

OUR CODE OF CONDUCT

TOGETHER WITH
INTEGRITY



Effective Date: May 11, 2026

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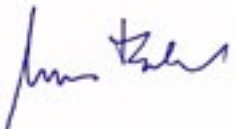
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MESSAGE FROM MARCOS

We are a global technology company, committed to driving energy innovation for a balanced planet. At Envirex Group, this means we inspire and enable our people to be exceptional, to solve impossible challenges with our technology, and to deliver differentiated value for all our stakeholders with our high performance. Together, these values define our company and inform the behaviors that govern everything we do. And one of the most important behaviors that protects and preserves our industry-leading reputation is that we always act with integrity.

But what does it mean to act with integrity across the diverse business environments in which we operate? Our Code will provide you with the information and empowerment you need to focus on what matters most and to navigate any ethical challenge you might face at Envirex Group. This is more than a book of rules. It is our cultural framework in action, enabling us all to work with integrity and deliver on our purpose: Together, we create amazing technology that unlocks access to energy for the benefit of all.

Thank you,



Marcos Guimaraes Bernardes, Envirex Group Managing Director



TOGETHER WITH INTEGRITY

EVERY ONE OF US IS RESPONSIBLE FOR KNOWING, UPHOLDING – AND REPRESENTING – THIS CODE.

What We Expect of Each Other

Integrity can take years to build, but it can be lost in a moment. We need to be purposeful and thoughtful about how we represent Envirex Group to others.

- Live our purpose, values, and behaviors every day
- Know and follow the Code
- Aim to do the right thing, the first time, every time
- Don't engage in actions unless you are sure they are ethical
- **Speak up:** ask questions and raise concerns when issues arise

We deliver high-quality technology and services worldwide, and we always follow the laws of the different countries in which we work. Sometimes these laws vary from place to place and could even conflict. This Code is your guide to help you navigate and understand what is expected of you.

Our Code and the Envirex Group internal requirements represent the standard of business care expected everywhere we work, from everyone who works for Envirex Group, even when local laws are less developed or less stringent.

This Code and its underlying principles apply to all Envirex Group employees, officers, directors, and contractors, worldwide. We also expect our vendors, suppliers, agents, and other third-party business partners working on our behalf to comply with our Code and uphold our high ethical standards.



Ethics

If it cannot be done ethically, we will not do it.



Speak Up

We are all empowered to raise ethical concerns.



Teamwork

We work together with integrity.



Integrity is a Team Effort

Whether you are a senior manager, or this is your first week at Envirex Group, you are empowered to openly discuss and raise questions about ethics and compliance. Take pride in performing with integrity and raise concerns about conduct that doesn't represent our values. Remember that achieving integrity together is a team effort – we must all encourage each other to meet our targets with integrity and never pressure our colleagues into ethical short cuts.

OUR VALUES DRIVE OUR CULTURE FORWARD

OUR CULTURE IS THE FOUNDATION OF EVERYTHING WE DO, AND IT STARTS WITH OUR VALUES.

We Value People

Because our exceptional and diverse people are the pulse and spirit of who we are.

We Value Technology

Because our passion for exploring enables us to solve the world's energy challenges.

We Value Performance

Because together we deliver outstanding results to build a sustainable future.

Our Behaviors

We are safe

Our Behaviors

We are pioneers

Our Behaviors

We act with integrity

We are inclusive

We innovate together

We deliver today and tomorrow

We respect work and personal life

We experiment, learn, and grow

We focus on what matters most



Integrity in Action

Words are important, but our behaviors provide the best evidence of our shared values and integrity.

YOUR VOICE MATTERS

THIS CODE EMBODIES OUR VALUES, ESTABLISHES OUR EXPECTATIONS, AND ACTS AS A GUIDE TO HELP YOU ADDRESS ANY CHALLENGE YOU MAY ENCOUNTER. ACTING IN LINE WITH OUR CODE BUILDS TRUST WITH OUR CUSTOMERS, COMMUNITY, AND STAKEHOLDERS AND HONORS OUR SHARED VISION OF WHO WE ARE AND HOW WE WORK.



Speak Up

We all feel a sense of ownership at Envirex Group. If we see something that is not working, we want to fix it. If something can be better, we try to improve it.

The same applies to integrity. **If you see something wrong – something that goes against our values and the principles in this Code – you must speak up.**

Sometimes it isn't easy to figure out the right thing to say or do, but you should still **speak up** – even if it's just to ask a question. Speaking up is how we drive integrity, together.

Additional Resources

[Non-Compliance Report \(for non-Envirex Group employess\)](#)

[Notice of critical conditions procedure](#)

[Deviation Management procedure](#)

How to Report

You can raise questions or report your concerns in many ways:

- To your manager or to another manager at your location
- To your HR representative or Safety representative
- To the Legal function
- To the Ethics & Compliance function
- Through [avvik.com](#) by creating a Function-related report
- By submitting a report through Non-Compliance Report (for non-Envirex Group employees)

Choose the reporting option you are most comfortable with – whichever option you choose, your confidentiality will remain a priority. We only disclose information about your report if necessary to conduct and conclude the investigation.

What Happens When You Report?

Sometimes you might feel hesitant to report a concern. But if you don't report it, it cannot be addressed. And in certain cases where you are aware of misconduct, the failure to report may result in disciplinary action. We will always support you to do the right thing – and will not tolerate retaliation against anyone for speaking up in good faith.

Envirex Group takes all concerns seriously and has established a thorough and independent investigation process. All Envirex Group employees must cooperate with and provide relevant information when requested. The more detail you provide, the easier it will be to assess the problem, act, and find a solution.

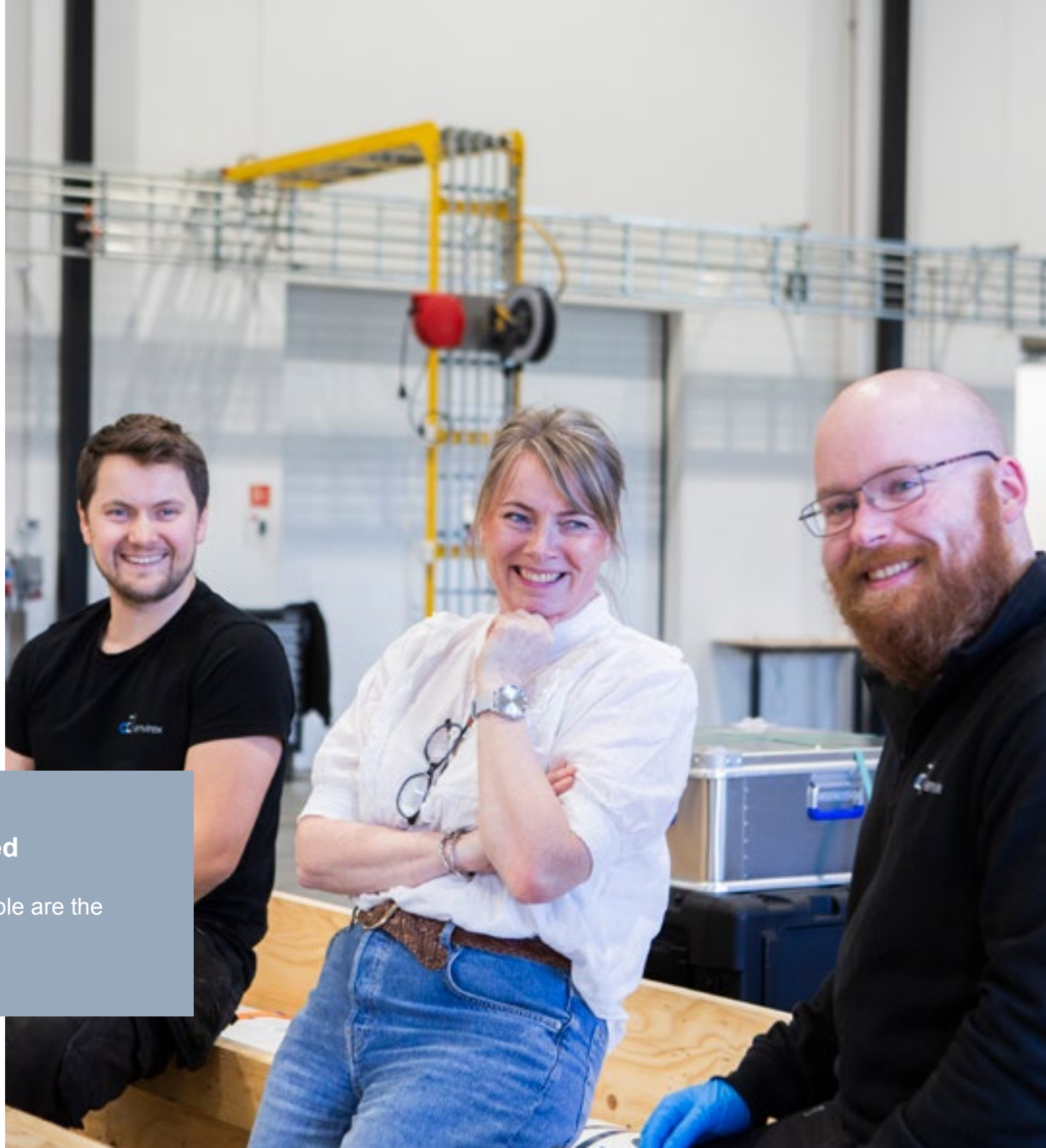
Speak Up!



WE VALUE PEOPLE

We Empower Everyone to Succeed

Because our exceptional and diverse people are the pulse and spirit of who we are.



WORKING THE SAFE WAY EVERY DAY

NOTHING IS MORE IMPORTANT THAN THE HEALTH AND SAFETY OF OUR PEOPLE AND OTHERS AFFECTED BY OUR ACTIVITIES. WE BELIEVE THAT EVERYONE HAS THE RIGHT TO GO HOME EVERY DAY TO THEIR FAMILY SAFE AND HEALTHY. IF ANYTHING – A JOB, PROCEDURE, PROJECT, TRAVEL – CANNOT BE DONE SAFELY AND SECURELY, WE WILL NOT DO IT.



Additional Resources

[HSE - SharePoint](#)

[Quality, Health, Safety, and Environmental \(QHSE\) Policy](#)

WE DELIVER ON THIS PROMISE THROUGH FIVE KEY PRINCIPLES:

We Do Not Compromise

We do not compromise our Health, Safety, and Environment (HSE) principles for performance. We demonstrate visible leadership in the safety and care we have for one another, the environment, our assets, and the communities where we live and work.

We Support Employees

Our vision is to have the healthiest and happiest employees in our industry. We aim for our employees and their families to be healthy and feel empowered in and out of the workplace. We focus on preventive care that includes mental health and emotional wellbeing.

We Plan Ahead

We embed health and wellbeing, safety, security, and environmental considerations in business planning and decision making.

We Speak Up and Stop the Job

Each of us has the authority and responsibility to stop, or not start, any work activity if hazards or risks pose a threat to health, safety, or the environment. When an issue is raised, we listen and respond.

We Continuously Improve

We will set, measure, and review our HSE objectives and targets to drive continuous improvement, and be transparent and open in reporting our HSE performance. This is how we earn the trust and respect of our customers and stakeholders.

To learn more about our HSE principle, please visit our HSE SharePoint site (internal only)

Integrity in Action

You are expected to **stop the job** and **speak up** if you believe it is unsafe to proceed.

RESPECTING ONE ANOTHER AND OUR DIFFERENCES

Respect in the workplace is not optional - it is the key to our success. The diversity of our people is essential to the unique culture of Envirex Group, propelling our success, uniting us, and differentiating us from other companies. Our long-standing commitment to diversity fosters a perspective that is global in outlook yet local in practice. And we recognize that by respecting and promoting diversity, we can better serve the global community in which we operate.

We recognize that different backgrounds, perspectives, and experiences are the foundation of innovative solutions that benefit our company and communities sustainably. Our goal is to create a diverse, inclusive culture that respects the differences among our people and values their identity – a culture where we can work flexibly to thrive both personally and professionally.

Additional Resources

[Employment Practices Policy](#)

[Personnel Handbook](#)

[Personnel Policy](#)



Integrity in Action

Be mindful of our own unconscious biases and be intentional to create an environment that encourages diverse perspectives and open dialogue.

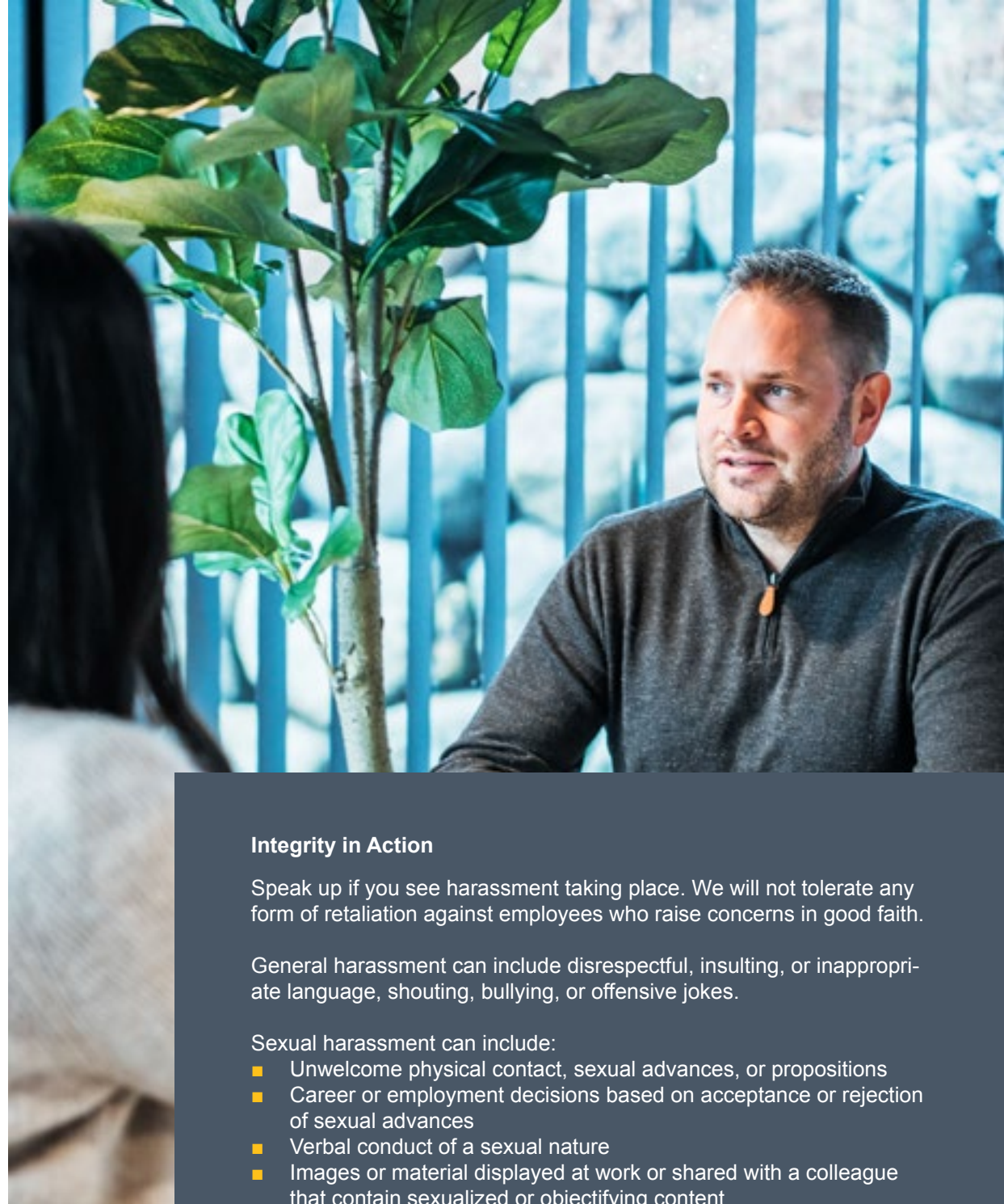
PROTECTING AGAINST HARASSMENT AND DISCRIMINATION

Envirex Group does not tolerate discrimination of any kind and we forbid any form of harassing behavior among our employees, or by or against any of our customers, or other third parties with whom we engage. Acts of sexual harassment, threats of violence, and aggressive conduct are all prohibited. Especially for managers, bullying and intimidation are never acceptable.

Envirex Group prohibits all forms of discrimination, including discrimination in employment, employment-related decisions, and business dealings. Discrimination includes any prejudicial treatment due to an individual's race, color, ancestry, age, sex, sexual orientation, gender identity or expression, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy, or any other representation category that may be recognized locally.

Additional Resources

[Sexual Harassment Policy](#)



Integrity in Action

Speak up if you see harassment taking place. We will not tolerate any form of retaliation against employees who raise concerns in good faith.

General harassment can include disrespectful, insulting, or inappropriate language, shouting, bullying, or offensive jokes.

Sexual harassment can include:

- Unwelcome physical contact, sexual advances, or propositions
- Career or employment decisions based on acceptance or rejection of sexual advances
- Verbal conduct of a sexual nature
- Images or material displayed at work or shared with a colleague that contain sexualized or objectifying content

RESPECTING HUMAN RIGHTS AND TREATING THE COMMUNITIES WE WORK WITH FAIRLY

We conduct business in a manner that preserves and respects human dignity, and we demand the same from all our employees, contractors, suppliers, agents, and business partners. We prohibit any use or contracting, directly or indirectly, of slavery, human trafficking, child labor, and any form of forced labor.

We respect the rights of local communities and work with all our stakeholders to create shared values – aligning our roles and responsibilities to uphold and promote human rights.

Our focus is on creating in-country value and promoting sustainable development. We are committed to working with our local communities and stakeholders to:

- Identify, prevent, mitigate, and resolve social risks and impacts
- Optimize employment and contracting opportunities for local communities
- Ensure that community concerns are taken seriously
- Adhere to all labor, employment, and immigration laws in countries in which we operate
- Promote freedom of association
- Provide access to effective remedies when our activities may contribute to adverse human rights impacts

Envirex Group maintains political neutrality - we do not lobby, and we do not offer financial support to politicians or campaigns. This allows us to be more effective at working with our local communities and stakeholders.

Additional Resources

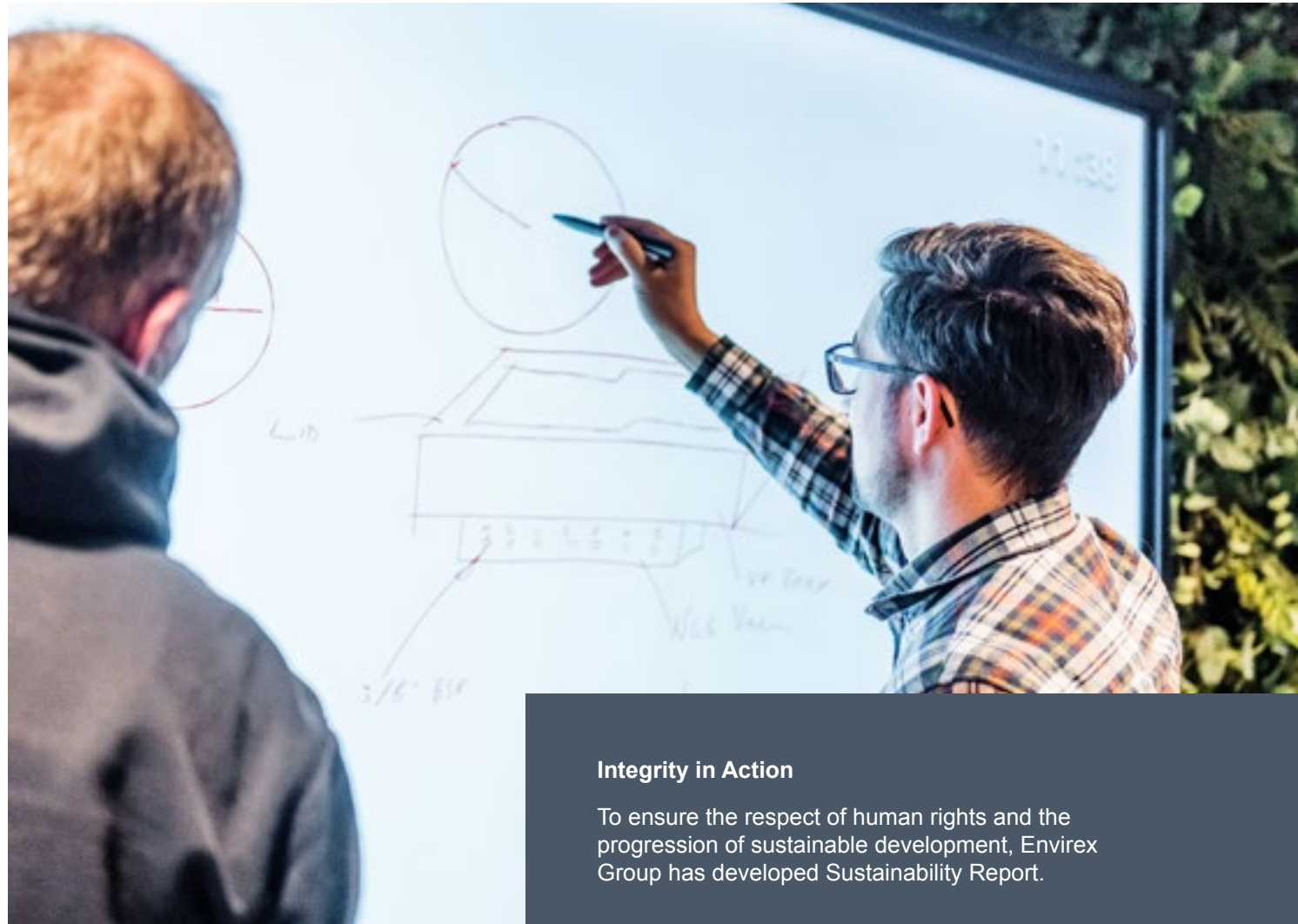
[Human Rights Statement](#)

[Immigration Compliance Policy](#)



PROMOTING SUSTAINABILITY AND PROTECTING OUR ENVIRONMENT

We are committed to operating in a sustainable way to better serve all our stakeholders for the long term. This includes our commitments to carbon neutrality and building a robust program focused on protecting the future of our planet.



Additional Resources

Internal Sustainability Report available upon request

Integrity in Action

To ensure the respect of human rights and the progression of sustainable development, Envirex Group has developed Sustainability Report.

PROTECTING DATA PRIVACY

Personal data privacy and protection is a foundational element of treating our employees and other data subjects with respect.

We protect the privacy of personal data entrusted to us in compliance with applicable data privacy laws.

- We collect and use personal data only as needed for lawful business purposes and keep it only as long as necessary for that purpose
- We are transparent about our collection and use of personal data as explained in privacy notices such as the Envirex Group Privacy Guidelines, Envirex Group Privacy Notice for personnel, and privacy notices provided at the point of collection
- We share personal data with service providers as part of our business operations only if there is a lawful basis to do so and if they contractually commit to protecting the personal data
- We apply appropriate safeguards when we transfer personal data from one jurisdiction to another

To learn more about data privacy and how you can help protect our personal information, please visit our Security site on SharePoint.

Additional Resources

[Security \(SharePoint site\)](#)

[Data Privacy and Protection Policy](#)

[Privacy Guidelines](#)

[Privacy notice for personnel](#)



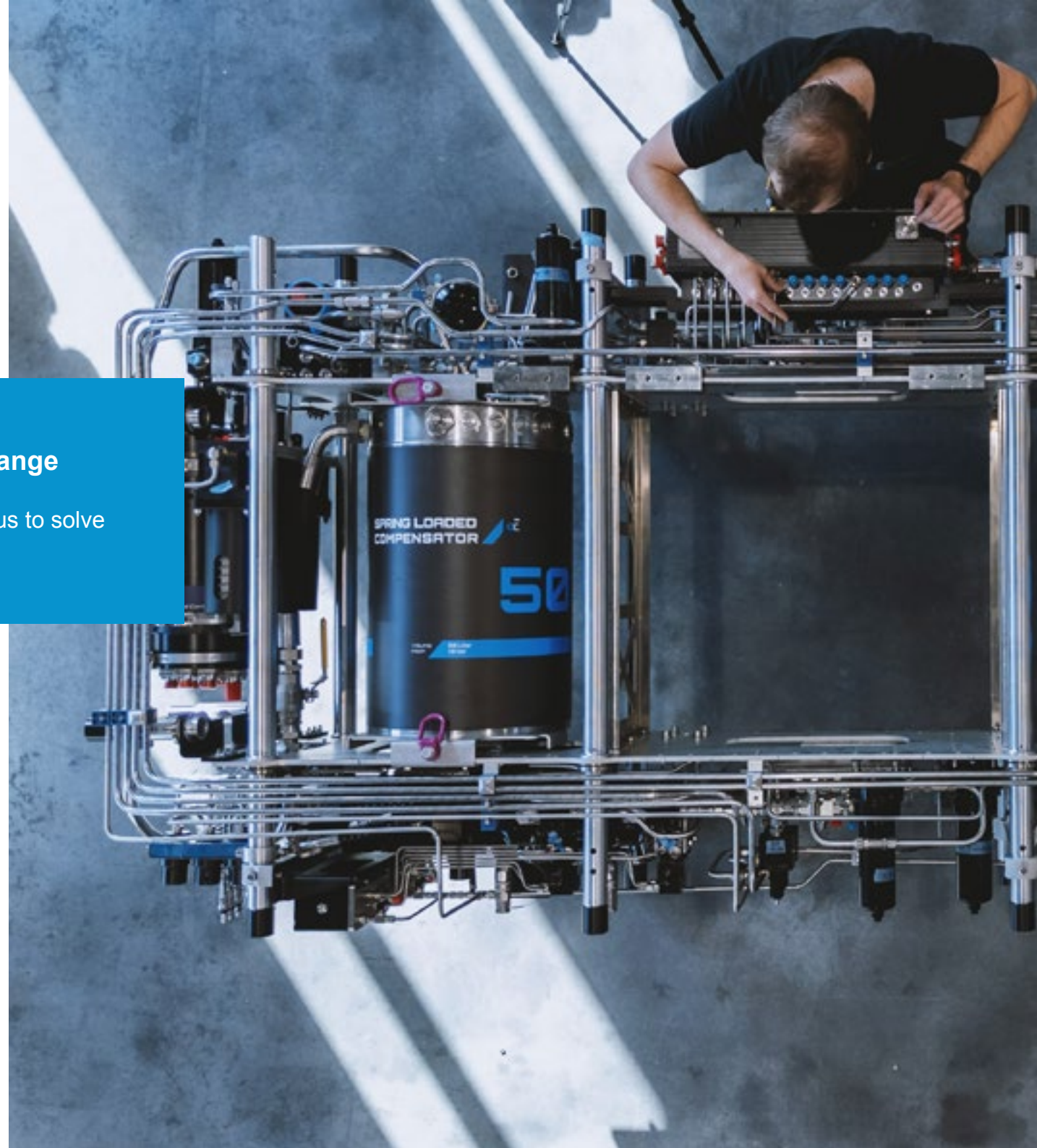
Integrity in Action

- To help us protect personal information, you must always:
- Protect all personal data in accordance with Envirex Group's Data Privacy and Protection Policy
 - Never share unprotected documents containing personal data of employees
 - Immediately report any suspected accidental exposure or unauthorized access to personal data

WE VALUE TECHNOLOGY

We Create Solutions That Drive Change

Because our passion for exploring enables us to solve the world's energy challenges.





We invest for the long term and learn from experimenting in the short term. Our technology sets us apart and helps us disrupt the energy industry.

PROTECTING ENVIREX GROUP'S INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Envirex Group's confidential information and intellectual property are important assets. They represent our collective hard work, innovation, and competitive advantage. We also respect and protect the intellectual property and confidential information of our business partners and collaborators.

We should treat all Envirex Group information, including business plans, strategy, sales data, software code, technical developments, and intellectual property as confidential until publicly disclosed.

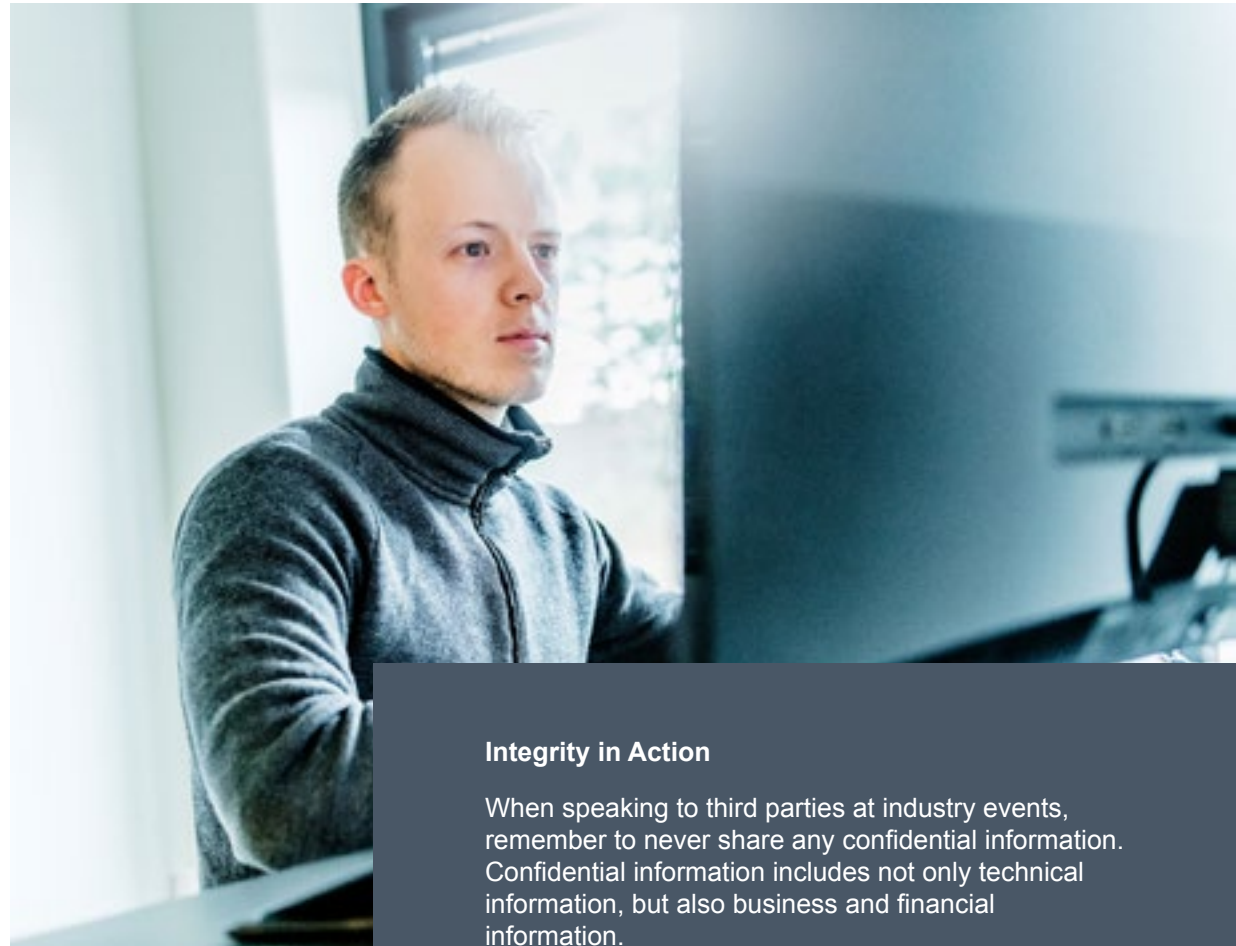
To protect our innovations, we must:

- Avoid disclosure of confidential information to anyone outside Envirex Group until an appropriate confidentiality agreement is in place
- Disclose innovative ideas to our Intellectual Property department before sharing them externally so we can decide how best to protect our rights
- Prevent sharing strategies or other business information (including pricing information or targeted bids) with competitors or other third parties

Additional Resources

[Intellectual Property Policy](#)

[Non-Disclosure Agreement Policy](#)



Integrity in Action

When speaking to third parties at industry events, remember to never share any confidential information. Confidential information includes not only technical information, but also business and financial information.

SECURING OUR DATA AND DIGITAL PERFORMANCE

Data drives our digital performance, and we all have a role to play in protecting against cyber threats. If you become aware of a cyber incident or similar theft, misappropriation, or misuse of our data, information, or network access, then you must **speak up** immediately. The sooner you report, the faster we can act.

Cyber threats are always evolving – from hacking to phishing to social engineering to business email compromise. **Stay vigilant to potential cyber threats, stay up to date on your awareness training, and implement all best practices, including software and security updates.**

Additional Resources

[IT Security Contingency Plan](#)



RESPECTING TRADE CONTROLS

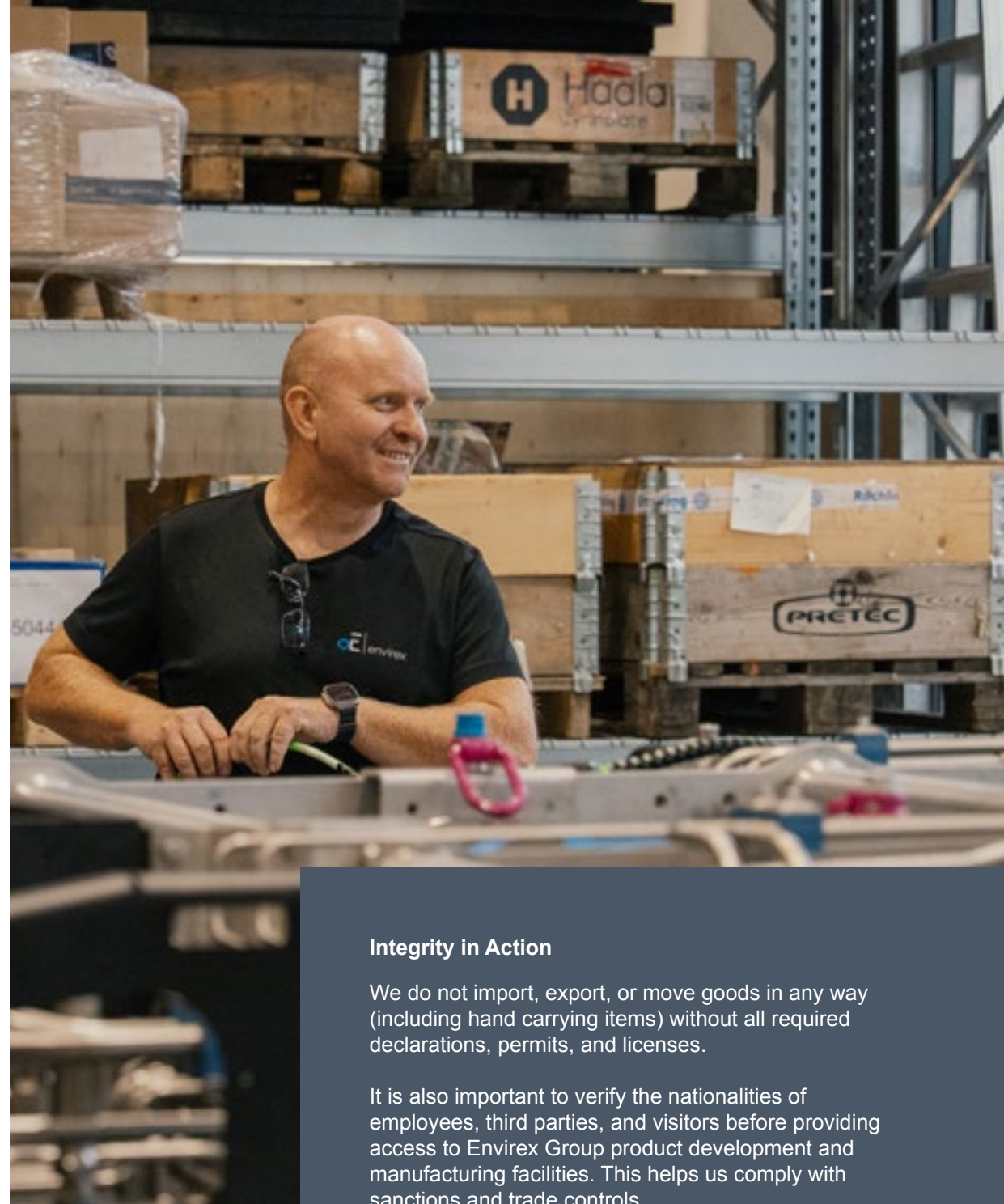
Many countries impose customs taxes or duties on imports, and some countries may impose further limits or restrictions on the types of products that can be exported or imported. Envirex Group is committed to following all relevant international trade control and customs regulations.

For our trade control and logistics teams to arrange the successful movement of goods across our company, you must provide the logistics and trade control teams all accurate information, including:

- Type of products
- Product value
- Intended use
- Intended customer
- Intended destination

Additional Resources

[Trade Compliance Policy](#)



Integrity in Action

We do not import, export, or move goods in any way (including hand carrying items) without all required declarations, permits, and licenses.

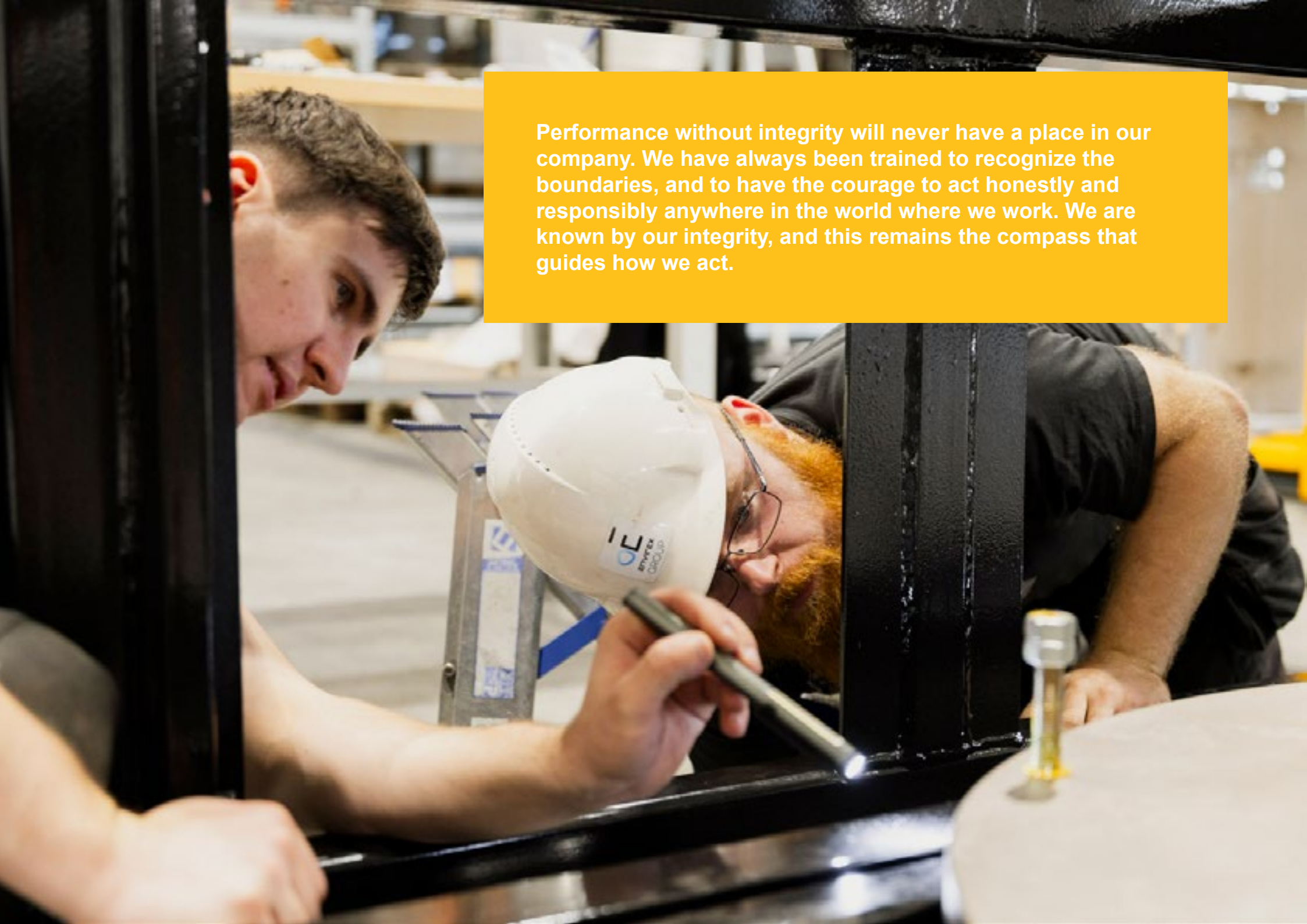
It is also important to verify the nationalities of employees, third parties, and visitors before providing access to Envirex Group product development and manufacturing facilities. This helps us comply with sanctions and trade controls.

WE VALUE PERFORMANCE

We Lead the Energy Industry Forward

Because together we deliver outstanding results to build a sustainable future.



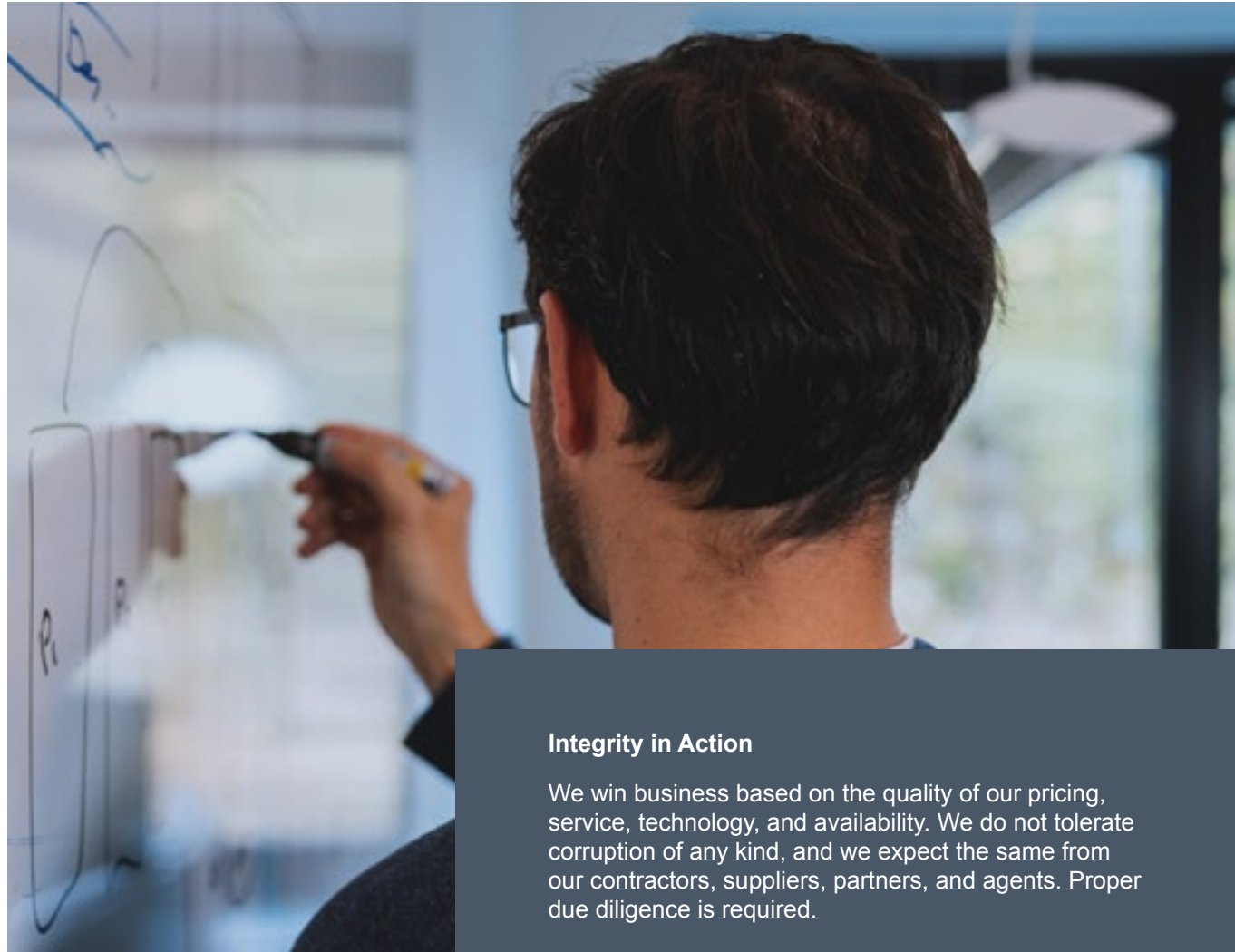


Performance without integrity will never have a place in our company. We have always been trained to recognize the boundaries, and to have the courage to act honestly and responsibly anywhere in the world where we work. We are known by our integrity, and this remains the compass that guides how we act.

PROTECTING ENVIREX GROUP WITH ZERO TOLERANCE FOR CORRUPTION

Envirex Group wins business the right way. **We never offer, promise, give, or accept money or anything of value to or from third parties in exchange for an improper business advantage - and we must ensure the same level of integrity from those acting on our behalf.**

We only work with suppliers, vendors, agents, business partners, and other external third parties that share our commitment to doing business ethically and in compliance with our Code and any applicable laws. **You must ensure all procedures have been followed, all relevant information has been obtained, and all approvals have been secured before any third party is instructed to act on our behalf.**



Additional Resources

[Anticorruption Policy](#)

[FP24 – Compliance with Anticorruption, Business Ethics, Financial Reporting, and Antifraud Requirements](#)

Integrity in Action

We win business based on the quality of our pricing, service, technology, and availability. We do not tolerate corruption of any kind, and we expect the same from our contractors, suppliers, partners, and agents. Proper due diligence is required.

AVOIDING AND DISCLOSING CONFLICTS OF INTEREST

We want all our people to be able to succeed both inside and outside of Envirex Group. But we should never use our positions at Envirex Group for personal gain outside of our employment relationships.

Conflicts of interest can raise questions and undermine trust. **To ensure transparency, and to protect your reputation, any actual or potential conflict of interest must be disclosed to your manager and approved where an actual conflict exists.**

We understand that identifying conflicts of interest can be difficult. When in doubt, reach out to Legal and/or Ethics & Compliance function.



Integrity in Action

Examples of potential conflicts that should be avoided or disclosed could include:

- Taking part in hiring or selection decisions involving a family member or friend as an employee, Envirex Group supplier, or vendor
- Working for, or serving on the board of, an Envirex Group competitor while also working at Envirex Group
- Owning or investing in a company that may compete with Envirex Group, or a vendor that does business (or is going to do business) with Envirex Group
- Promoting the use of a third party owned by friends or family
- Hiring government officials, customers' employees, or their family members to act as third party representatives for Envirex Group
- Exploiting opportunities for ourselves, our friends, or our family members that we discover through our work at Envirex Group or through company property or information.

Additional Resources

[Conflict of Interest Policy](#)

AVOIDING IMPROPER GIFTS AND ENTERTAINMENT

When giving gifts or providing entertainment for people outside our company, we always need to think about how others could perceive our actions. We should never create the appearance of favoritism or a sense of obligation to act in a particular way.

Do not offer any gift or entertainment to any customer or government official, including national oil company (NOC) employees, unless and until you have obtained any approvals required by our Anticorruption Policy and related guidelines. Additionally, always be mindful of our customers' internal policies on gifts and entertainment, which may be more restrictive.

These requirements also apply to donations for corporate social responsibility commitments, dealing with government agencies, working with consultants and agents, and sponsoring or paying for travel.



Additional Resources

[Anticorruption Policy](#)

[Contract Lifecycle Management Policy](#)

[Procurement and Sourcing Policy](#)

Integrity in Action

To avoid even the perception of corruption, gifts and entertainment must:

- Be reasonable, infrequent, and not extravagant
- Have a legitimate business purpose
- Not be cash (or cash equivalent)
- Not be in violation of any applicable law, Envirex Group policy, or customer policy
- Not include adult entertainment or entertainment at prohibited venues

PROMOTING FAIR AND OPEN COMPETITION TO BENEFIT CONSUMERS

We believe that our people, technology, and performance offer clear competitive advantages to our global customer base. That's why we want to win work through fair and open competition – never by colluding, conspiring, or cooperating with competitors or customers in a way that would undermine our credibility or their trust in us.

Examples of prohibited conduct include price fixing, bid rigging, market splitting, or unauthorized use of others' confidential information for unfair advantage. This includes using information from a competitor's bid obtained from a client without the competitor's knowledge.



Additional Resources

[Business Ethics Policy](#)

[Competition Law Policy](#)

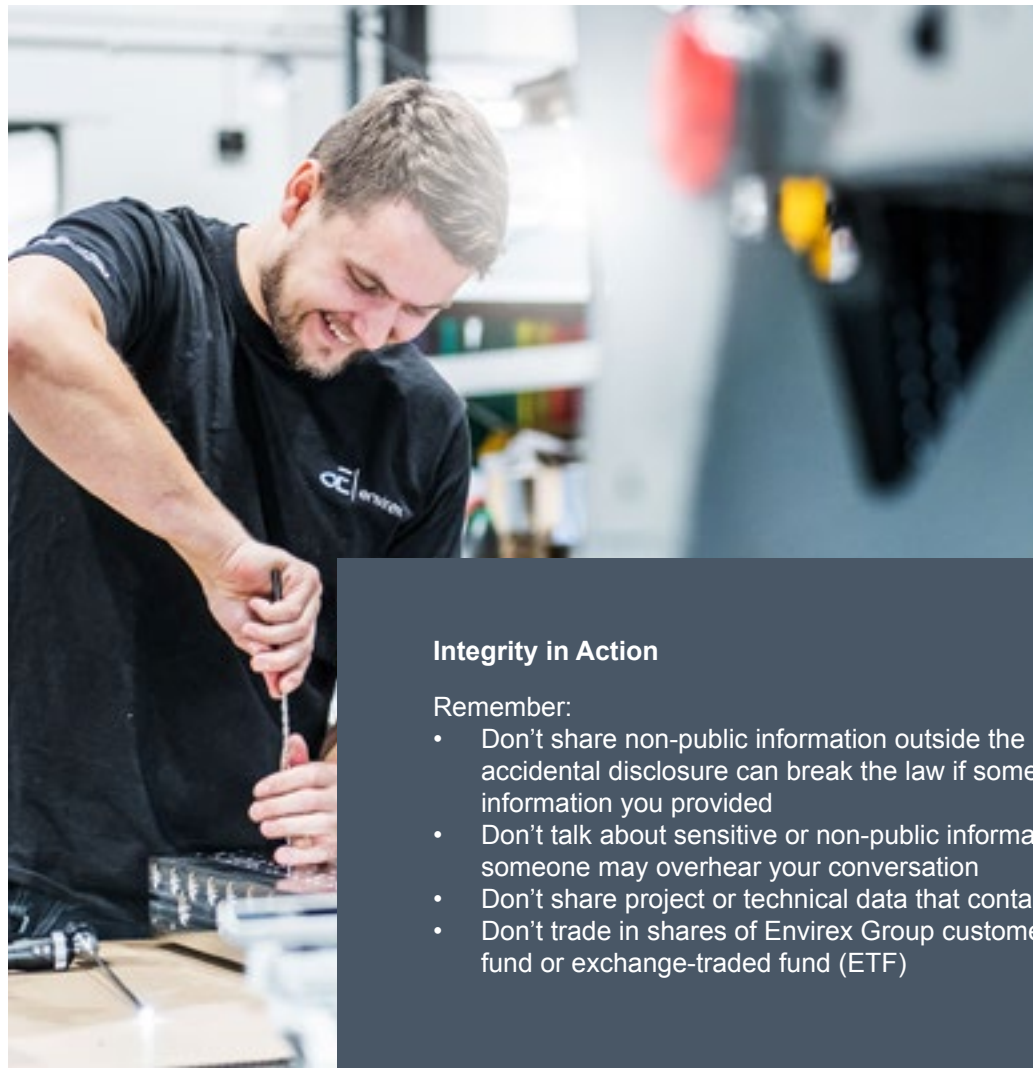
Integrity in Action

Any business engagements with our competitors must be undertaken with caution to ensure that we avoid even the appearance of anti-competitive conduct. If unsure, contact the management or Legal function before sharing or exchanging information with a competitor. Never exchange pricing information or discuss bids.

PROTECTING AGAINST INSIDER TRADING OF ENVIREX GROUP OR CUSTOMER SHARES

While working for Envirex Group, you might come across information that has not been disclosed publicly, such as an upcoming sale or purchase of a business or a potential large contract award. You might also see similar confidential customer information that has not been disclosed publicly. It is possible that this non-public information could impact, for instance, the share price of Envirex Group's customers.

To ensure a level playing field for all investors and to ensure compliance with applicable laws, never make stock trades based on information that is not publicly available to everyone (this is referred to as insider trading).



Integrity in Action

Remember:

- Don't share non-public information outside the company – even an accidental disclosure can break the law if someone trades shares on information you provided
- Don't talk about sensitive or non-public information in public places where someone may overhear your conversation
- Don't share project or technical data that contains non-public information
- Don't trade in shares of Envirex Group customers unless through a mutual fund or exchange-traded fund (ETF)

Additional Resources

[Securities Transactions Policy](#)

MAINTAINING ACCURATE FINANCIAL RECORDS AND EFFECTIVE INTERNAL CONTROLS

Our performance is what allows us to attract and retain customers, employees, and investors. To effectively manage our business and transparently report on our performance to our shareholders and other stakeholders, we must keep accurate and transparent financial and business information. **We do not tolerate falsification or alteration of any Envirex Group documents or other business records.**

We maintain a strong system of internal controls. These accounting and auditing processes ensure that we comply with legal, accounting, tax, and other regulatory requirements, and prevent fraud, in every location in which we operate.

Additional Resources

[Financial Reporting Policy](#)

[FP24 – Compliance with Anticorruption, Business Ethics, Financial Reporting, and Antifraud Requirements.](#)

We all have a responsibility to:

- Ensure that all company assets are properly secured, disbursed, and accounted for
- Keep our records clear, accurate, and complete
- Not falsify any record or account
- Provide truthful and complete information to anyone responsible for financial reporting, forecasts, or business information
- Cooperate fully with any external or internal audit or investigation
- Accurately reflect all inventory or stock on hand, including any items that may have been disposed of
- Properly document the timing in which work is done, goods and payments are received, and revenue is recognized
- Retain records if asked by the Legal department or the Ethics & Compliance team until you are informed retention is no longer necessary



Integrity in Action

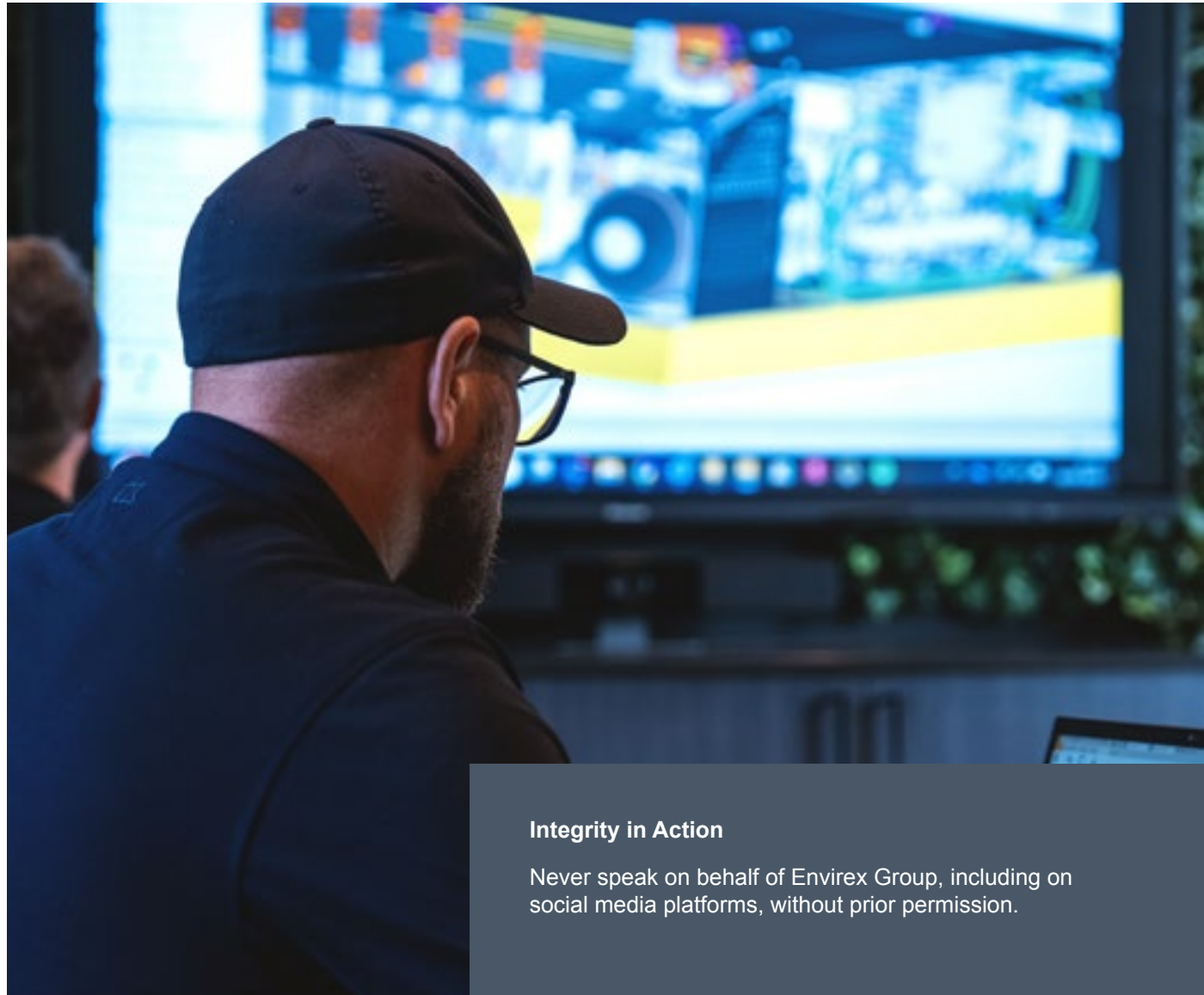
Examples of falsification of documents could include:

- Misrepresenting financial results
- Manipulating or changing test results
- Altering or backdating signed contracts, invoices, or other commercial documents
- Forging signatures
- Misrepresenting country of origin on products
- Creating inaccurate or misleading forecasts, expense reports, inventory counts, or customer invoices
- Misrepresenting pricing or charges to customers.

PROTECTING OUR BRAND

We are proud of our brand and what it represents for us and our goal to achieve a balanced planet. Our brand defines us and embodies who we are, why we exist, and what we do. It inspires confidence in our customers and instills trust within the communities where we work. We must be mindful of what we communicate to ensure it does not reflect negatively on the company's reputation.

To speak with one voice and protect our brand, Envirex Group has designated certain people to speak on behalf of our company. If you intend to post online or publish your views about topics that impact our business, make sure to clarify that your views are your own and that you are not speaking on behalf of Envirex Group. **In any event, never share confidential or customer information in any public space.**



Integrity in Action

Never speak on behalf of Envirex Group, including on social media platforms, without prior permission.



Our employees should expect excellence from themselves, their colleagues, and Envirex Group when it comes to integrity. We should take pride in working for a company where integrity matters.

UPHOLDING INTEGRITY, TOGETHER

Our industry leadership position has been built on working in harmony with our communities and earning the trust of our stakeholders. As we confront a changing world, we will continue to work together to make responsible decisions and execute on our strategy, driving energy innovation for a balanced planet.

Our Code is both the foundation and the catalyst for our collective commitment to integrity, motivating each of us to embrace our individual role in promoting our values and culture as we focus on what matters most.

Holding Ourselves Accountable

If you have violated our Code, policies, or internal requirements, Envirex Group may take disciplinary action, up to and including termination. Similarly, if you are aware of misconduct, and you don't **speak up**, or you intentionally provide misleading information, you may also be subject to disciplinary action.

This Code protects us – and the company – from personal, financial, or criminal liability. By reporting a concern, you are living our values, and **we will never tolerate any form of retaliation** or negative reaction to a concern raised in good faith.



RESOURCES

- [Anticorruption Policy](#)
- [Business Ethics Policy](#)
- [Conflict of Interest Policy](#)
- [Contract Lifecycle Management Policy](#)
- [Competition Law Policy](#)
- [Data Privacy and Protection Policy](#)
- [Deviation Management procedure](#)
- [Employment Practices Policy](#)
- [Financial Reporting Policy](#)
- [FP24 – Compliance with Anticorruption, Business Ethics, Financial Reporting, and Antifraud Requirements](#)
- [HSE - SharePoint](#)
- [Human Rights Statement](#)
- [Intellectual Property Policy](#)
- Internal Sustainability Report available upon request
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- [Privacy Guidelines](#)
- [Privacy notice for personnel](#)
- [Procurement and Sourcing Policy](#)
- [Quality, Health, Safety, and Environmental \(QHSE\) Policy](#)
- [Security \(SharePoint site\)](#)
- [Securities Transactions Policy](#)
- [Sexual Harassment Policy](#)
- [Trade Compliance Policy](#)

For more information, visit envirexgroup.no

