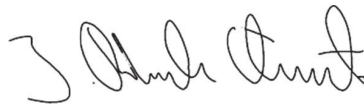


ROHDE NIELSEN

# Code of Conduct

Valid from July 1<sup>st</sup> 2024



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## How to use this Code of Conduct

### Who Should Follow the Code

All Rohde Nielsen employees, whether on shore or at sea, as well as all consultants, subcontractors, suppliers, and business partners, are expected to be aware of and comply with this Code of Conduct. Everyone working with Rohde Nielsen is expected to act in a manner consistent with the principles outlined in this Code.

### Our Employees' Responsibilities

Act in a safe and ethical manner that is consistent with all applicable laws and regulations. Always act in accordance with this Code of Conduct. Speak up if you see any violations of the Code of Conduct - if you see it, you own it.

### Our Leaders' Responsibilities

Lead by example as role models for the company and our way of doing business, guiding employees to follow the Code of Conduct. Inspire and encourage employees to speak up if they see any violations of the Code of Conduct, listening and responding to concerns when they are raised. Ensure that all new employees and subcontractors, suppliers, and business partners working with Rohde Nielsen are aware of the Code of Conduct.

### Our Subcontractors, Suppliers, and Business Partners Responsibilities

Subcontractors, suppliers and business partners working with Rohde Nielsen are expected to follow all applicable laws and regulations, act in a manner consistent with this Code of Conduct and ensure safe and ethical practices in all operations. They should also ensure that their own supply chains comply with these standards. If they any violations of the Code of Conduct, they should speak up.

### Consequences of Violating the Code of Conduct

Violations of the Code of Conduct are a serious matter. By being part of Rohde Nielsen, you agree to uphold the commitments in our Code of Conduct. If you do not do so, you put yourself, your colleagues and Rohde Nielsen at risk.

Failure to abide by this Code of Conduct will be considered misconduct and may result in disciplinary action up to and including summary dismissal and, if appropriate, reporting the offence to the proper authorities. Violations are examined on a case-by-case basis in accordance with Rohde Nielsen policies.

## Our Core Values

At Rohde Nielsen, our work is guided by five fundamental values that shape our company culture and drive our mission.

### Care

Safety and welfare for our employees and external stakeholders are top priorities for us, and we demonstrate this every day. We strive to create a supportive and safe environment that fosters personal and professional growth. Our commitment to care ensures that we act with empathy and responsibility in all our interactions.

### Integrity

We complete projects successfully and efficiently with high quality, on time, and within budget, to the benefit of all parties involved. Honesty and transparency are at the heart of everything we do. We conduct our business with integrity, upholding ethical standards and fostering trust with our stakeholders. Our integrity-driven culture encourages open communication and accountability.

### Diligence

We believe in the power of hard work and attention to detail. Our diligent approach to every task and project ensures that we consistently deliver high-quality results. We hold ourselves to the highest standards, continuously seeking ways to improve and excel in our field.

### Sustainability

We embed sustainability into every aspect of our company's strategy, values, and daily work. Recognising our responsibility to the environment and future generations, we focus on minimising our ecological impact and promoting sustainable practices. We strive to operate in a way that ensures the long-term preservation and protection of our planet.

### Innovation

By actively pursuing the latest technological advancements, particularly in our key areas, we maintain a leading position in our industry. Our focus on innovation encourages us to explore and integrate new technologies and methodologies, ensuring we offer our clients and partners the most cutting-edge solutions available.

## Safeguarding Tomorrow

### Health and Safety

At Rohde Nielsen, our unwavering commitment to health and safety is paramount. We commit to providing a safe, healthy, and secure workplace every single day. This commitment extends beyond legal and contractual requirements; we integrate health, safety, and security risk management into our daily operations and decision-making processes.

We prioritise the wellbeing of our employees through rigorous practical training and comprehensive safety information dissemination. Everyone at Rohde Nielsen is responsible for identifying, understanding, and mitigating unacceptable risks that impact the health, safety, and security of our workforce. When risks cannot be eliminated, we mitigate them to acceptable levels.

Safety and security are critical factors in evaluating and selecting subcontractors, suppliers, and business partners. We ensure that these standards are upheld and promote safety and security awareness among all stakeholders. Our objective is to minimise injuries and maintain a safe, healthy work environment across all our units and sites. Through continuous risk assessments and strict adherence to established safety protocols, we uphold our high safety standards and foster a secure workplace.

### Protecting the Environment

Rohde Nielsen is dedicated to environmental management, with a strong focus on preserving the ocean and its maritime ecosystems. We strive to work with nature, utilising the latest technology to minimise our environmental impact when possible. Our operations are fully compliant with applicable national and international environmental laws and regulations. We actively seek innovative solutions to improve our environmental practices and reduce our ecological footprint. Environmental responsibility is integral to our mission, and we expect all external stakeholders, including suppliers, subcontractors, and business partners, to adhere to these high standards.

## Our people

### Diversity, Equity and Inclusion

At Rohde Nielsen, we value the positive impact of gender diversity in our workforce. A gender-balanced workplace fosters innovation and creates a more dynamic and creative environment. The company essentially aims to have an employee composition that reflects the composition of the general population. We also believe that gender composition amongst our employees creates valuable synergies and should therefore strive reflect the rest of society.

We also recognise the importance of age diversity. The diverse age structure allows us to benefit from tradition, mentoring, and continuity, while also welcoming new energy and ideas from younger employees. This balance ensures a smooth transition as employees retire and new talent enters the industry, supporting our growth and innovation.

Likewise, we believe cultural diversity is essential for tapping into international markets and staying relevant in local regions. Embracing and celebrating cultural differences allows us to understand local customs, preferences, and behaviours, informing our business practices and decision-making. This connection with our customers and partners fosters greater creativity and innovation within our teams. We see cultural diversity as a key driver of our success and an integral part of our identity and values. Thus, we expect employees to participate actively in fostering a diverse and inclusive workplace.

### Promoting Equal Opportunities

We are dedicated to promoting equal opportunities for all employees. We evaluate all employees and stakeholders based solely on their skills and abilities, with zero tolerance for discrimination. Our employment policies ensure the selection of the most qualified individuals, regardless of nationality, ethnicity, gender, age, race, sexual orientation, religion, or disabilities. By championing equal opportunities, we aim to create a vibrant and thriving workplace for everyone.

### Labor Working Conditions and Relations

We are committed to ensuring fair labour working conditions and fostering positive labour relations. We provide competitive wages, benefits, and reasonable working hours. We prioritise open, two-way communication regarding working conditions to ensure employee satisfaction and well-being. We also maintain structured relations with employee representatives and trade unions, promoting a collaborative and respectful workplace. These practices reflect our dedication to fair treatment, transparency, and the well-being of all our employees.

We focus on providing a healthy work environment free from harassment, bullying, and discrimination. (Harassment & Workplace Bullying policy (13-02-2024): Workplace harassment involves repeated, unwelcome behaviour, excluding sexual harassment, from an employer, coworker, or group of coworkers that is offensive, intimidating, humiliating, or threatening. This includes any behaviour that a reasonable person would find unacceptable.

Bullying consists of repeated, unreasonable actions directed at an employee or group of employees that pose a risk to health and safety. Even single incidents can be harmful. Managers must ensure that employees are not subjected to bullying or harassment. Such behaviour can lead to the loss of talented employees, reduced productivity and morale, and legal issues.

All reports of harassment or bullying will be taken seriously and investigated promptly, confidentially, and impartially. Employees are encouraged to report any form of harassment or bullying. Managers must ensure that employees who report these issues, as well as anyone involved, are not victimised. Disciplinary action will be taken against those who bully or harass others, ranging from warnings to dismissal, depending on the circumstances.

**Discrimination:** We strictly prohibit discrimination based on gender, ethnicity, religion, sexual orientation, age, disability, or political beliefs. Every employee is entitled to a workplace where they are treated with respect and equality. Any form of discrimination undermines our values and will not be tolerated.

**Commitment to Action:** We are dedicated to maintaining a workplace where everyone feels safe and valued. Reports of harassment, bullying, or discrimination will be addressed promptly, ensuring confidentiality and impartiality. Disciplinary actions, including warnings, transfers, counselling, demotion, or dismissal, will be taken against those who violate these principles. Workplace bullying, harassment, and discrimination will not be tolerated at any time.

### Human Rights

We prioritise the protection of human rights within our organisation and among our external partners. We have a zero-tolerance policy towards child labour and forced labour, ensuring all our employees work under proper conditions that comply with relevant laws and regulations.

We expect our subcontractors, suppliers, and all other external stakeholders to uphold these same standards. If we find that a business partner fails to meet our or international human rights standards, we will promptly terminate our cooperation with them.

### Employee Development

At Rohde Nielsen, attracting, maintaining, and developing highly trained and qualified employees is crucial to our success. We invest significantly in enhancing employee competencies to ensure the highest quality of solutions and service.

Employees, both at sea and onshore, receive continuous training to the highest international standards through a mix of internal and external programs. We recognise hard work and offer funded education for dedicated and talented staff.

By fostering employee engagement and providing a workplace that supports personal and professional growth, we strive to maintain an inspiring, positive environment and a healthy work-life balance. This ensures our employees are well-equipped to excel in their roles. Strong cross-functional communication and workflows promote essential knowledge sharing, benefiting both the company and its employees.

### Protection of Personal data

At Rohde Nielsen, we prioritise the privacy of our employees and the individuals we interact with. We collect personal information only when it is necessary for our legitimate business operations or to comply with legal requirements. All personal information we gather is handled with the utmost respect and confidentiality, adhering to all relevant legal standards.

We are committed to maintaining the highest levels of data protection. Our processes ensure that any personal information is securely stored, accessed only by authorised personnel, and used solely for the intended purposes. We regularly review and update our data protection practices complying with evolving legal requirements and to uphold our commitment to privacy. By respecting and protecting personal information, we build trust with our employees and partners, reinforcing our dedication to ethical and responsible business practices.

## Our Interactions with Third Parties

### Anti-bribery and Corruption policy

At Rohde Nielsen, we maintain a zero-tolerance policy towards bribery and corruption. Conducting business ethically and with the highest integrity is crucial in all our operations and processes. We strictly comply with all applicable laws and regulations related to these matters.

Offering or accepting money or any other valuable items to gain an improper advantage is strictly prohibited, including facilitation payments. We require all external stakeholders working with or on behalf of Rohde Nielsen to adhere to the same stringent anti-corruption and bribery standards. If necessary, we conduct third-party assessments to ensure compliance.

We have developed comprehensive guidelines for ethical behaviour, with our management placing significant emphasis on this issue. Any challenges related to these guidelines must be reported to senior management.



### Integrity policy

At Rohde Nielsen, we strictly prohibit any form of corruption, bribery, collusion, fraud, money laundering, conflicts of interest, anti-competitive behaviour, extortion, or embezzlement. This applies to all employees, partners, suppliers, consultants, subcontractors, agents, and any other associates. We do not offer or accept benefits or other means to gain undue or improper advantages. Prohibited benefits include cash, gifts, pleasure trips, donations, or any other unmerited amenities.

We reimburse work-related expenses only if they are justified, reasonable, accompanied by proper invoices/receipts, and subject to review by our financial department, senior management, and tax authorities. Social events with clients or partners must primarily focus on professional content directly related to work. Any social extensions such as dinners or activities should not constitute the entirety of these events.

Rohde Nielsen complies with all applicable laws, rules, and regulations in every country where we operate, including Danish transparency and anti-corruption regulations, which are among the strictest globally. We do not source products or services involving child labour, forced labour, modern slavery, human trafficking, illegal operations, or conflict resources. If anyone suspects these policies are being compromised by employees or external parties, they must contact senior management immediately.

### Conflict of Interest

We ensure that personal interests do not influence our employees' judgment or decision-making. While we respect the right to private lives, we expect our employees, secondees, and consultants to avoid situations that may conflict with our company's interests. If such situations are unavoidable, they must inform us promptly.

This includes employment at, partial ownership of, or personal relationships with actual or potential suppliers, clients, or competitors. Any potential or actual conflict of interest must be immediately reported to Rohde Nielsen.