



Code of Conduct



AVRAMAR Code of Conduct

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Leadership Message from the President of the Board

Our values provide the foundations on which to take this legacy forward. A pioneering spirit, stretching business ambitions and a drive for continuous improvements form part of Avramar Group's DNA, but they must always be underpinned by a commitment to operate with integrity and transparency, a respect of human rights and a responsibility for the societies and environments in which we operate. Only by integrating our values into the way we do business can we create truly sustainable growth. We recognize that the global environment in which we operate is often challenging.

Being a European employer, proud of our culture of meritocracy and diversity, also means that we have a blend of cultural expectations and norms across the company.

Competitive pressures are ever-present. And these are just some examples. But the greater the pressures, the greater the effort we have to make to ensure we uphold our values and our high standards of conduct.

This expectation is embodied in our Code of Conduct which is applicable to our Avramar Group management, employees, associates, vendors, suppliers and business partners alike, setting out a clear standard of conduct.

Thank you for living our values and for taking personal responsibility for creating a brighter future.

Warm regards,

Thor Talseth

President

Avramar Group



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Leadership Message from the Avramar Group CEO

Not only words, but actions

Our mission is to Bring the Mediterranean to the Table: Better Fish – Better Lives. We want to inspire millions every year to embrace the best Mediterranean fish, grown with our unmatched skills and passion. We are driven by our three values: Partner to Win, Lead with Care and Inspire to Improve. These are noble, honest expressions of what we would like to achieve as a group, but also as individuals within each company. We would like our consumers, customers, partners and employees to see these attributes in us. However, actions are more powerful than words, and these will only be words and intentions if we don't act upon them. Values combined with actions and our conduct supporting our beliefs are vital for creating a sustainable and respected business - respected by our external stakeholders, but also ourselves.

Leading by example – everywhere in the company

This Code of Conduct reflects not only the way we would like to do business, but also the way we would like to be treated as colleagues and team members. We should lead by good example and expect proper to start at the very top of the organization and throughout all its parts.

A personal commitment – both mine and yours

This is a personal commitment towards which I will put the highest priority in my actions and behavior. It is my expectation to see this commitment throughout the Avramar Group. I am convinced that our future success depends on the way we act towards our partners, society, the environment and towards each other.

Let us act by it and show that we are a group that lives by its beliefs.

Regards,

Alex Myers

Avramar Group CEO



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Introduction to the Avramar Group Code of Conduct

This Code communicates the basic principles, standards, and behaviors necessary to achieve our objectives and uphold our values. It makes clear that we not only follow the law, but also strive to operate with the highest levels of ethics, integrity, and corporate responsibility.

To whom does the Code of Conduct apply?

The principles described in this Code apply to everyone who works directly for or represents the Avramar Group, including all employees and directors of the Avramar Group and its controlled subsidiaries, and third parties who act in a representative capacity. The Avramar Group further requires its contractors, consultants, and other partners to adhere to the Avramar Group Supplier Code.

This Code is supplemented by a number of detailed policies, which offer additional guidance regarding significant risk areas. Although the Avramar Group strives to provide its personnel with clear and abundant guidance regarding their ethical obligations, no guideline can cover every scenario; the absence of guidance to deal with a particular situation does not relieve you from the responsibility to act consistent with the law and highest ethical standards of business conduct at all times. Where there is no specific written guidance on a particular matter, seek help from the Ethics & Compliance Office.

Who manages the compliance program for the Avramar Group?

The Board of Directors is responsible for ensuring that there is an effective ethics and compliance program in place. At the direction of the Board, the Avramar Group CEO & Managing Director have established a dedicated Ethics & Compliance Office to develop, coordinate, and support the ethics and compliance program across the Avramar Group.

What is the role of the Avramar Group Ethics & Compliance Office?

The Ethics & Compliance Office develops, coordinates, and supports the Avramar Group ethics and compliance program. Its responsibilities include, among other things:

- ✦ Empowering Avramar Group's culture of compliance and fostering opportunities for senior leadership to emphasize their unwavering dedication to ethical conduct;
- ✦ Creating and administering a comprehensive ethics and compliance program, designed to prevent unlawful or unethical business conduct, and detect it if it occurs;
- ✦ Assessing compliance risks, and testing to ensure that internal controls are responsive to these risks; and
- ✦ Investigating and remediating alleged violations of law, regulation, the Avramar Group compliance policies, or this Code and ensuring that improper conduct is held to account.



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What is your role?

Ethics and compliance are responsibilities of all Avramar Group personnel. By working for or with the Avramar Group, you are agreeing to fulfill these responsibilities and adhere to our Code of Conduct. Those who fail to follow our Code of Conduct put themselves, their colleagues, and the entire Avramar Group at risk.

The Ethics & Compliance Office can be reached at ethics@avramar.eu



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Culture

Integrity / Speaking Up / Respect & Fairness

Integrity

The Avramar Group recognizes that values are the foundation of culture, that leadership is its architect, and that personnel are its engineers.

What to Know:

- ✦ Integrity is the principle that gives us common purpose in making decisions and provides direction in how to conduct ourselves as an organization.
- ✦ Our commitment to integrity has meaning and effect only when we act consistently with it, reiterate it frequently, facilitate an open dialogue about it, and enforce our accountability for it.
- ✦ The behaviors we allow are the behaviors we encourage, and the practices we reward are the practices that will be repeated.
- ✦ The sum total of our values, behaviors, and practices is our culture.
- ✦ Personnel look to their direct supervisors to model ethical workplace behavior and to leadership to shape culture.

What to Do:

- ✦ Exhibit ethical behavior and speak openly and frequently about the role of integrity in the workplace.
- ✦ Align incentives to reward performance with integrity, rather than performance at any cost.
- ✦ Make hiring and other personnel-related decisions on the basis of character, in addition to merit and qualifications

WATCH OUT FOR:

- ✦ The temptation to assume that our values and culture exist apart from our words and actions.
- ✦ People who resist, rather than support, our culture and commitment to integrity.

Speaking Up

Compliance is the responsibility of all Avramar Group personnel. Anyone who believes a law, regulation, policy, or provision of this Code of Conduct has been, or is being, violated or witnesses other unethical workplace conduct should ask a question or raise a concern.

What to Know:

- ✦ The Avramar Group encourages everyone to raise any compliance questions or concerns they may have, without fear of retaliation.



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- ✦ Individuals who engage in retaliatory action against someone who reports an issue will be subject to disciplinary action.
- ✦ Confidentiality will be maintained in order to protect employees and the investigative process; information will be disclosed strictly on a need-to-know basis.
- ✦ Intentionally false or exaggerated reports and reports made in bad faith will not be tolerated and may be subject to disciplinary action.
- ✦ Where lawful, anyone may raise a question or report a concern anonymously by contacting the Ethics & Compliance Office.
- ✦ Some Avramar Group companies maintain their own ethics and compliance reporting channels, including companies located in countries where anonymous reporting is not available.

What to Do:

- ✦ Raise ethics and compliance concerns in good faith. Refrain from raising a concern against someone simply because you have personal or workplace differences with them.
- ✦ Whenever possible, try to resolve directly any workplace interpersonal issues that you might have or raise them to Human Capital or to a manager before lodging a concern.
- ✦ Cooperate with compliance investigations when requested, so that matters are quickly and properly resolved.
- ✦ Respect the confidentiality of compliance investigations. Refrain from sharing information about an investigation except as directed by your Ethics & Compliance Officer, and do not expect to learn the outcome of an investigation unless you will be implementing or assisting with follow-up actions.

Respect & Fairness

Our strength lies in the talent and diversity of our people, and we respect the rights and dignity of our personnel.

What to Know:

- ✦ The Avramar Group does business in a number of countries and across a spectrum of cultures.
- ✦ Personnel must treat each other respectfully and fairly and not tolerate harassment, abusive, or offensive behavior.
- ✦ Theft or damage of property of the Avramar Group, its personnel, or third parties will not be tolerated and may result in legal or disciplinary action

What to Do:

- ✦ Treat everyone with respect and dignity – never threaten, humiliate, or use suggestive or disparaging language or actions, including in the context of critical feedback.
- ✦ Respect the cultural standards both of the country where you work and of the people with whom you work.
- ✦ Ensure all employment-related decisions, e.g., hiring, promotion, etc., are carried out fairly, consistent with process, and are based on merit and the needs of the business.
- ✦ Report any type of harassment or abuse you experience or observe, such as racial or gender discrimination



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WATCH OUT FOR:

- ✦ Encroaching on others' personal space or unwanted physical contact.
- ✦ Physically threatening statements, even if they are part of a joke or a seemingly obvious exaggeration.
- ✦ Potential violations of employment laws, particularly in the context of exiting an employee or other employment-related decisions.

Information

Confidentiality & Data Privacy / Information Management & Communications / Information Technology

Confidentiality & Data Privacy

We recognize the critical role of confidentiality in an information-based world, and we protect confidential information both when it is our own and when we act as the steward of others' information.

What to Know:

- ✦ Much of the information the Avramar Group personnel encounter in their job responsibilities may be considered confidential to varying degrees. Properly managing that information is a core responsibility we all share.
- ✦ Mismanagement or misuse of confidential information can result in potentially serious legal and regulatory consequences, such as insider trading, breach of data privacy laws, unlawful anti-competitive agreements, or intellectual property law violations.
- ✦ Personal data receives special protections in many jurisdictions. Those protections limit how we use the information and where and with whom we share the information.
- ✦ We respect the privacy of our employees' personal information and limit access to personal records to those with appropriate authorization.

What to Do:

- ✦ Be aware of and safeguard confidential information in your possession, whether it belongs to the Avramar Group or to a third party.
- ✦ Ensure appropriate legal and logistical protections are in place before you accept confidential information from anyone outside the Avramar Group
- ✦ or share any personal data or non-public information internally or externally.
- ✦ Report any unauthorized disclosure of non-public information or personal data to the Ethics & Compliance Office.

WATCH OUT FOR:

- ✦ Discussing confidential information with third parties in the absence of a non-disclosure agreement.



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- ✦ Transferring personal data, including collections of data that may include names and email addresses, between separate Avramar Group companies or across country borders.

Information Management & Communications

We observe regulatory and prudential standards for information management and release communications only after vetting them with appropriate stakeholders.

What to Know:

- ✦ “Document” is broadly defined and includes hardcopy and electronic records and communications, such as email.
- ✦ Many documents are subject to regulations that require their retention for a prescribed period of time.
- ✦ Documents must receive appropriate confidentiality treatment and should be disposed of at the appropriate time.
- ✦ External communications on behalf of the Avramar Group must be accurate, timely, and fully coordinated with and approved by the appropriate internal stakeholders before release.

What to Do:

- ✦ Know which of the documents you have must be retained, and for how long, and maintain them accordingly.
- ✦ Do not dispose of any records that are subject to a legal hold notice, even if beyond the required retention period.
- ✦ Know which of your communications on behalf of the Avramar Group require authorization. Do not release those communications without obtaining necessary approvals **WATCH OUT FOR:**
- ✦ Creating or storing documents without protocols to identify or protect confidential information.
- ✦ Disposal of records without knowing their content or of documents subject to a legal hold notice.
- ✦ Media solicitations for statements regarding Avramar Group business.

Information Technology

The hardware, software, data, and networks that comprise our information technology (IT) resources are critical Avramar Group assets, and we are mindful of the prominent role of cybersecurity in today’s global business environment.

What to Know:

- ✦ Communications made using Avramar Group IT assets, such as a computer, telephone, mobile device, SIM card, email account, network or other electronic resource, and the information stored on them, are company property.



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- ✦ Where legally permitted, the Avramar Group may record communications and monitor activity on company IT resources to ensure those resources are used lawfully and in accordance with our policies and procedures.
- ✦ Email communications, in particular, are often critical evidence in regulatory investigations and litigation.
- ✦ Cyber-attacks are a primary risk for businesses globally, and preventing them requires heightened awareness and vigilance by all Avramar Group personnel.

What to Do:

- ✦ Use your computer, mobile device, and other IT assets properly, whether those devices are Avramar Group IT assets or personal devices used for business purposes.
- ✦ Any personal use of Avramar Group IT assets should be kept to a minimum. Never use your computer or mobile device inappropriately to engage in communications or access sites that are offensive, illegal, or obscene.
- ✦ Protect your computer and mobile device, the information contained on them, and passwords from theft or unauthorized access by others.
- ✦ Take proactive measures to protect our IT assets by flagging phishing links, screening external storage devices, and raising unauthorized software uploads to your IT department

WATCH OUT FOR:

- ✦ Emails, text messages or other electronic communications that contain suspicious information, inappropriate content,
- ✦ or solicitations from unknown sources.
- ✦ Use of social media websites that do not comply with Avramar Group internal requirements.



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Internal Business Conduct

Asset Management & Controls / Conflicts of Interest

Asset Management & Controls

We rely on the Avramar Group policies and procedures to set our organizational standards, and we abide by them to effect compliance with applicable laws and regulations and financial and accounting standards.

What to Know:

- ✦ Delegations of Authority (DOA) establish decision-making authority on behalf of a company. Acting outside your authorization may lead to disciplinary action.
- ✦ Following the appropriate procurement and legal contracting processes maximizes value, protects the organization, and is required by regulators.
- ✦ We require accurate and consistent recording of financial and business information, complying with relevant reporting standards.
- ✦ Misrepresenting facts, skewing financial information, or misappropriating company assets for personal use could be considered fraud or theft and can lead to civil or criminal penalties or employment disciplinary action.

What to Do:

- ✦ Know and stay within your authority under the relevant DOA.
- ✦ Always engage your legal counsel when contracting with a third party and consult your procurement representative.
- ✦ Before signing or forwarding a document containing your signature, confirm your authority and verify the facts for accuracy and completeness.
- ✦ Report any indications or suspicions of financial misstatement, fraud, theft, or other misconduct

WATCH OUT FOR:

- ✦ Requests for sign-off and processing of important documents, such as agreements or contracts, that are rushed or expedited without justification.
- ✦ Improper, incomplete, or hurried quality checking of information that is due for release.

Conflicts of Interest

We require any activities outside of work, whether financial, business, or otherwise, to be lawful, not compromise or appear to compromise the workplace objectivity of our personnel, and not interfere with Avramar Group responsibilities.

What to Know:

- ✦ A conflict arises if financial, business, social activities, or personal relationships may interfere, or appear to interfere, with your workplace objectivity or loyalty to the Avramar Group.



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- ✦ Conflicts of interest resulting from Avramar Group personnel possessing business or financial ties to third-party stakeholders could create business risks and may be subject to local and international regulatory scrutiny.
- ✦ Using the Avramar Group as a platform to advance your outside interests (business or otherwise) or to benefit your friends or family is an unacceptable conflict of interest and could result in disciplinary or legal action.
- ✦ The Avramar Group requires its personnel to declare and seek approval for their potential and actual conflicts of interest or to certify that they have no such potential or actual conflicts.

What to Do:

- ✦ Avoid any activity that creates a conflict, or even the appearance of a conflict, between your personal interests and the interests of the Avramar Group.
- ✦ Disclose any actual, perceived, or potential conflicts that you might have in order to protect yourself and the organization.
- ✦ Follow any restrictions imposed on you as a result of a conflict of interest disclosure.
- ✦ Maintain our credibility, and your own, by being alert to any potential conflicts of interest in your function and reporting them to your business leader or the Ethics & Compliance Office.

WATCH OUT FOR:

- ✦ Personal affiliations with current or potential competitors, customers, or suppliers of the Avramar Group.
- ✦ The blurring of lines between any outside activities and your Avramar Group employment.
- ✦ Hiring, promoting, or supervising a family member or close friend.



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External Relationships

Business Partners / Working with Governments / Hospitality, Gifts & Avoiding the Appearance of Corruption

Business Partners

Our customers, suppliers, service providers, agents, and other business partners play an integral role in our business. We evaluate them carefully before engaging with them, and we expect them to conduct themselves in an ethical and compliant manner.

What to Know:

- ✦ Business partners are expected to comply with applicable laws and regulations and act according to standards of ethics, integrity, and compliance contained in the Avramar Group Supplier Code.
- ✦ Service providers who interact with governments must be vetted with extra caution, particularly in countries perceived to be less than transparent.
- ✦ Business partners must be subject to confidentiality agreements if they have access to confidential or proprietary information.
- ✦ Suppliers should be selected fairly and without a conflict of interest or any kind of favoritism that might compromise the selection process.
- ✦ Suppliers should treat workers fairly, provide a safe and healthy workplace, minimize their environmental impact, and impose the same requirements on their subcontractors.

What to Do:

- ✦ Know your customers, partners, and suppliers. Conduct the due diligence necessary to reasonably assure yourself that their business activities and transactions are legal, reputable, and responsible.
- ✦ Ensure you understand and can describe the services provided by any agent, middleman, or other provider for which you are responsible.
- ✦ Be alert to any payments that look irregular, funds from or to dubious or unknown sources, or customers who appear to lack integrity in their operations.
- ✦ Choose suppliers based on merit and in line with procurement policies and processes.
- ✦ Obtain commitments from your business partners to conduct themselves in an ethical and compliant manner consistent with the Avramar Group Supplier Code.

WATCH OUT FOR:

- ✦ Funds paid from or to companies that do not appear to be affiliated with the business partner or countries not normally associated with the business partner.
- ✦ Any business partner who provides incomplete, suspicious, or overly complicated information.
- ✦ Third parties who hold themselves out as acting for Avramar Group in the absence of an agreement documenting the scope and terms of their mandate.



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Hospitality, Gifts & Avoiding the Appearance of Corruption

We allow the exchange gifts and hospitality in the professional environment only when modest and appropriate under the circumstances and avoid any lavish gifts or hospitality that might give rise to suspicions of corruption.

What to Know:

- ✦ Global anticorruption laws define “bribe” broadly and those definitions include conduct that may be acceptable under many circumstances but is unacceptable when coupled with an attempt to improperly influence a business- related decision.
- ✦ Items of value that could be considered to be a bribe include cash, gift cards, vouchers, gifts, travel, entertainment, favors, internships, employment, loan repayments, and certain charitable or political contributions.
- ✦ Bribes, kickbacks, unfair advantages, and other acts of corruption are strictly prohibited by the Avramar Group.
- ✦ Facilitation payments for expedited goods or services are illegal in most countries. They are prohibited by the Avramar Group.

What to Do:

- ✦ Never offer, give, or accept payment or anything of value (such as a gift) directly or through a third party, in the attempt to gain business or to improperly influence a business decision.
- ✦ Offer and receive gifts and hospitality only in line with our policies.
- ✦ Disclose gifts and hospitality offered to or received by you in line with Avramar Group policies.
- ✦ You must contact the Ethics & Compliance Office if you are, or believe you may be, confronted with a potential facilitating payment.
- ✦ Report any suspicious situations regarding gifts, hospitality, or inappropriate payments to the Ethics & Compliance Office immediately.

WATCH OUT FOR:

- ✦ Third-party consultants who do not clearly describe their work, account for their expenditures, or whose commissions seem unjustified in the context of the services provided.
- ✦ Customers or officials who hint or suggest that certain payments be made to obtain business or information.

Marketplace Conduct

International Trade & Sanctions / Intellectual Property, Fair Competition & Commercial



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Information / Insider Trading

International Trade and Sanctions

We follow applicable laws regarding imports, exports, and countries, entities and people under restriction.

What to Know:

- ✦ International sanctions are restrictions imposed by countries or international organizations, such as the United Nations, to influence the conduct of other countries or organizations. Sanctions may restrict business dealings within particular countries, or with particular persons, entities, or organizations.
- ✦ Most countries have laws regulating imports and exports, which require accurate and complete documentation. The laws control the distribution and use of certain goods, services, or information. For instance, they may seek to prevent military-related use by certain countries or parties.
- ✦ Failure to comply with applicable international trade and sanctions laws could impact the Avramar Group's financing or reputation and may yield substantial civil or criminal penalties for the Avramar Group or its personnel.

What to Do:

- ✦ Work with the Ethics & Compliance Office to understand and comply with international trade regulations and restrictions in jurisdictions that apply to your business.
- ✦ Consider international sanctions risks as part of your assessment of business opportunities and business partners.
- ✦ Consult with the Ethics & Compliance Office when responding to inquiries or questionnaires about activities potentially subject to trade restrictions.
- ✦ Maintain records of all import and export transactions, including purchase orders, contracts, invoices, and payment records.
- ✦ Notify the Ethics & Compliance Office of any suspected or actual non-compliance with applicable international trade laws or sanctions.

WATCH OUT FOR:

- ✦ Business, particularly in countries, individuals, and or persons that are subject to international trade restrictions or sanctions programs.

Intellectual Property, Fair Competition & Commercial Information

We use and gather commercial information fairly, respect intellectual property (IP) rights, and promote fair competition.

What to Know:

- ✦ IP laws protect certain information in the public domain, such as trademarks and patents, as well as some proprietary information, such as business plans and trade secrets.



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- ✦ Antitrust and fair competition laws prohibit certain agreements between, or information sharing among, competitors or businesses within the same supply chain. They also impose onerous disclosure requirements in connection with certain types of agreements.
- ✦ Legitimate sources of competitive information include such things as publicly available literature and industry publications.
- ✦ Gathering information about competitors by theft, misrepresentation, eavesdropping, inducement, or similarly illegitimate means is never acceptable.

What to Do:

- ✦ Respect the IP rights of others.
- ✦ Identify and protect IP developed within the Avramar Group.
- ✦ Do not enter into any discussions with competitors to exchange or share competitive information, such as profits or market share. Remove yourself from any such discussions and report the incident to the Ethics & Compliance Office.
- ✦ Collect and use competitive information only from legitimate sources.
- ✦ Involve your legal counsel when negotiating agreements to ensure those agreements are consistent with fair competition laws and that all necessary disclosures are made.
- ✦ Report any potentially anti-competitive activity, potential violations of intellectual property rights, or other misuse of commercial information to the Ethics & Compliance Office.

WATCH OUT FOR:

- ✦ Discussions at meetings or industry events where any competitor attempts to discuss competitive information.
 - ✦ Internal discussions regarding market share or of a desire to dominate a particular market.
- ✦ Use of trademarked names or patented technology not belonging to the Avramar Group without knowing whether appropriate licensing agreements are in place.

Insider Trading

We observe laws that protect the integrity of securities markets and take steps to prevent market misconduct either by the Avramar Group or by the Avramar Group personnel.

What to Know:

- ✦ Inside information is information regarding a publicly traded company that is not available to the public and that could influence an investor's decision whether to purchase, sell, or hold that company's security.
- ✦ Insider trading is buying or selling any publicly traded security personally or through a family member or others while in possession of inside information.
- ✦ Stock tipping is recommending or encouraging anyone to buy or sell a publicly traded security while you have inside information or inappropriately disclosing inside information.



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- ✦ Individuals involved in market misconduct may be subject to disciplinary action and may be subject to criminal or civil proceedings in many countries.
- ✦ The Avramar Group personnel who also serve as directors of publicly traded companies must obtain written and documented approval and must confirm appropriate information barriers are in place before sharing internally any non-public information obtained from their role as a director.

What to Do:

- ✦ Do not engage in market misconduct either in your individual capacity or in your role within the Avramar Group.
- ✦ Do not discuss or disclose any material non-public information inside or outside the Avramar Group without necessary approvals.
- ✦ Continually monitor and observe any restrictions that may be imposed on your personal securities trading as a result of your role within the Avramar Group.
- ✦ Complete any required disclosures related to your personal securities trading activities.
- ✦ Report suspicions of market misconduct of any type immediately to the Ethics & Compliance Office.

WATCH OUT FOR:

- ✦ Trading activity that takes place around the time as a significant announcement concerning that company.
- ✦ Discussing with family, friends, or associates confidential information related to a company that is listed on a publicly traded exchange.



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Corporate Social Responsibility

Healthy & Safe Workplaces / Serving our Communities & the Environment

Healthy & Safe Workplaces

We are committed to providing a healthy and safe working environment for all.

What to Know:

- ✦ Each of us is responsible for being safety conscious and following safety and security policies and regulations.
- ✦ Making the workplace safe for all requires competent, knowledgeable, safety-conscious people.
- ✦ Inadequate health and safety standards go beyond the health of individuals and can also impact deliverables, quality of work, clients, end-users of our products, and ultimately the Avramar Group's reputation.
- ✦ Our workplaces must be free from alcohol. Substance abuse is prohibited, including on business travel.

What to Do:

- ✦ Be familiar and comply with all health and safety regulations and guidelines applicable to your job and your place of work.
- ✦ Attend and participate in all training relevant to workplace safety.
- ✦ Be alert to what is going on around you.
- ✦ Report to your business leader any health or safety concerns or areas for improvement that you observe.

WATCH OUT FOR:

- ✦ Unsafe conditions or practices at your workplace, such as failures to use safety equipment.
- ✦ Indications revealed during the evaluation of a new project that adherence to safety requirements may be a concern.

Serving Communities & the Environment

We are committed to being good corporate citizens by supporting the communities in which we operate and minimizing our environmental footprint.

What to Know:

- ✦ The communities where we work are important stakeholders.
- ✦ The Avramar Group strives to contribute to the local communities in which it operates through appropriate social and economic development programs.
- ✦ We encourage our personnel to be involved in and supportive of their communities in ways that are in line with our values.



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- ✦ Charitable giving carries risks, particularly regarding the recipient's use of funds. Ignoring these risks can result in unwitting support of unlawful activities.
- ✦ We will live up to our commitment to environmental responsibility and sustainability by operating our global businesses compliantly and in a way that minimizes environmental impact.

What to Do:

- ✦ Ensure any charitable donations by the Avramar Group align with our policies and are properly approved and accounted for. Carefully evaluate potential recipients of charitable funds to reasonably assure yourself of their legitimacy.
- ✦ Understand and comply with all applicable local environmental regulations in the jurisdictions where you conduct business.
- ✦ Carefully evaluate potential environmental issues relating to any project, partnership, or acquisition.
- ✦ Report to your business leader any environmental issues or non-compliance with environmental regulations.
- ✦ Follow the guidelines for environmental sustainability where you work and make efficient use of natural resources.

WATCH OUT FOR:

- ✦ Charitable organizations that provide insufficient information or lack transparency regarding their use of funds.
- ✦ Environmental-related complaints from internal or external sources.



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Our Code of Conduct at a Glance:

- ✦ We are committed to a culture of ethics and compliance in which we conduct our global business with integrity and in accordance with applicable laws and regulations.
- ✦ We encourage our personnel to speak up when they see potential violations of law, regulation, relevant policy, or this Code of Conduct.
- ✦ We treat everyone with respect and will not tolerate unfair treatment, harassment, abuse, or retaliation within the workplace.
- ✦ We protect confidential information and personal data.
- ✦ We carefully select our customers, partners, and suppliers and require that they conduct their business activities professionally, ethically, and in compliance with applicable laws and regulations.
- ✦ We offer and accept hospitality that is reasonable and appropriate, follow global anticorruption laws, and avoid the appearance of any conflict of interest that might harm relationships or reputations or violate applicable law.
- ✦ We are mindful in forming strategic partnerships with governments and the special risks and responsibilities those relationships carry.
- ✦ We protect Avramar Group assets and reputation by observing internal controls and recognized financial and accounting practices.
- ✦ We follow applicable international commercial laws and standards, including intellectual property protections, prohibitions on insider trading and anti-competitive conduct, and provisions governing imports, exports, and international trade.
- ✦ We are good corporate citizens who work to reduce our environmental impact, enhance communities through our service, and contribute to charitable causes in line with our values.