

## CODE OF CONDUCT AND ETHICAL GUIDELINES

### FOR SPERRE COMPRESSORS

Incl. Sperre Industri AS,  
Sperre Sveis AS,  
Sperre Asia PTE LTD,  
Sperre China,  
Sperre Korea,  
Sperre Rotterdam BV

This code of conduct formalizes the key principles related to business practice and personal conduct of Sperre Compressors. In selecting customers and suppliers, Sperre Compressors works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of Sperre Compressors.

This code formalizes Sperre Compressors practices and makes clear that, recognizing differences in cultures and legal requirements, we expect that wherever our products and the components that comprise them are produced, they are produced in a manner compatible with the high standards that contribute to the outstanding reputation of Sperre Compressors and our brands. Customers and Suppliers are required to comply with this code and to have and maintain practices similar to those in the Sperre Compressors code of ethics.

This code applies to all facilities involved in the production of products and components for Sperre Compressors. Sperre Compressors strongly encourages customers and suppliers to exceed the requirements of this code and promote best practices and continuous improvement throughout their operations, if there is no local legal requirement, or if a local legal requirement is not as strict as the requirement included in this code.

#### **1. ACT WITH INTEGRITY AND IN COMPLIANCE WITH APPLICABLE RULES, REGULATIONS AND POLICIES**

Integrity is a fundamental building block of trust in business relationships. Sperre Compressors seeks competitive and commercial success through the application of superior individual and collective skills and not through the use of manipulative, deceptive or illegal devices or practices.

All employees, directors, hired personnel etc. (**Employees**) of Sperre Compressors must at all times comply with the laws and regulations that apply to Sperre Compressors and its Employees, as well as applicable internal policies/procedures adopted by Sperre Compressors. This includes e.g. sanctions and export control laws, and the Company has implemented a sanctions policy of which all Employees shall be familiar with and act in accordance with.

#### **2. KEEP YOUR PROMISES**

Conducting the business activity of Sperre Compressors in an ethical manner implies keeping legitimate promises regardless of whether or not there is a legal obligation to do so. Hence, you shall only make promises you are capable of fulfilling.

**3. RESPECT HUMAN RIGHTS**

Sperre Compressors is committed to protect and respect the fundamental human rights of anyone affected by our operations. Sperre Compressors expects its Employees, business partners and other parties directly linked to its operations, products or services to be equally committed to respect internationally recognised human rights.

**4. CONFLICTS OF INTEREST**

Conflicts of interest may arise. All Employees shall take necessary actions to minimize the risk of conflicts of interest arising. Further, you shall act in accordance with the legitimate interest of Sperre Compressors, and not make decisions based on what will benefit you personally.

Employees shall not use Sperre Compressors's name, business contacts or otherwise exploit their position in Sperre Compressors in connection with actions that are not specific to Sperre Compressors's business activities.

Any questions regarding potential conflict of interest shall be raised with your immediate superior.

**5. ACT IN FAIRNESS**

All Employees shall act in a reasonable and just manner based on facts and circumstances. Sperre Compressors supports fair and open competition.

**6. DO NO HARM TO SPERRE COMPRESSORS AND INDUSTRY**

All Employees shall conduct the business in a responsible manner and not engage in practices that are foreseeably damaging to the image of Sperre Compressors, the industry it operates within or its shareholder(s). In their day-to-day work, Employees shall display loyalty to Sperre Compressors and actively seek to conduct all business activities with integrity and honesty.

**7. PROTECT SPERRE COMPRESSORS'S REAL ESTATE, ASSETS AND PROPERTY**

Sperre Compressors's real estate, assets and property shall be safeguarded, and only be used for legitimate business purposes. Further, the business assets and information of confidential nature shall be respected and protected.

**8. CONTRIBUTE TO AN ENVIRONMENTAL SUSTAINABLE BUSINESS ACTIVITY**

Sperre Compressors is committed and work to ensure that its business activity is environmentally responsible and energy efficient, and that the environmental impacts are reduced wherever possible. Sperre Compressors is continuously focusing on environmentally friendly improvements and sustainable developmet. It expects that all Employees do the same.

**9. NEVER CONTRIBUTE TO, OR BE INVOLVED IN, CORRUPTION, MONEY LAUNDERING OR FRAUD**

All Employees shall work against corruption, money laundering and fraud in all its forms. Corruption is unacceptable business conduct, constitutes a threat to fair competition and undermines legitimate business activities. Any violation within our organisation may subject both Sperre Compressors and individuals to criminal liability, and would represent a risk to our reputation.

Further, for the purpose of describing Sperre Compressors's standards and expectations with respect to anti-corruption, Sperre Compressors has implemented an anti-corruption policy of which all Employees shall be familiar with and act in accordance with. The policy covers, inter alia, bribes, trading in influence, gifts, hospitality etc.

**10. DO NOT PURCHASE OR IN ANY OTHER WAY MAKE USE OF ANY SEXUAL SERVICES**

This is forbidden by Norwegian and Swedish law. The prohibition also applies to Employees when travelling in other countries on behalf of Sperre Compressors.

**11. WHISTLE BLOWING**

All Employees have the right to report any criticisable conditions that occur at the workplace to Sperre Compressors. It is important that the Employees use this right. One frequent method for uncovering illegal conditions and unwanted business culture is through whistle-blowing reported by the Employees. Whistle-blowing allows Sperre Compressors to rectify problems and prevent the problems from growing.

**12. WORKING ENVIRONMENT**

Sperre Compressors shall ensure proper labour and working conditions, to safeguard the health and safety of the Employees and to promote the development of the communities in which it operates.

Sperre Compressors expects that all individuals who act on behalf of Sperre Compressors treat everyone with courtesy and respect, regardless of race, gender, national or social origin, disability, sexual orientation, religious belief etc.. Sperre Compressors strives to ensure that no harassment, discrimination or bullying occurs. We believe in equal opportunities, and Sperre Compressors shall be a stimulating workplace with an inclusive working environment. Sperre Compressors believes that it is only then that the Employees will perform at their full potential, and receive the proper recognition and reward for their performance.

**13. APPLICABILITY OF CODE OF CONDUCT**

Sperre Compressors must ensure that all Employees have access to this Code of Conduct, and other relevant internal policies and procedures.

Please note that any breach of this Code of Conduct may have adverse consequences for the Employee's employment and may put Sperre Compressors at risk.

Any questions the Employee may have regarding this Code of Conduct shall be addressed to the Employee's immediate superior, the Compliance Officer or the CEO of Sperre Compressors.

The Code of Conduct shall be available on Sperre Compressors's website communicated internally and externally to all Employees and where relevant to business partners and other parties where appropriate.

Ellingsøy, 11<sup>th</sup> of June 2020  
Ole Nustad  
CEO