

# Code of Conduct



**westgass**

## Preface

The way we go about our work at Westgass is more important than the work we do. It is essential that we all follow the law, act with integrity, and treat people with courtesy and respect. It is also important that we foster a Company culture based on trust.

To help ensure we are on the right track, we ask our employees, Board members, advisors or anyone acting within the scope of representing Westgass to follow this Code of Conduct (or Code). We also expect similar principles from our business partners. Please apply the Code, the Employee Handbook and any supplementary internal policies, both in letter and spirit.

Use good judgement to make the right call when making decisions. Ask yourself: Is it legal? Is it consistent with the Code? Is it in line with our internal policies? Is it in the interest of the Company as a whole? Would I be happy if someone found out about it in public? If the answer is no, or you're unsure, stop and get advice from your manager. If there are conflicts between our internal documents and the law, then of course the law presides.

If you see anything that appears to, or is likely to breach the Code, talk to your manager or one of our legal representatives. Please don't be afraid to speak up. We value your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a concern in good faith or participates in an investigation of the same, even if it turns out to be unfounded.

Please take your time to read this Code and refresh yourself of its contents at least every year. By following it, you will help us create a great working environment from which we can build a great company.

Thank you.

The use of the terms "Westgass" and the "Company" throughout this document refer to Westgass Group AS, registered under the laws of the Kingdom of Norway, and any companies which it directly or indirectly owns. Similarly, the use of the words "our", "ourselves", "us" and "we" refer to Westgass. The use of the words "you" and "your" refer to an employee.

Updated: December 2025

## Our Values

Be brave.

Be honest.

Be respectful.

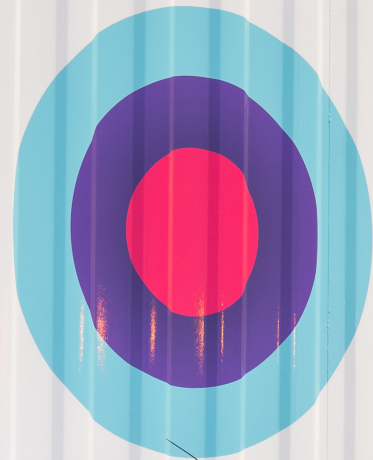
Keep it simple.

Act with integrity.

And have fun!



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westgass

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## Operating Guidelines

By adhering to the following guidelines, you will help us deliver to the highest standards and go beyond the norm. If there's anything you're unsure about, please talk to your manager or one of our legal representatives. While we expect you to follow our Code and our Company Policies, we do not intend to limit or interfere with your legal rights.

### Comply with the Law

You must always comply with the law and regulations. This is non-negotiable. Our legality cannot be compromised. Be ethical and responsible when dealing with each of our stakeholders. We will cooperate with any investigations by legal or regulatory authorities into our or your actions.

### Respect

Treat your colleagues with fairness and respect. We all contribute in our own unique way. We come from a diverse background. We have different ideas and talents. This is invaluable. We see it as a big advantage. It allows us to achieve better results.

### Professionalism

Maintain your professionalism. Think about those around you and our stakeholders. Be open to receive feedback. Together we are the face of Westgass. Please do not tarnish it. We are all responsible for the Company's reputation.

## Equal Opportunity

We promote equal opportunity and expect the same of you. This applies in all aspects of your work, from recruitment, performance evaluation and to interpersonal relations. We make all employment related decisions based on merit, performance and other job-related factors.

### Freedom of Expression

We encourage freedom of expression. Be open. Share your ideas. Be creative. Innovate. But not at all costs – don't offend, participate in serious disputes or disrupt our workplace. Respect personal boundaries. We expect you to foster a well-organised, respectful, fun and collaborative environment.

As an individual, you are entitled to your political views and to participate in the political process in your own time using your own resources. Should you choose to do so, you must make it clear that you are doing so on a personal basis, and not on behalf of Westgass.

### Human Rights

We respect the human rights and dignity of people as outlined in the International Labor Organisation's core conventions. Do not in any way cause or contribute to the violation or circumvention of human rights for example through child labour, human trafficking or forced labour.

Operating Guidelines

Comply with the Law

Respect

Professionalism

Equal Opportunity

Freedom of Expression

Human Rights

Privacy

Harassment,  
Discrimination and  
Victimisation

No Retaliation

Health, Safety, Security  
and the Environment

Alcohol and Substance  
Abuse

Privacy

We respect your privacy. We will only use your personal information when needed to follow the law, or to operate effectively. We may take an interest in what you do outside of work if permitted by law should we have genuine grounds to believe it may affect our reputation or business.

Harassment, Discrimination and Victimisation

We do not tolerate or allow any kind of discriminatory behaviour, harassment or victimisation in any form whatsoever including, but not limited to, exclusion or preference based on ethnicity, race, gender, age, disability, sexual orientation, religion, political views, pregnancy status or marital status. Bullying, degradation, violence, threatening behaviour, offensive messages, inappropriate jokes or knowingly making false reports of misconduct are not permitted.

No Retaliation

Please speak up if you are concerned or aware of any misconduct. You should also cooperate fully when responding to an investigation or audit. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in an investigation of the same, regardless of the outcome.

Health, Safety, Security and the Environment

The health, safety and security of our employees and the environment is of highest importance to us. We operate in a responsible and respectful manner. You should feel safe and free from violence and harm in our workplace. We are committed to minimising our impact on the environment, and to playing our part in building a sustainable future. We ask the same of you.

We also encourage you to look after yourself. Eat healthily. Find time to exercise. Lead a balanced life.

Alcohol and Substance Abuse

We do not permit substance abuse in our workplace. Possession or use of unauthorised or illegal drugs on Westgass premises, when representing Westgass or while engaged in Westgass business is strictly prohibited. Use good judgement when consuming alcohol. You should not carry out any work if your performance is impaired due to the consumption of alcohol. Do not drink in a way that circumvents the law, leads to inappropriate behaviour, results in illegal actions or jeopardises the safety of others.

We encourage you to seek treatment if you suffer from alcohol or substance abuse problems.

## Company's Property

## Confidential Information

## Conflict of Interest

## Competition

## Transacting on behalf of Westgass

## External Communication

### Company's Property

Treat the Company's property, whether material or intangible, with respect and care. Act appropriately to protect it from damage, loss, misuse and theft. The same applies to property that has been entrusted to us by our stakeholders.

Familiarise yourself with, and follow, our IT and Security Policy. Don't misuse Company property or use it for personal gain, anything illegal or anything unethical.

### Confidential Information

Take particular care when handling confidential information, be it our own or that which has been entrusted to us by our stakeholders. Don't use this information for personal gain, whether directly or indirectly. We will not tolerate you sharing this information with unauthorised parties including family, friends and those with whom you have a personal relationship.

Similarly, do not take advantage of a competitor's or former employer's confidential information or intellectual property if you have the opportunity to do so.

### Conflict of Interest

You should avoid any situation where a conflict of interest may arise between your life inside and outside of Westgass. This could be where you, your family, your friends or your

associates stand to benefit at the expense of Westgass or our stakeholders, or because of something you know due to your association with Westgass.

### Competition

Compete fairly. Comply with applicable antitrust and competition laws. We do not tolerate collusion with competitors on pricing, terms of sales and / or customer practices.

### Transacting on behalf of Westgass

Only spend Westgass's money or transact on Westgass's behalf if you have followed relevant internal processes and are authorised to do so. Exercise good judgement. Think about whether it is reasonable and value for money for Westgass. Seek approval from our legal representatives before entering into a contract.

### External Communication

Be careful with your communication outside of Westgass in whatever form it may take. Only designated spokespersons may speak to the media or make public statements and presentations on behalf of Westgass. Do not give the impression or state that you are representing the views of Westgass unless you have been given explicit authority to do so.

## Governance and Financial Integrity

We expect you to honour our internal policies, controls and reporting mechanisms. Financial integrity is crucial to our business. Maintain accurate documentation including financial and fiscal records. Retain records in line with relevant laws, regulations and internal policies. Don't interfere with any audits or try to manipulate or falsify any accounts

## Anti-Money Laundry

The Company does not support or tolerate money laundering, where illegal funds are hidden, made to look legitimate or used to support crime or terrorism. You should always ensure we know who we are doing business with by following relevant due diligence procedures.

## Gifts and Entertainment

Relationships with our stakeholders are important. We value them greatly. We must therefore develop and maintain them in a positive and ethical manner.

Exercise good judgment when offering or accepting gifts and entertainment. Do not do so if it could be perceived that there was an attempt to improperly influence a business decision.

## Bribery and Corruption

We do not tolerate bribery and corruption. You should never offer or accept illegal or unethical reward, whether monetary or otherwise, to gain business, keep business or gain an unfair advantage. This applies whether you do so directly or indirectly, such as through an intermediary.

## Disciplinary Actions

We may have to take disciplinary up to an including termination if you violate our Code. We may also take legal action depending on the situation.

## Waivers

Waivers of the Code may only be granted in writing by two executive officers, or the Board should such waiver be in the favour of executive officers, on an exceptional basis or as permitted by law.





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