

PROVIDING THE SOLUTIONS

Process Equipment for the
Norwegian Continental Shelf



Code of Conduct

Ethical Rules and Guideline
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1. Our Values

C.R.A.F.T.

Confident – Respectful – Accountable – Friendly – Thorough

Tech Trade’s goal is to help our customers finding the most reliable Process Equipment Solutions and solutions. We do this for our reputation and to create a sustainable safe workplace and business for the future. We do this by having collaboration with our customers and suppliers with innovative, high quality and reliable products on the market.

Our skilled team of knowledgeable and competent engineers offer support to our customers in Conceptual Design, Engineering Support and Product Selection

EXPERIENCE - QUALITY - TRUST

2. Understanding the Code

2.1 Purpose

This Code of Conduct is our public commitment to conduct our business with integrity. The Code aims to build trust and demonstrate our commitment to being a respected and trusted business. The Code of Conduct is our main governance tool and is intended to be a resource to help Tech Trades Representatives to act in accordance with Tech Trade’s core values. It includes references to relevant policies, processes and procedures and other useful resources and tools, which provide additional, more detailed guidance for expected business conduct. Together these form Tech Trade’s governance system. The Code does not cover every possible eventuality, so you, as Tech Trade’s Representatives, must use good judgement and seek further advice when you have any questions or concerns.

2.2 Scope

This Code of Conduct applies to Tech Trade’s directors and employees, as well as those acting for or on behalf of Tech Trade, including hired-in personnel, consultants, business partners/suppliers and sub-contractors. The Code gives guidance and support needed to conduct our business in an ethical manner and in compliance with applicable laws, rules and regulations, as well as internationally accepted guidelines, conventions or similar relating to corruption, money laundering, fraud, slavery, environment, human rights, or similar activities (“Applicable Rules”).

2.3 Responsibility and Implementation

All Tech Trade Representatives agree to uphold Tech Trade's commitment to conduct our business with integrity, by following this Code as well as Applicable Rules. A failure to do so will be considered misconduct, which could result in disciplinary actions being taken – including termination of employment – and the case may be reported to the authorities. The owner and approver of the Code is the Managing Director of Tech Trade.

The HSEQ Coordinator is the functional owner and is responsible for the maintenance, communication and monitoring of the Code, including implementing changes in Applicable Rules. The Managing Director of Tech Trade is ultimately responsible for the implementation of the Code and for the monitoring of its operational effectiveness. The Managing Director of Tech Trade must approve all deviations from this Code of Conduct.

2.4 Declaration of Compliance

As a Tech Trade employee (including temporary personnel) and/or director, you will be requested to read and familiarized yourself with this Code, and that you will conduct your tasks and responsibilities in accordance with the requirements set forth in this Code. All employees will receive induction training, and all training will be recorded in our IMS system.

Suppliers, subcontractors, representatives, and other contracting parties of Tech Trade are expected to have ethical standards that are compatible with this Code of Conduct and shall also sign declarations confirming compliance with the requirements reflected in this Code.

3. People and working environment.

3.1 Human Rights

Tech Trade commitments to respect fundamental human rights and decent working conditions are set forth in our Human Rights Policy and are further reiterated in our Company Social Responsibility Policy and Code of Conduct.

Tech Trade aims to conduct its business in a manner which respects the human rights and dignity of people.

When tendering for goods and services, we review any associated human rights issues/risks and consider how we can ensure that our operations do not come into conflict with any of these fundamental human rights principles.

Freedom of association and collective bargaining

We respect the freedom of association and right to collective bargaining.

Child labour and modern slavery

We oppose any forms of child labour, human trafficking, modern slavery, compulsory or forced labour.

Freedom of opinion and expression

We respect employees' rights to freedom of opinion and expression, freedom of thought, conscience, and religion.

Fair working conditions

We provide fair working conditions to our employees, in accordance with all applicable legislation.

Fairness, respect, and dignity

We treat everyone who works for Tech Trade with fairness, respect, and dignity.

Minority groups

We pay special attention to the rights, requirements, values and integrity of individuals and groups which may be particularly vulnerable to adverse impacts.

Local communities

We respect the human rights of people who work in communities that may be affected by our operations.

3.2 Diversity and equal opportunities.

Tech Trade A/S is committed to equal employment opportunity and will ensure that equal access to jobs, benefits and services is available to all employees and prospective employees.

3.3 Anti-discrimination and harassment.

We are committed to creating a working environment free from any form of discrimination, abuse, harassment, intimidation by or towards our employees or others affected by our operations.

We believe everyone should be treated with respect regardless of their backgrounds.

We are committed to the elimination of discrimination based on gender, race, ethnical background, sexual orientation, age, political beliefs, marital status, or any other status.

3.4 Privacy – Protecting personal information.

Tech Trade respects the privacy of its employees and will only use personal information in accordance with Applicable Rules relating to privacy and to the extent needed to operate effectively. Access to personal information is restricted and will only be accessible when there is a legitimate need by tech Trades Representatives with the required authorisations. Tech Trade is committed to securing the confidentiality of personal information of our employees and everyone we work with. Personal data will only be used for appropriate purposes and processed in accordance with Tech Trade's data protection guidelines.

4. Integrity

4.1 Tech Trade Representatives and Business Partners

Tech Trade's reputation relies on the collective behaviour of Tech Trade's Representatives and our Business Partners. Tech Trade expects that everyone who works for, or on behalf of, the company will do so with integrity and in accordance with Applicable Rules, as well as this Code of Conduct.

We seek to collaborate with others who share our commitment to ethics and compliance, and we shall clearly communicate our expectations to our Business Partners. We manage risk through performing due diligence investigations on our Partners and monitor their compliance where necessary.

4.2 Anti-Corruption & Bribery

Tech Trade strongly supports international laws and regulations. We will not accept unethical or fraudulent payments made directly or indirectly to or from a client, official government or third party, including facilitation or corrupt payments, gifts, gratuities, entertainment, favours, contributions, or any other inappropriate transfers. We will only cooperate with stakeholders of these same values.

4.3 Confidentiality

Tech Trade is committed to protecting confidential information. We will not misuse information belonging to ourselves or any of our partners.

4.4 Conflict of Interest

Tech Trade's Representatives shall act impartially in all business matters. A conflict of interest may occur where your personal interests or activities may impact, or appear to impact, your ability to make objective decisions on behalf of Tech Trade. Such interests or activities can include financial interests in other companies or in transactions, personal relationships, including but not limited to immediate family, or any other interests or relationships that could improperly affect our judgement and decision-making. Where you suspect that a situation could create a conflict of interest, or even the appearance of a conflict, you should disclose this to your line manager.

Transparency allows Tech Trade to better address the situation.

4.5 Fair Competition

Tech Trade shall compete in a fair and ethically justifiable manner, and we do not tolerate any violations of Applicable Rules relating to competition. The company is committed to fair and open competition and to not engage in any activities that involve unlawfully obtaining, receiving, using, or sharing non-public competitively or commercially sensitive information. Examples of such information can include prices, existing contracts, competitive bids, commercial strategies, costs, or other types of non-public competitively or commercially sensitive information.

4.6 Compliance to Trade

The distribution of products, including but not limited to Tech Trade hardware, software, documents, source code, technical data or other technology, is governed by national and international laws that can have multiple effects on Tech Trade's operations.

The transfer of goods across borders may be subject to regulations.

Tech Trade is committed to comply with all applicable trade compliance laws and regulations, including export control and compliance with sanctions, that affect our operations. We are committed to accurately and transparently declaring and valuing exports and imports to customs authorities.

5. Safe Operation

5.1 Asses to Information Security

We trust you with Tech Trade's assets so that you can effectively do your work. It is important that we all act in a manner which ensures that Tech Trade's assets are not damaged, misused or lost. Tech Trade's assets include licenses, facilities, property, equipment, computers, IT systems, information, and funds. Tech Trade's assets shall only be used for legitimate business purposes and by authorized personnel. Breaches in our information security systems can damage our business, have significant consequences for our ability to retain a competitive advantage in the market but also constitute a breach of law. All Tech Trade Representatives have a duty to detect and report threats to our information security, to keep Tech Trade's information and systems protected against any unauthorised disclosure or use, and to actively work to prevent unauthorised access or loss thereof. These principles also apply to confidential information which Tech Trade has received from a third party.

5.2 Maintain Accurate and Complete Information and Records

Tech Trade is committed to providing a correct and understandable picture of our business. We communicate relevant business information in full and on a timely basis to employees and stakeholders, as well as Business Partners, government officials, and the public. Both financial and non-financial information shall be recorded completely, accurately, and objectively, and in accordance with Applicable Rules related to accounting and relevant standards.

6. Health, Safety, Security, Environment and Quality (HSSEQ)

Health, Safety, Security, Environment and Quality ("HSSEQ") is always the number one priority in all of Tech Trade's activities. The company strives to ensure that all its operations are carried out under the highest HSSEQ standards. Tech Trade shall be a safe workplace, where the goal is to prevent any kind of harm. Everyone who works for the company – our employees, hired personnel and contractors – shall be able to perform their work in an environment where the emphasis is on safety. Our facilities shall be in good condition, and activities must be planned, designed and maintained in a manner that ensures their integrity.

7. Operation Principles

7.1 Where to seek guidance.

It is important that all Tech Trade Representatives seek guidance in case of uncertainty in respect of compliance with this Code or other Tech Trade policies, processes and procedures. Where the Code does not answer your questions, guidance may be sought from line managers or others from the management,

7.2 Report your concerns.

Any suspicion of unethical conduct, which is in breach of this Code, Tech Trade's policies, processes, procedures and/ or any Applicable Rules, must be reported to your line manager without delay. If your line manager fails to recognise the seriousness of the matter or appears to be involved in the unethical conduct, or if you are unable to speak to your line manager, or a relevant function such as HR, HSSEQ, or a representative from the management, you must report the suspicion to the whistle blower Channel. You may choose to be anonymous.

7.3 Training and monitoring.

All employees are required to participate in mandatory training in the Code of Conduct. All managers in Tech Trade are responsible for leading by example and ensuring compliance with, and implementation of, this Code, Applicable Rules and the policies, processes and procedures set out in Tech Trade's Integrated Management System.