

# CODE OF CONDUCT

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## 1 PURPOSE

The main purpose of TA Elektronikk business ethics guidelines is to ensure that everyone who represents the company acts in an ethically sound manner and in accordance with laws and regulations.

TA Elektronikk competes vigorously, but fairly in all countries in which it operates. This is based on the superior quality, productivity and value of its products, services, and employees. TA Elektronikk does not obtain any business advantage through bribery, improper payments or any illegal means.

The guidelines describe the company's main principles of what we consider responsible behavior, but do not cover all contingencies. As an employee, you should always have the ambition to show good judgment, honesty, accuracy and consideration in your work for the company.

## 2 SCOPE

The guidelines apply to all employees in TA Elektronikk and anyone acting on behalf or in the interest of company, including consultants, sponsors, or advisors.

## 3 DEFINITIONS

**Ethical guidelines** Guidelines for dealing with ethical issues that arise in TA Elektronikk and gives practice-oriented guidance and clear instructions on what type of behavior is expected in which situations

## 4 RESPONSIBILITY AND AUTHORITY

The board, via the CEO, has the overall responsibility for the business ethics guidelines and for being in compliance with the guidelines. The individual employee undertakes to be familiar with the regulations and instructions that apply to his/her position at any time and is personally responsible for complying with the guidelines. All managers are responsible for ensuring that the guidelines are known and in compliance within their area of responsibility.

Managers must lead by example. The manager must also ensure that any breaches of the guidelines or any unfortunate cultures developed in the company are immediately discussed.

Managers are also responsible for assessing and, if necessary, proposing more detailed guidelines for the parts of the operations the manager is responsible for. Such guidelines must be approved by the CEO.

TA Elektronikk expects all employees to raise concerns and to ask questions when issues arise. Employees are encouraged to contact their functional manager to resolve issues of concern. It is the responsibility of line management to ensure that appropriate issues of concern are addressed appropriately.

### 4.1 VIOLATION OF GUIDELINES

Any violation of the guidelines could result in the civil or criminal prosecution of the company and the persons involved. Internally, any violation of this guideline may subject the employee to disciplinary action in the form of a warning or termination, with or without notice. Managers have a special responsibility to help protect employees who reveal and report unethical practices.

## 5 DESCRIPTION

### 5.1 GENERAL

TA Elektronikk's success is based on gaining the trust and confidence of our customers and other business partners. To maintain this trust and confidence, we must ensure that our behavior adheres to the values we stand for.

The guidelines shall provide support in relation to the implementation of tasks and in relation to decisions to be made concerning ethical principles handle within our business, and the behavior we expect from our employees at all levels.

If something is not clear, the employee must seek advice and guidance from their manager.

TA Elektronikk shall only be involved in activities that are in accordance with laws and regulations, contracts that have been entered into, and our own guidelines for business ethics.

We shall offer our services and products in such a way that TA Elektronikk and the customer's/business partner's entitlements and obligations are clear. Our marketing and advertising must not be misleading and must provide accurate information about the services and products we offer.

All employees, in contact with customers and business partners, must promote honesty, integrity, loyalty and fairness in all circumstances.

### 5.2 HEALTH, SAFETY AND ENVIRONMENT

Endeavour to take care of health, environment and safety compose an integrated part of our overall business and are based on four main principles: Responsibility for our employees, social responsibility, good customer care and productivity improvements. All employees have a shared responsibility for the work to take place under safe conditions and in a way that safeguards and promotes the health and well-being of the individual and takes care of the environment.

### 5.3 EQUAL OPPORTUNITIES

The continued success of TA Elektronikk depends on its ability to attract, develop and retain a highly competent diverse workforce, and on the creative, effective and productive work life of all employees. We believe that talent exists across all population groups, and diversity of employees is a key business objective. We will conduct our business with due regard to the human dignity and innate worth of each individual.

Our business is based on an inclusive corporate culture, we recognize and appreciates that each of us represents something unique and valuable and deserves recognition for our individual abilities. We do not accept any form of harassment or discrimination based on gender, religion, race, national or ethnicity, cultural background, social grouping, disability, sexual orientation, marital status, age, or political affiliation. We will provide equal opportunities when it comes to hiring and treat all our employees in a fair way.

Anyone believing in good faith that she or he has been subjected to harassment by anyone in TA Elektronikk, or anyone with whom the company does business, should immediately contact her or his manager, HR manager. Complaints and questions regarding possible harassment will be treated in a confidential manner, and all complaints will be investigated. There will be no retaliation for making complaints or asking questions under this guideline, or for responding to questions during any investigation of these matters.

## 5.4 PERSONAL BEHAVIOR

As an employee, it is expected that you take care of your work tasks and generally behave correctly towards business associates, colleagues and others based on mutual respect. This includes being aware of and respecting other cultures and customs. TA Elektronikk does not accept any form of harassment, discrimination or other behavior that may be perceived by colleagues or business associates as threatening or degrading.

## 5.5 SUBSTANCE ABUSE

TA Elektronikk is a drug and alcohol-free workplace and prohibits the use, possession, transfer or sale of illegal drugs in the workplace or at work.

Employees must report to work unaffected by drugs, controlled substances and alcohol, and remain unaffected while they are at work.

In circumstances where alcohol is served when allowed or appropriate according to local customs or during business events, each employee is responsible for behaving in a professional way and show moderation when consuming alcohol on business trips and at events organized by TA Elektronikk.

Employees may not consume, manufacture, distribute, dispense or be under the influence of controlled or illegal substance in the workplace, at any worksite or locations which duties being performed by any employees or third parties.

Many prescription and non-prescription substances have side effects that can affect one's abilities with respect to safe and efficient work. Employees who participate in company's activities and operations, and are taking medications, are responsible for obtaining the necessary information to determine whether the use of such medications can impair their productivity and reduce their ability to perform their work safely and in accordance with all relevant safety regulation. These employees should therefore discuss their duties with their pharmacist or medical professional to determine whether the use of prescription and/or non-prescription drugs negatively affects their ability to perform their work in a completely safe manner. To avoid any violation of this guideline, employees are responsible for contacting QHSE and/or HR management for an assessment of their medication regarding any possible negative impact on safe work performance.

## 5.6 CONFLICTS OF INTEREST AND INTEGRITY

### 5.6.1 FINANCIAL FRAUD AND CONFLICTS OF INTEREST

All employees must avoid situations which involve, or could appear to involve, conflicts between their personal interests and the interests of TA Elektronikk or of our customers. Any personal loans by TA Elektronikk to directors (or any family members) or any guarantees of obligations, are specifically prohibited. In addition, personal loans to other employees are prohibited, unless approved by the appropriate Controller. With regard to particularly sensitive functions and areas of responsibility, each business department should consider the need for routines that can uncover potential conflicts of interest.

### 5.6.2 BRIBES, GIFTS AND BENEFITS

You may not, in order to obtain or retain any commercial or other unfair advantage by virtue of your position, offer, promise or give any undue advantage to a public officer or a business associate with the intent to cause him or her to act or refrain from act in a specific way in relation to its area of responsibility. This applies regardless of whether the benefit is offered directly or via an intermediary.

Gifts or other favors offered to business associates must be in accordance with recognized business practice. Gifts and other favors can only be given or awarded if they are of modest size (never more than 3 percent of the recipient's estimated monthly income), both in terms of value and frequency, and if time and place are not inappropriate. Gifts and other favors must be given in full transparency, vouchers/gift cards must be filled in correctly, and they must be entered in the correct expense account.

As a TA Elektronikk employee, you are not allowed to receive money or other benefits from business associates that could affect or be perceived to affect your integrity or independence. Gifts and other favors can only be received if they are of modest size both in terms of value and frequency, and if time and place are not inappropriate. You must always inform your superior about gifts.

If you are offered or have received benefits that in size exceed what can be said to be natural out of ordinary courtesy, you must immediately inform your line manager, who will decide what needs to be done.

Small payments to ensure or expedite a routine or necessary service to which we are entitled or otherwise entitled must not be made if they give the recipient unfair benefits. Do not allow an agent or intermediary to make unregulated payments. You must supervise what agents/intermediaries do and have the right to terminate their cooperation with them if they use bribes.

### 5.6.3 CONTRIBUTIONS TO POLITICAL PARTIES

Neither TA Elektronikk nor any of our employees must make financial contributions to political parties in TA Elektronikk's name. This does not exclude that we can support political issues that coincide with our own interests, nor does it prevent our employees from engaging in political work as private individuals.

### 5.6.4 INTERESTS IN OTHER BUSINESS ACTIVITIES

All employees are expected to put company business interests ahead of their own. Information about TA Elektronikk's business or prospective business must not be used for personal gain or to compete with TA Elektronikk, directly or indirectly, in the purchase or sale of property or other interests. Employees must not work for a competitor of the company while at the same time working for us.

In addition, all employees must not be directors, officers, agents, or consultants of companies competing against TA Elektronikk. Sometimes employees and members of their immediate families have active interests in other businesses. Relationships between these businesses and TA Elektronikk must be avoided, unless specifically approved by the appropriate Controller. Finally, TA Elektronikk's property, such as equipment, financial assets or confidential information must be used only for proper company purposes.

### 5.6.5 CONFIDENTIAL INFORMATION

Information about our business, technology and innovation ideas can be of great value, and must be managed and protected accordingly. Our general principles of openness and transparency must never preclude the proper securing of information that may be of value to our business. In this context, all employees must comply with our technology protection routines. Information about the business that is not publicly known and knowledge that you acquire in connection with the performance of your work tasks, shall be considered confidential and treated as such. Of particular importance is the prohibition against the use of confidential information for profit, your own or others'. As a condition of employment, all employees must sign a declaration of confidentiality with respect to such information.

### 5.6.6 SECURING ASSETS AND ARCHIVES

All employees and others representing TA Elektronikk are responsible for securing assets and archive material belonging to the company, our customers and other business associates. All such values must be handled with care and consideration, and with particular regard to avoiding loss of value and abuse. Utilization of time, materials, financial resources and properties for purposes without direct relevance to our activities must not take place without the authorization of the right person within the company.

## 5.7 COMPLIANCE

### 5.7.1 RESPECT TO LAW AND REGULATIONS

In general, all employees must comply with relevant laws and regulations in the performance of their work tasks for the company. Employees must not participate in any offenses that may commit with our business relationships, regardless of whether the illegal act can be attributed to TA Elektronikk or the employee personally or not.

### 5.7.2 REGISTRATION AND RETAINING INFORMATION

TA Elektronikk wishes to promote openness and accuracy in all company tasks, while at the same time respecting the duty of confidentiality. As an employee, it is your responsibility to provide the necessary documentation of company business and business relationships. Incorrect, misleading or fictitious information must not be entered in the company's accounts and archives. All transactions must be fully documented and recorded in TA Elektronikk's accounts.

Accuracy in periodic reporting and other public financial communications. Generally recognized accounting principles and guidelines from the internal control system must be complied with at all times.

All TA Elektronikk accounts must be kept and presented in accordance with applicable laws and regulations in the relevant place and legal area. They must not contain incorrect or intentionally misleading information. They must also provide a correct, accurate and detailed expression of the company's assets, liabilities, income and expenses and all transactions and related events, which must be documented in detail. Transactions must not, either intentionally or negligently, be classified incorrectly in terms of entry in the account, business unit or accounting period. Unregistered or unaccounted assets or liabilities must not be held, unless permitted by applicable laws and regulations. No information shall be withheld from either internal or external auditors.

## 5.8 COMPLAINTS, EXPRESSIONS OF CONCERN AND EXEMPTION FROM PUNISHMENT

TA Elektronikk wants to stimulate open discussion about responsible behavior. Such a discussion should take place in a constructive and unbureaucratic manner. This means that as a general rule, you should address issues that concern you and any complaints you may have with your line manager. If you feel that this is not appropriate in a given situation, you can contact the safety representative or representatives for the management team.

Anyone who, in good faith, approaches a relevant body in TA Elektronikk about a possible violation of the law or company guidelines, will be protected from sanctions from TA Elektronikk and all company representatives. Should your inquiry lead to a service error being discovered on our part, it will be considered to your advantage that you reported in relation to any disciplinary measures. It would be considered a violation of these guidelines to discriminate or harass anyone for making such inquiries. Anyone who reports incorrectly with the obvious intention of harming someone may risk disciplinary

action, dismissal or public prosecution. If you feel that you are being harassed in any way because of reporting a breach of this policy, you must contact your line manager or safety representative.

## 5.9 RESPOND TO INQUIRIES FROM THE PRESS AND OTHERS

TA Elektronikk's reputation is greatly affected by our ability to communicate in a consistent and professional manner, with external actors, including the media. TA Elektronikk must always seek to appear as open as possible and be honest and accommodating in its dealings with external actors and stakeholders. To ensure uniform communication with external actors, general inquiries about the company or its employees and all inquiries from the media should be referred to the general manager.

## 6 REFERENCES

- HSE Policy
- Whistle blowing policy