

**Code of Conduct Statement****01.06.2023****ACT WITH INTEGRITY - WORK TOGETHER - CARE – MAKE A DIFFERENCE**

This code of Conduct applies to Torgy Group, its employees, staff and managers and all the Group companies' directors and others that act on behalf of Torgy Group.

Throughout all our business, Torgy Group strives to act responsively and respect and ensure fundamental human rights and decent working conditions.

Torgy employees will conduct its business with integrity, respecting law and cultures as well as the individual's right in all the countries where it operates.

Further, Torgy expects business partners and suppliers to adhere to the same code of conduct.

**Social Responsibility**

Torgy Group recognizes that being a successful and well-respected company is being socially responsible. Its employees are required to act in the best interest of the group and avoid situations that could create conflicts of interest. If a conflict of interest arises, it should immediately be notified to Site directors and CEO.

Employees must not participate in any transactions on behalf of the group where they have a financial or personal interest.

Equal opportunity regardless of race, color, gender, sexual orientation, national origin, religion, political opinions or disability is part of our policy. The workplace shall be free of harassment, and it shall be safe. As part of the safe working environment policy, we will not accept any intoxication of alcohol, drugs or other medicals during working hours, any violation will lead to termination of employment.

Child labor and other violations of human rights such as sexual harassment are unacceptable. Torgy Group shall always follow ruling law and company policies. Site Directors are to ensure that basic salary is above the minimum salary according to local rules. We will not tolerate working conditions that are in conflict with international laws and practices.

## Competition, Bribery and Corruption

Torgy is committed to transparency, and we will not engage in any anti-competitive practices. Our employees must not offer anything of value to obtain an improper advantage in selling goods and services. We will not accept or give gifts or other types of service outside of normal business relations.

For further details, see work instructions, employment agreements and company working rules and regulations.

Torgy expects all its employees/representatives to report any violation of these code of conduct rules to the Site Directors and CEO, and any violation may lead to loss of employment and further actions from authorities depending on the case.

Signature:   
Terje Kjær  
CEO