. This includes limiting access to sensitive data, providing training, and ensuring that information is handled in accordance with legal and contractual obligations.

- **Individual Responsibility:**

Employees must protect confidential information and only share it with authorized individuals. You are expected to handle sensitive data with care, avoid discussing it in inappropriate settings, and report any breaches or concerns immediately.

### **Prevent Fraud**

Fraud undermines trust, damages financial health, and can lead to legal action. Preventing fraud is essential to protecting the company and its stakeholders. We have zero tolerance for fraud. Employees must act honestly and report any suspected fraudulent activity.

- **Company Responsibility:** We are responsible for implementing effective controls to detect and prevent fraud. This includes promoting awareness, providing training, and ensuring that all reports of suspected fraud are taken seriously and investigated thoroughly.

- **Individual Responsibility:**

Employees must act with honesty and integrity in all business dealings. You are expected to report any suspected fraudulent activity immediately and must never engage in or support any form of deception or misrepresentation.

### **Fair Competition**

Fair and ethical competition is essential to maintaining trust, protecting our reputation, and ensuring a level playing field for all market participants. We are committed to conducting our business in full compliance with all applicable competition laws and regulations in every jurisdiction where we operate.

- **Company Responsibility:** We promote a healthy and transparent competitive environment by avoiding anti-competitive practices such as collusion, price fixing, bid rigging, and market manipulation. While we engage in industry forums and trade associations, we ensure that our participation does not compromise competition laws. We also avoid partnerships in countries subject to trade boycotts by the UN or the Norwegian Government, and refrain from engaging with industries or companies that are widely boycotted due to

negative social, environmental, or ethical impacts. We expect the same level of compliance from our suppliers and partners.

- **Individual Responsibility:**

Employees must never engage in discussions or agreements with competitors that could restrict competition. This includes sharing sensitive information or coordinating pricing, markets, or customers. Employees are also expected to be aware of and avoid any business relationships that could violate trade sanctions or ethical standards. When in doubt, seek guidance from your manager.

### **Anti-Corruption**

Corruption and bribery distort fair competition, undermine trust in institutions, and divert resources away from communities and public services. They can lead to poor decision-making, legal penalties, and long-term reputational damage. In the maritime and energy sectors, corruption can also compromise safety, environmental standards, and international cooperation. Upholding integrity in all business dealings is essential to maintaining credibility, ensuring compliance, and contributing to a more just and transparent global economy.

- **Company Responsibility:**

We are committed to a zero-tolerance approach to corruption. This includes:

- Establishing and enforcing clear anti-corruption policies and procedures.
- Conducting regular risk assessments and due diligence on business partners, agents, and intermediaries.
- Providing mandatory training and awareness programs for employees
- Monitoring high-risk transactions and business areas.
- Ensuring that reporting mechanisms are accessible, confidential, and trusted.

- o Taking prompt and consistent action in response to violations or concerns.

- **Individual Responsibility:**

Employees must never offer, give, request, or accept bribes or improper advantages—whether directly or through third parties. All business decisions must be made ethically and in the best interest of the company. Employees are expected to report any concerns or suspected violations immediately through the appropriate channels.

### Gifts & Hospitality

Gifts and hospitality can help build professional relationships, but if not handled properly, they may create a perception of bias or improper influence. Inappropriate or excessive exchanges can undermine trust, compromise decision-making, and expose the company to ethical and legal risks. Gifts and hospitality must be modest, infrequent, and not intended to influence business decisions.

- **Company Responsibility:**

We are responsible for setting clear guidelines on what constitutes acceptable gifts and hospitality. This includes ensuring transparency, monitoring compliance, and providing training to help employees navigate situations where professional boundaries may be tested.

- **Individual Responsibility:**

Employees must only offer or accept gifts or hospitality that are modest, infrequent, and clearly not intended to influence business decisions. Any offers that may appear inappropriate or excessive must be declined and reported. When in doubt, employees should seek guidance from their manager.

Type of gift or hospitality	Typical Threshold in Norwegian Practice	Notes
<b>Gifts</b>	NOK 300–500	Small tokens (e.g. flowers, branded items). Anything above may be declined or reported.
<b>Meals &amp; Hospitality</b>	NOK 1,000–1,500 per person	Acceptable if occasional and clearly business-related.
<b>Travel/Accommodation</b>	Must be pre-approved and business-related	Should not include leisure or luxury elements.

### Cyber Security

Cyber security is critical to protecting our systems, data, and operations from unauthorized access, disruption, or misuse. Cyber threats can lead to data breaches, financial loss, reputational damage, and operational downtime. As digital technologies become more integrated into our work, maintaining strong cyber security is essential to business continuity and stakeholder trust.

- **Company Responsibility:**

We are responsible for maintaining secure IT systems and infrastructure, implementing access controls, and monitoring for cyber threats. This includes providing employees with training, clear policies, and tools to recognize and respond to cyber risks. We continuously assess and improve our cyber security measures to stay ahead of evolving threats.

- **Individual Responsibility:**

Employees must follow all IT security policies and procedures, including the safe use of devices, strong password practices, and secure handling of data. You are expected to remain alert to phishing attempts, suspicious activity, and potential breaches, and to report any concerns immediately. Everyone plays a role in protecting the company's digital environment.

## Responsible use of AI

Artificial Intelligence (AI) offers powerful opportunities to improve how we work, solve problems, and serve our stakeholders. However, its use also brings ethical and practical responsibilities. We may use AI to enhance decision-making, improve efficiency, and support our employees and customers. With these benefits come responsibilities to ensure AI is used ethically, transparently, and in alignment with our values.

- **Company Responsibility**  
We are responsible for ensuring that AI tools are used in a way that aligns with our ethical standards and legal obligations. This includes:
  - Selecting AI solutions that meet our expectations for fairness, transparency, and data protection.
  - Ensuring employees understand how to use AI responsibly through guidance and awareness.
  - Monitoring AI use to identify and address potential risks or unintended consequences.
- **Employee Responsibility**  
Employees must use AI tools thoughtfully, understand their limitations, protect data privacy, and report any concerns about misuse or unintended consequences.

## Privacy

Respecting privacy is a legal and ethical obligation. Mishandling personal data can harm individuals, breach trust, and result in regulatory penalties. As we handle sensitive information about employees, customers, and partners, protecting privacy is essential to maintaining credibility and compliance.

- **Company Responsibility:**  
We are responsible for ensuring that personal data is collected, stored, and processed in accordance with applicable data protection laws. This includes implementing appropriate

safeguards, providing clear policies, and offering training to ensure that privacy is respected across all operations.

- **Individual Responsibility:**  
Employees must handle personal data with care and only use it for legitimate business purposes. You are expected to follow internal privacy policies, protect data from unauthorized access or disclosure, and report any suspected breaches or concerns immediately.

## Company Assets

Company assets—including equipment, vehicles, digital tools, and facilities—are essential to our operations and success. Misuse, neglect, or unauthorized use of these resources can lead to inefficiency, financial loss, and security risks. Responsible use ensures that assets are available, protected, and used in a way that supports our business goals.

- **Company Responsibility:**  
We are responsible for providing employees with the tools and resources needed to perform their work effectively. This includes maintaining assets in good condition, setting clear usage guidelines, and monitoring for misuse or loss.
- **Individual Responsibility:**  
Employees must use company assets responsibly, efficiently, and only for authorized business purposes. You are expected to take care of equipment, report any damage or misuse, and avoid using company resources for personal gain or non-work-related activities.

### Sanctions and Trade

International trade laws and sanctions are designed to promote global security, prevent illegal activity, and uphold international agreements. Violating these regulations can result in severe legal consequences, financial penalties, and reputational harm. As a global company, we must ensure that our operations, transactions, and partnerships comply fully with all applicable trade laws.

- **Company Responsibility:**  
We are responsible for implementing systems and controls to ensure compliance with relevant trade sanctions and export control regulations. This includes screening business partners, monitoring transactions, and providing employees with training and guidance on relevant legal requirements.
- **Individual Responsibility:**  
Employees must follow all procedures related to trade compliance and sanctions. You are expected to stay informed about restrictions that may apply to their work, avoid engaging in prohibited transactions, and report any concerns or potential violations immediately to their manager.

### Political Donations, Sponsorships, Lobbying

Responsible corporate political engagement contributes to a well-functioning democracy and a stable, sustainable business environment. However, political donations and sponsorships must be handled with transparency and care to avoid the perception of undue influence or conflicts of interest. Clear boundaries help protect our integrity and public trust.

- **Company Responsibility:**  
We are responsible for upholding the highest standards of integrity and transparency in all our political engagements. If political donations are made, they must comply with all applicable laws and regulations and be disclosed as required by law. All lobbying activities must also be transparent and lawful. Sponsorships must align with our values, serve a legitimate purpose, and follow internal approval processes.
- **Individual Responsibility:**  
Employees must not make political donations or commitments on behalf of the company unless explicitly authorized. Any proposed sponsorships must be reviewed and approved through the appropriate channels. Employees are expected to ensure that all political and sponsorship activities are lawful, transparent, and aligned with the company's values and ethical standards.

### Exposure to controversial weapons

Our organization avoid being linked to companies directly involved in the production, sale, or financing of controversial weapons.

## Business Partners

**Responsible:** COO, VP HR, CCO

Building and maintaining strong, respectful relationships with our business partners is essential to achieving long-term success. These partnerships are built on trust, transparency, and shared values. By conducting business responsibly and ethically at every level, we not only protect our reputation but also contribute to a more sustainable and resilient industry.

### **Responsible Value Chain**

Our commitment to ethical and sustainable business practices extends beyond our own operations to include the entire value chain. We expect our suppliers, contractors, and other business partners to uphold the same high standards of integrity, responsibility, and compliance that we set for ourselves.

- **Company Responsibility:**

We are responsible for conducting due diligence on our business partners to ensure they operate ethically and in accordance with applicable laws and regulations. This includes assessing environmental, social, and governance (ESG) risks, integrating sustainability criteria into procurement processes, and promoting transparency and accountability throughout the value chain. We include clear expectations in contracts and collaborate with partners to drive continuous improvement in areas such as human rights, labour conditions, environmental performance, and anti-corruption.

- **Individual Responsibility:**

Employees involved in selecting, managing, or working with business partners must ensure that ethical standards are upheld at every stage of the relationship. This includes considering ESG

factors in decision-making, reporting any concerns about a partner's conduct, and supporting efforts to build a responsible and resilient supply chain. Everyone has a role in fostering partnerships that reflect our values and contribute to sustainable development.

### **Local Communities**

We aim to be a positive force in the communities where we operate. Our presence should contribute to local development, respect cultural values, and support long-term prosperity and well-being.

- **Company Responsibility:**

We engage with local stakeholders to understand their needs and concerns. We support community initiatives, create local employment opportunities, and minimize negative impacts from our operations.

- **Individual Responsibility:**

Employees are encouraged to participate in community engagement activities and act as ambassadors of the company's values. Respect for local customs and open dialogue with community members are essential.