

EFFECTIVE SOLUTIONS

CODE OF CONDUCT

Revision 1
2023 October 1



INTRODUCTION FROM CEO

- Strong company comes from strong values
- Team is our core value
- High safety standards is number one for us
- Working together is way to success
- Communication is the key

Our Code of Conduct defines how all Effective Solutions employees work. We are proud of the ethical business practices that we have established and the values we live by.

Dedicated colleagues who share our strong values make us a great company – and this is essential when it comes to attracting employees and being chosen by customers for their projects. It builds trust among colleagues, partners and customers.

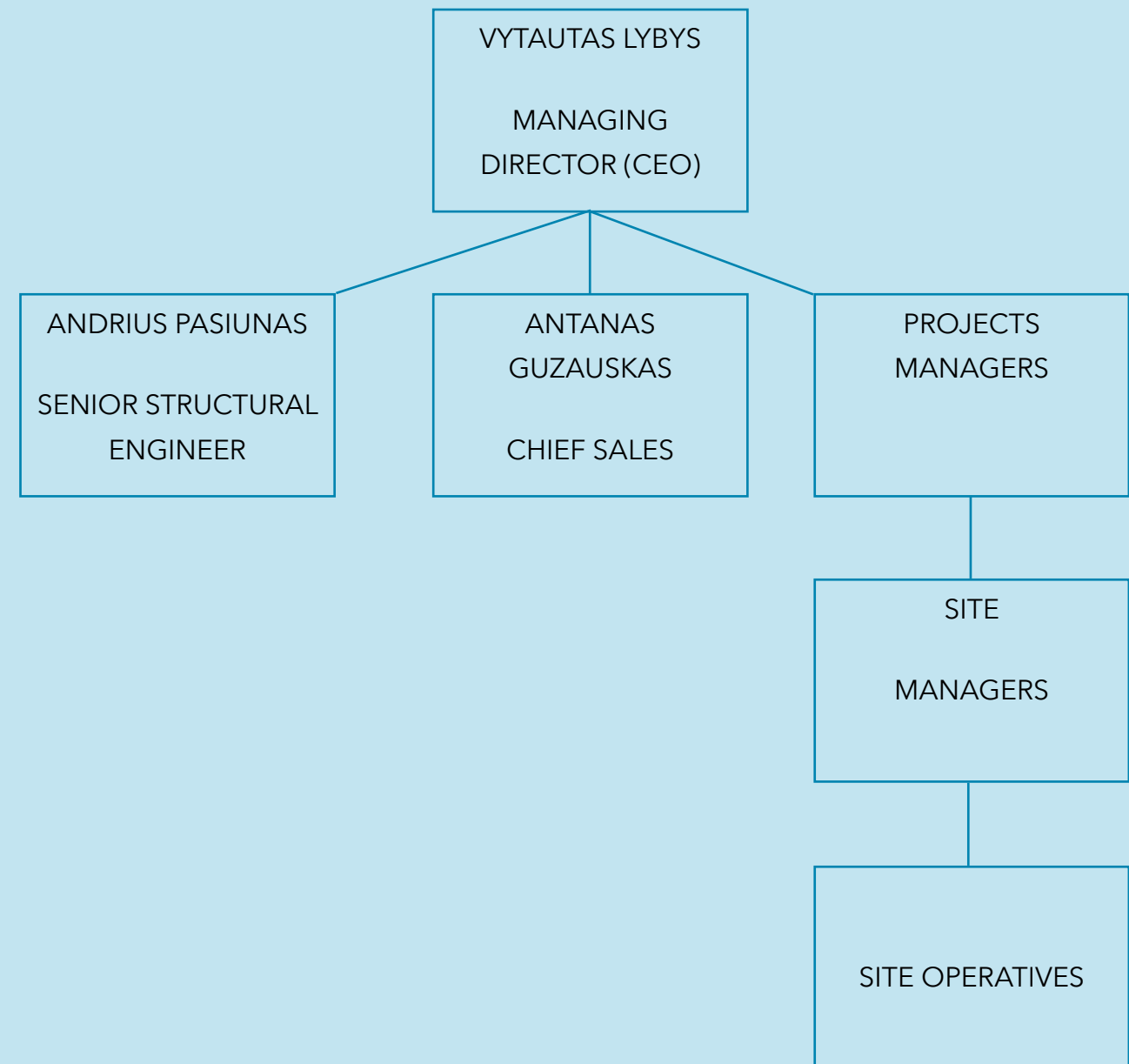
Our business and reputation are strong and we continue to build our culture, as stated in our Code of Conduct. With a industry leading position comes increased responsibility.

However, ethical breaches are a major business risk – in the worst - case scenario we risk being excluded from business. Therefore, we cannot accept unethical behaviour and we will take immediate action against all such behaviour – no compromises.

Our values and the Code of Conduct guide us in doing the right thing – but they don't replace thinking. There will always be grey zones in decision-making and the Code cannot provide the answer to every question, but we constantly continue learning and improving from day to day activities.

Organically, we must also guide each other in the right direction. I expect each and every one of you to live by our values, always have an open dialogue and take part in our ethics training.

OUR COMPANY STRUCTURE



OUR CODE OF CONDUCT

Effective Solutions Code of Conduct is a guide designed to help all our employees to connect with our values and provide expectations for our everyday behaviour. The Code is where we find direction on how to conduct ourselves as Effective Solutions employees when we interact with each other, our customers, the communities in which we operate, and other stakeholders. It is the place to start when we face an ethical dilemma, and it provides information on whom to contact when we have questions or concerns.

Care for Life

We care for life of people and the environment. We care of safe work environment. We never walk by if we notice unsafe actions. We support health and wellbeing. We promote green solutions and conduct our operations in that way. We care for future generations.

Ethical and transparent action

We do business with a high degree of integrity and transparency. We live by our Code of Conduct and never accept shortcuts. We promote working environment where everyone can speak their mind.

Better together

We always strive to be better in all we do. We are a learning organisation and share our expertise, we believe that quality and innovation elevates our professionalism, and brings greater values. Our teams are built of our employees Customers, Partners and Communities where we leverage diversity to deliver the best solutions. We foster an inclusive culture where we are open and fair, showing trust and respect for each other.

Commit to Customers

We help our customers to be successful in their business. We strive to understand their needs and do ell the best to turn their visions into reality.



OUR CODE OF CONDUCT

Human rights and global commitments

Our Code and expected behaviours are based on our values. We support the rights of all people equally as described in the Universal Declaration of Human Rights adopted by the United Nations (UN) and codified in the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic Social and Cultural Rights (ICESCR) and the conventions of the UN's International Labor Organisation.

We take seriously our responsibility to protect and improve the lives of people whether they work closely with us or are only influenced by our operations in an indirect way.

Effective Solutions is committed and support the UN Global Compact, and we adhere to its Ten Principles reflecting human rights, labor, the environment and anti-corruption. We support the UN Framework Convention on Climate Change (Paris Agreement). In addition, we subscribe to World Economic Forum's Partnering Against Corruption Initiative (PACI) principles to prevent corruption, which is not only bad for business but also damaging for communities.



OUR CODE OF CONDUCT

To whom code of conduct applies

All Effective Solutions employees regardless of status or position must adhere to the principles and requirements contained in this Code. This includes part time, contract and temporary employees. If you are a manager or supervisor, you have a particular responsibility to lead by example and act according to the code of conduct.

We give our highest priority to code of conduct. Should you breach our code of conduct or company policies, you will be subject to corrective or disciplinary action, which may include, but is not limited to, termination of your employment.

External parties

This code of conduct extends beyond Effective Solutions, as external people and companies are essential to the work we do. Subcontractors, suppliers, consultants and agents must follow the relevant portions of our code of conduct in their business with us.

Reporting a concern

Effective Solutions's commitment to doing business with a high degree of integrity and transparency depends on a culture in which everyone feels empowered to report instances of non-compliance with our Code, including suspected illegal or unethical conduct (collectively called misconduct). By reporting misconduct, we help to protect our business and our reputation.



OUR CODE OF CONDUCT

COMMITMENT AT WORKPLACE

Working at Effective Solutions is not only about delivering the best solutions and helping our customers to be successful. It is also about managing Effective Solutions's assets responsibly and creating a fair, healthy and safe workplace where we all can develop our professional skills and grow as individuals. You must do your part by conducting yourself professionally, and by helping promote an inclusive culture in which everyone feels welcome.

Health and safety is about preventing accidents and promoting a healthy and safe work environment for our employees and the ones working around us, people working with us and the general public who come into contact with our projects. This is a fundamental priority for Effective Solutions and our goal is clear: an Injury-Free Environment.

Well-being is a feeling of contentment, something often affected by the workplace environment. It includes supportive supervision, having a sense of purpose and a feeling of physical security.

- We care for our people and the people affected by our workplaces.
- We continuously strive to develop a work environment that promotes health, safety and wellbeing.
- We believe that visible leadership is essential for a strong health, safety and well-being program.
- We promote and share sound personal safety and accident prevention practices with our supply chain and through- out our industry.



OUR CODE OF CONDUCT

COMMITMENT AT WORKPLACE



- We provide health and safety training and education relevant to our employees' work situations and environments.
- We ensure that subcontractor employees are adequately trained and provided with the proper equipment to safely carry out their work.
- We aim to lead our industry in health and safety performance, with continuous measurable improvements toward our goal of an Injury-Free Environment.
- Effective Solutions have the right to a secure and safe workplace.
- Our teams take personal responsibility for helping to ensure a healthy and safe work environment.
- Our employees care for the health of your colleagues and report all workplace incidents and any unsafe or unhealthy work conditions to your manager or local safety manager.
- Our employees never walk by any work activity you believe is unsafe or unhealthy. On the contrary, you have the authority and responsibility to stop any activity – including your own – that you believe is not being conducted in a healthy and safe way.
- Regardless of your role, you can contribute to a safe workplace by demonstrating active, courageous and visible leadership in health and safety matters.
- Any safety concerns should be immediately reported to your supervisor or someone in authority on site.

OUR CODE OF CONDUCT

FAIR WORKING CONDITIONS



All employees should be adequately rewarded for their work and should be treated fairly and with respect for their employment rights. We demand these conditions, as set out in the human rights and ILO standards that apply internally but also for our supply chain.

- We do not tolerate any form of child, forced or compulsory labor on our work sites or in our supply chain.
- We do not allow any practice that would restrict free movement of employees.
- We recognise the special needs of employees under the age of 18 and our duty of care towards them.

We only permit working hours, wages and benefits that are in compliance with national and local laws and relevant ILO conventions. We recognise and respect collective bargaining agreements and our employees' right to freedom where permissible by law. We maintain a dialogue with our employees to ensure their rights are respected.

You have the right to be treated with respect and dignity. In turn, you should respect the dignity, privacy and rights of each individual you interact with and those affected by our business operations.

OUR CODE OF CONDUCT

DIVERSITY AND INCLUSION



Diversity is everything that makes us unique as individuals, such as age, gender, sexual orientation, ethnicity, generation, religion, beliefs, language, education and marital status.

Inclusion is when the richness of ideas, unique views, perspectives and opinions of a diverse group are valued and encouraged.

- We respect all individuals and strive to work as one team and to foster open, straightforward and respectful communication.
- We believe that a diverse and inclusive workplace delivers better customer solutions.
- We provide equal treatment and opportunities to everyone, without regard to appearance, ethnicity, national origin, religion or belief, gender, sexual orientation, gender identity or expression, age, disability, marital or family status, or any other characteristics protected by laws and regulations.
- Our policy of equal employment opportunity encompasses all aspects of the employment relationship, including training, promotion and all other terms and conditions of employment.
- We do not accept any form of disrespectful behaviour, bullying, discrimination, harassment, or unwanted sexual advances.

OUR CODE OF CONDUCT

PERSONAL GROWTH AND DEVELOPMENT

Opportunities for personal growth and development help Effective Solutions employees develop their talents and potential, and use their new skills and abilities to further improve our high-performing teams.

- We believe our people are our greatest asset.
- We support our employees in growing and developing both, personally and professionally.
- We offer training and development opportunities to improve our employees' knowledge and skills.
- We encourage our employees to develop and learn through networking and sharing of best practices.
- Employees take responsibility and actively contribute to your own learning and personal development.
- Employees have the right to receive feedback from their manager.



OUR CODE OF CONDUCT

DATA PROTECTION (PRIVACY)

Data protection is about safeguarding your personal integrity when processing personal data about you. Personal data refers to information relating to a living natural person or that can be used to, directly or indirectly, identify the person. It could include someone's birthdate, contact information, family member names, personal healthcare information, photographs or identity number.

- We ensure that all uses of personal data such as collection, registration, comparison, storage and deletion, or a combination of these take place in accordance with applicable laws and regulations.
- We respect everyone's right to the protection of his or her personal data.
- We safeguard the personal information of our employees and other stakeholders.
- We ensure that only persons who need access to personal data in order to perform their job responsibilities have access to such personal data.
- We ensure that all persons who have access to personal data take appropriate precautions to protect it.
- We ensure that personal data is not retained for a longer time period than necessary to achieve the purpose for which it was obtained.
- You always act respectfully and consider the privacy of others. You only access personal data if you are authorised to do so and only to the extent necessary for your job responsibilities.
- If you have permission to access personal data, you protect and keep the information confidential.



OUR CODE OF CONDUCT

CONFIDENTIALITY

Safeguarding our ideas, processes and business information is important for our competitiveness and for maintaining the trust of our stakeholders. For this reason, certain information is protected company property and is considered confidential.

Confidential information includes trade secrets, know-how and proprietary information. It also includes business plans, financial records, customer information, details of projects we are tendering for or executing, pricing information, personnel files and matters, allegations and investigations of reported misconduct, financial and accounting data, and other business affairs and methods.

- We respect confidential information relating to Effective Solutions and our stakeholders.
- For new employees, we do not ask for confidential information of their previous employers.
- We take all reasonable measures to prevent confidential information from being disclosed to any person who does not need and have a right to that information in the course of his or her work.
- You do not access, use, store or share confidential information without the appropriate authorisation.
- You protect confidential information from loss or theft. This includes protecting mobile computing devices, such as laptops and tablets.
- If you receive confidential information by mistake whether it comes from an external party, colleague, customer, competitor, or otherwise you contact and disclose the situation to your manager, and do not act upon the information.



OUR CODE OF CONDUCT

WE AND MARKET



We believe the best business relationships are founded on respect and mutual benefit. This is why we always strive to understand and anticipate the needs of our customers, suppliers, partners and other stakeholders, why we conduct ourselves with integrity, and why we act responsibly and fairly. As Effective Solutions employees, we are expected to do our best when it comes to delivering on quality, on time and on budget. In fact, we always strive to do better than expected.

- We are committed to positive, constructive and long-term business relationships with organisations that have values aligned with our own.
- We strive to anticipate their needs and exceed their expectations by acting in an innovative and proactive manner.
- We strive to make them successful by understanding their business.
- We strive to solve their problems, both simple and complex.
- You act with integrity and fairness in all your dealings with our stakeholders, which you always treat in a professional and respectful manner.
- You ensure that our Code or the Supplier Code is part of our contractual agreements with external parties (refer to the Introduction of this Code for further information regarding joint venture partners).
- You work with external parties to ensure that they understand our ethical standards before entering into any relationships with them.
- You actively listen to our customers and make sure that you understand their needs and expectations.

OUR CODE OF CONDUCT

CONFLICTS OF INTEREST

Conflicts of interest occur when there is a conflict between our personal interests and our responsibilities as employees or representatives of Effective Solutions. Even the appearance of a conflict of interest can be as damaging as an actual conflict.

Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close relationships or other forms of involvement with an entity that competes with or engages in business with Effective Solutions.

Companies provide hospitality to their customers and business partners to promote business. Forms of hospitality may include entertainment, meals, sporting events, accommodation, and travel.

Gifts: A gift is something given voluntarily without anything expected in return. When given appropriately, gifts do not create the impression of improperly influenced business decisions. When inappropriate, hospitality and gifts may create a conflict of interest or the appearance of bribery, and this is not tolerated in Effective Solutions environment.



OUR CODE OF CONDUCT

COMMITMENT TO QUALITY

We are proud delivering quality and innovation, and we understand that delivering high quality work benefits both our Customers and Effective Solutions.

- We aim to deliver quality work in all that we do, with a focus on continuous improvement.
- We work together with our stakeholders to provide products and services that meet or exceed their expectations.
- We acknowledge and seek to resolve defects in our work in accordance with our contractual obligations.
- You seek excellence in every aspect of your work.
- You work with our customers and external parties to understand their expectations and the required levels of quality.
- You report to your manager any suspected defects that have not been addressed in a timely manner.



OUR CODE OF CONDUCT

SOCIETY AND ENVIRONMENT

Our environmental commitment relates to the impact of our operations and processes, including effects on the climate and longterm environmental performance of the products and services we provide.

- We are committed to protecting the environment and believe that we can make major contributions to a more sustainable world.
- We actively work to improve the environmental performance of our operations, projects, products and services during their entire life cycle.
- We consider environmental opportunities and risks selecting supply chain.
- You take the time to understand the environmental risks and impacts associated with your daily work and actively look for opportunities to reduce them. This includes the production of waste and carbon dioxide, as well as the consumption of energy, water, materials and other resources.
- You follow the requirements and procedures for using, storing, labelling, transporting and disposing of chemicals and hazardous materials.



OUR CODE OF CONDUCT

ANTI CORRUPTION AND ANTI BRIBERY

Corruption is the abuse of power, often for private gain. This includes conflicts of interest, embezzlement, bribery, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

Facilitation payment is another example. This is a bribe, often small, paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.

Corruption undermines legitimate business activities, distorts competition, ruins reputations, damages brands and exposes companies and individuals to risk.

Bribery is an attempt to influence someone in the conduct of his or her duties by providing, offering or promising an improper benefit. Bribery can also be accepting, accepting a promise of or demanding an improper benefit. Such a benefit may include a payment in cash or cash equivalent, but could also be anything of value, such as an unpaid internship.

- We are committed to conducting business with a high level of integrity and do not tolerate any form of bribery or corruption.
- We avoid situations that may give the appearance of bribery, corruption or other inappropriate behaviour.
- We do not request, accept, pay, or offer to pay bribes, either directly or through external parties acting on our behalf.
- We do not make facilitation payments and we do not allow external parties acting on our behalf to make them, even when permitted by law.



OUR CODE OF CONDUCT

ANTI CORRUPTION AND ANTI BRIBERY

- You never request, accept, pay, offer or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a public official, including foreign public officials, nor any other individual or entity.
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf.
- You ensure that intermediaries are retained only for legitimate business reasons, fees paid to intermediaries are reasonable in relation to services actually performed, payments to intermediaries are recorded properly and supporting documentation is obtained.
- You do not use charitable contributions or sponsorships.

SANCTIONS - MONEY LAUNDERING

- We do not to engage, directly or indirectly, with any person or entity listed as prohibited on any sanctions list.
- We do not conduct business, directly or indirectly, with any country or region subject to sanctions.
- We only conduct business with reputable customers and business partners involved in legitimate business activities, with funds derived from legitimate resources.
- We notify the relevant authorities of any reasonable suspicions of money laundering, as required under relevant laws.



OUR CODE OF CONDUCT

FAIR COMPETITION

Competition and antitrust laws protect and promote free and fair competition. These laws apply to all of Effective Solutions operating markets and they combat such illegal practices as price fixing, market sharing and bid rigging, as well as other practices with an anti competition intent or effect.

- We believe that fair and open competition is best for our company, our shareholders, our customers, our employees and society at large. Fair competition drives efficiency and innovation, which are the basis of a well-functioning market economy.
- We do not tolerate any violation of antitrust laws, competition laws or related regulations.
- When employees are at higher risk due to their roles and responsibilities, we provide training to help them identify situations in which antitrust and competition law considerations are relevant.
- You have a responsibility to understand how Effective Solutions antitrust and competition (EU) laws relate to your daily work.
- You do not make any arrangements with competitors in order to restrict competition.
- You do not discuss or exchange sensitive commercial information with competitors.
- You consult your Management or Legal Department if you have questions or concerns regarding compliance with antitrust and competition laws.



OUR CODE OF CONDUCT

REFERENCES

Our Code is aligned with the rights below.

Right to life (UDHR Article 3, ICCPR Article 6)

Right to health (ICESCR Article 12)

Right to work (UDHR Article 23, ICESCR Article 6)

Right to enjoy just and favourable conditions of work (UDHR Article 23, Article 24), ICESCR Article 7, ILO Convention 100, Convention 155, Convention 1 and 30

Right not to be subjected to slavery, servitude or forced labour (UDHR Article 4, ICCPR Article 8, ILO Convention 29 and 2014 Protocol, Global Compact Principle 4)

Right to form and join trade unions and the right to strike (UDHR Article 23, ICESCR Article 8, ILO Convention 98)

Right to an adequate standard of living (UDHR Article 25, ICESCR Article 11)

Right to equality before the law, equal protection of the law, and rights of nondiscrimination (UDHR Article 7, ICCPR Article 26, ILO Convention 111, Global Compact Principle 6)

Right not to be subjected to torture, cruel, inhuman and / or degrading treatment or punishment (UDHR Article 5, ICCPR Article 7)

Rights of minorities (ICCPR Article 27)

Right to privacy (UDHR Article 12, ICCPR Article 17)

UDHR Universal Declaration of Human Rights

ICCPR International Covenant on Civil and Political Rights

ICESCR International Covenant on Economic Social and Cultural Rights

ILO International Labor Organisation