

Code of conduct Ocab Group

Words from the CEO

You hold our code of conduct in your hand. The purpose of the code of conduct is to ensure that we act correctly in our daily work in accordance with Ocab's values Proactive, Quality-driven and Caring.

For us at Ocab, the laws and regulations that exist in the countries in which we operate are an obvious starting point for how we act, but there are areas where we as a company have higher ambitions. When we do business and when we conduct our business, we must do so in a healthy and ethically defensible manner.

The code of conduct includes guidance regarding the laws and regulations that Ocab and we as employees, management and board must relate to, but also guides where the expectations - both internal and external - go beyond the statutory obligation. It clarifies which behaviours we should act based on in different business situations, how we act towards our colleagues, customers, business partners or suppliers.

Ocab has a clear target when it comes to ethics: we strive for zero ethical violations. For example, we do not tolerate any forms of corruption, bribery, unfair anti-competitive measures, discrimination, harassment or unnecessary environmental impact. All this is described in our code of conduct.

This is work we do together, every day. And it all starts with ourselves, and how we act towards each other and the world around us. It is therefore important that we all understand the meaning of the Code and how it should be applied. If there is anything that is unclear, you can always ask your immediate manager or me.

Pål Nygaard
Group CEO, Ocab



About the code of conduct

The code of conduct, hereinafter "the Code", applies to all companies within the Ocab Group Holding group, hereinafter collectively referred to as "Ocab". The ultimate responsibility for implementing the Code rests with the heads of the respective countries.

The code was developed by Ocab's board of directors (hereinafter "the Board"). The Board expects that all employees have read, understood and follow the code of conduct, policies, current national and international legislation. The code aims to make it easier for employees to make decisions in their daily work.

Employees must follow the principles and the underlying purpose of the Code. The Code must be followed, not only to the letter, but also as general guidance for decisions on matters not expressly regulated in the Code.

The code of conduct is an extension of Ocab's values:

- **Proactive:** We think ahead, act and get things done
- **Quality-driven:** We do it right, learn and share best practice.
- **Caring:** We care about our colleagues, our customers and our planet.

If situations arise where the Code does not provide guidance, the following questions can help the employee make the right decision:

- Is my behaviour in line with Ocab's values?
- Would a colleague, client or my manager consider my behaviour appropriate?
- Would my actions withstand media scrutiny without damaging Ocab's brand?

If you are still unsure you can also ask your immediate manager. All employees at Ocab are educated and informed about the Code and have a responsibility and an obligation to follow the Code.

In addition to Ocab's values, the Code is also based on the ten principles of the UN Global Compact and the ILO core conventions for international conventions and human rights, www.unglobalcompact.org. These principles are fundamental to long-term, sound and transparent business ethics.

You are expected to promote a culture characterized by joy and security. As a manager and leader, you have an extra responsibility for our employees' well-being, happiness and safety.

In addition to the Code, Ocab also has a whistleblower function.

Anyone who suspects an impropriety, which conflicts with Ocab's values, the Code or legislation, must have the opportunity to speak up without fear of reprisals. More information and instructions can be found in our Whistleblower Policy.

Human rights, work environment and safety

Ocab has signed the ten principles of the UN's Global Compact and the ILO's core conventions for international conventions and human rights. We strive for a good working environment and offer

the same work opportunities to all individuals without distinction or discrimination due to age, gender, religion, sexual orientation, functional diversity, political opinion or ethnic affiliation. At Ocab, all employees, regardless of gender, have the same opportunity to combine parenthood with work and take parental leave.

Ocab respects the employees' right to form and join the unions they wish and to bargain collectively. Ocab does not accept any form of mental or physical punishment, threat of punishment, discrimination in employment or work, bullying in the workplace, or any other form of harassment, forced or involuntary labour.

Ocab works to ensure that all employees are offered a safe and healthy working environment, both physical and psychosocial. We work preventively with risks. Safety thinking characterizes the work from idea to implementation and delivery. We work consciously and systematically for a good working environment, both physically and mentally.

We have zero tolerance regarding the influence of alcohol and drugs at work. We are a role model in traffic and contribute to a safe traffic environment. Ocab has a vision of zero serious accidents in the business, which includes that all employees have the right information, equipment and training for their respective work.

Environmental and climate work

We work to prevent and reduce the negative environmental impact the operations can have on the environment. Ocab strives to conduct its business in an environmentally sustainable manner and to comply with or exceed the requirements set forth in laws, regulations and international agreements regarding the reduction of emissions and discharges into air, land and water.

Our services, products and processes must be designed so that energy, natural resources and raw materials are used efficiently and that the amount of waste and residual products is reduced.

Ocab must avoid materials and methods that pose risks to the environment when there are other available and suitable alternatives, for example by pursuing circular solutions instead of demolishing and building new.

Conflicts of interest

We avoid situations that could involve conflicts of interest between the employee and Ocab. A conflict of interest arises when the employee's private interests interfere, or has the appearance of interfering, in any way with the legitimate interests of Ocab.

Non-exhaustive examples of conflicts of interest are (a) engaging in any activity that is in competition with our Group; (b) engaging the services of family members or friends solely based on the personal relationship; (c) purchasing services or equipment from a company in which the decision-making Employee has an interest in.

Conflicts of interest are strictly prohibited, unless approved by manager and the country CFO. If the decision involves a member of country

In this context, employees also mean spouses, cohabitants or other related persons. If, for example, an employee's spouse works as a buyer at a company that has Ocab as a supplier, there is a risk of a conflict of interest. The report must then be made to the immediate manager and handled according to established procedures.



management the Group CEO must approve, and if it involves a member of Group Management the chairman of the board of directors must approve.

All decisions must be made and based on what is best for the company and not on personal considerations or relationships. Therefore, employees must avoid potential conflicts of interest, inform their manager when there is a potential conflict, and recuse themselves from conflicted decisions. Employees may not have assignments outside of Ocab that are in conflict with, or could conceivably be in conflict with, the company's interests without the approval of the immediate manager. This applies to assignments both with and without compensation. The duty of loyalty also applies during the notice period.

Co-ownership in customers, suppliers or competitors must be notified in writing and granted by the manager. The reporting obligation also applies to employees' side jobs, provided that the side job may involve a conflict of interest. There is no obligation to report when acquiring listed shares to a smaller extent.

Business relationships and corruption

Ocab strives to promote free competition and good business ethics and does not accept any form of undue restriction of competition. Ocab must not exchange information or enter into contracts or agreements with competitors, customers or suppliers in a way that risks hindering, limiting or distorting competition in the market.

We follow the customer's ethical rules, safety instructions and other rules of conduct when we perform our services.

Ocab and its employees may never give gifts, benefits or any other form of unauthorized compensation in relation to customers, suppliers, authorities or other decision-makers to obtain or retain business.

Ocab employees may also not accept gifts, benefits or other forms of remuneration from customers, suppliers or other parties that could affect the objectivity of their decision-making.

Ocab complies with laws, regulations and applies clear rules regarding gifts, services or other benefits that have an unreasonable value and can be considered bribes, kickbacks or that could inconvenience Ocab or the employee if it becomes public knowledge. Ocab does not participate in tax or environmental crimes.

Ocab must inform its customers, subcontractors and partners about our code of conduct for suppliers. Business decisions are based on what is best for the business without regard to personal relationships or interests.

Communication and information

At Ocab, we are open and communicate in a way that reflects our values, without revealing confidential or sensitive information that could harm the company or the company's customers. Our basic principle is that the information should be easy to reach and easy to understand. All our communication must be service-focused, transparent and clear both internally and externally. Ask your immediate supervisor if you are unsure about what you have the right to do and what is permitted within the scope of your employment

Mass media are always referred to the respective regional manager, Group CEO and communications manager.

Confidential Information

Confidential information refers to information about the company, its customers and suppliers that is of such a nature that it would cause disadvantage or damage to Ocab, its customers or suppliers if the information is passed on to outsiders.

At Ocab, we value the protection of personal data and the protection of privacy. We do not disseminate such information that may be perceived as a violation of personal integrity and is not necessary for the performance of the assignment. Confidential information about employees must be stored securely and only disclosed to persons authorized to receive information. Confidentiality always applies in personal matters. It is forbidden to film or photograph someone without consent.

Our IT and data systems must only be used for work-related purposes. It is thus not permitted for any individual user within the group to deviate from the requirements set in the locally drawn up overall instructions.

Violation of the Code

All employees are encouraged to report suspected violations of applicable laws and regulations or the Code. The report can be made to the employee's immediate manager or via Ocab's Whistleblowing service. Anonymous reports are also accepted. All reports are investigated. Ocab does not accept any form of discrimination against or other negative consequences for people who have reported suspected violations in good faith. Violations of the Code may lead to employment law action, including termination of employment or dismissal, and in cases of wilful misconduct or fraud, reporting to the police.

We create good conditions and opportunities by:

- continuously evaluate and prevent risks in and connected to our operations
- constantly strengthen awareness and competence through employee training to create commitment, understanding and responsibility in making well-founded decisions in daily work
- provide guidelines and essential documentation that make it easy to do the right thing
- lead a sustainable and healthy development
- Ocab places the same high demands on subcontractors, partners and other actors as on its own operations



Pål Nygaard
Group CEO Ocab

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