



<b>Title:</b> Code of Conduct		<b>Document Responsible:</b> Yasmin Miriam Søderbom	<b>Approved by:</b> Eirik Renli	
<b>Document no:</b> MGT-POL-00006	<b>Rev. no:</b> 1.0	<b>Category:</b> Policies, Visions and Strategies	<b>Approved date:</b> 26.06.2024	

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# 1 Our Values

Fishbones AS (hereinafter “Fishbones”) vision is to be the first consideration for stimulation of reservoirs worldwide. We become what we repeatedly do. To meet our vision, we act according to our values. Our Business Management System sets out the goal that every employee by habit acts according to our core values manifested in a set of principles and guidelines. Our core values are:

- Open & Honest**            We are open & honest towards each other, our customers, suppliers, business partners and interested parties and individuals
- Teamwork**                Our people are the backbone of our company, and collaboration and working together with integrity are our ethos in everything we do
- Making a Difference**    We work to create value for our owners, employees, customers, suppliers, and the communities where we operate and call home
- Excellence**                True excellence demands more than just sporadic efforts. It requires a steadfast commitment to cultivating habits that propel us towards success. So, let's keep focusing on building routines that lead to excellence.
- Respectful**                We hold ourselves to the highest ethical standards and treat our colleagues with the utmost respect. We value diversity and strive to create an inclusive environment where everyone feels welcome and appreciated.

# 2 A letter from the CEO

Dear colleagues,

At Fishbones, we believe that having a strong, fair, and ethical approach to all aspects of our business is essential to our success. Our Code of Conduct is an integral part of our roadmap to excellence. By making this public declaration, we are committing ourselves as a company and as individuals to always do what is right in business.

This Code of Conduct is a mandatory read for all Fishbones employees and for those who are acting on our behalf. We have a zero-tolerance policy towards corruption at Fishbones, and we are fully committed to living up to our values and reputation as a reliable, competent, and ethical company. Our reputation depends on all of us ensuring that the values and commitments outlined in this Code of Conduct become second nature. Therefore, I ask you to do the following:


Firstly, make sure to thoroughly understand our Code of Conduct and communicate its expectations clearly in all aspects of your work, especially when interacting with our business partners.

Secondly, if you have any doubts about what the right thing is to do in any given situation, please seek guidance from your direct manager, CFO or CEO.

Lastly, always speak up whenever you become aware of any behaviour that violates our values and principles or if you suspect a breach of the Code of Conduct.

Eirik Renli

June 2024

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### 3 Understanding Our Code of Conduct

#### 3.1 Purpose

Fishbones' Code of Conduct is a public statement of our commitment to conducting our business with integrity. The main purpose of this Code of Conduct is to ensure that all our business operations are conducted ethically and transparently and that they comply with all Applicable Rules.

Fishbones' Code of Conduct aims to build trust and demonstrate our commitment to being a respected and trusted business. The Code of Conduct is our main governance tool and is designed to be a guide for Fishbones Representatives to act in accordance with Fishbones' core values. It includes references to relevant Fishbones' policies, processes, procedures, resources and tools, that together with the Code of Conduct form Fishbones' governance system. However, our Code of Conduct does not cover all situations, so Fishbones Representatives must use good judgment and seek advice when in doubt.

#### 3.2 Scope

Fishbones' Code of Conduct applies to Fishbones executive managers, vice presidents, directors and employees, as well as those acting for or on behalf of Fishbones, including hired-in personnel, contractors, consultants, and other intermediaries (collectively referred to as 'Fishbones Representatives'). This Code of Conduct aims to provide guidance and support to Fishbones Representatives to conduct Fishbones' business in an ethical manner and in compliance with what is collectively referred to as 'Applicable Rules.' Applicable Rules include laws, rules and regulations, and internationally accepted guidelines, conventions or similar relating to corruption, money laundering, fraud, slavery, environment, human rights, or similar activities.

Fishbones has various business relationships with different entities, organizations and individuals whom we call 'Business Partners.' This includes agents, suppliers, distributors and all other third parties we do business with. We are committed to conducting all our business relationships with integrity and fairness. This commitment applies equally to all our Business Partners.


#### 3.3 Responsibility and Implementation

All Fishbones Representatives must uphold Fishbones' commitment to conduct our business with integrity, by following this Code of Conduct as well as Applicable Rules. A failure to do so will be considered misconduct, which may result in disciplinary actions being taken – including termination of employment – and the case may be reported to the authorities.

The owner and approver of the Code of Conduct is Fishbones' Chief Executive Officer (CEO). The Chief Financial Officer (CFO) is the functional owner and is responsible for the maintenance, communication and monitoring of the Code of Conduct, including implementing changes in Applicable Rules in conjunction with the QHSE function. The CEO of Fishbones is ultimately responsible for the implementation of this Code of Conduct and the monitoring of its operational effectiveness. Fishbones CEO must approve all deviations from this Code.

#### 3.4 Fishbones Representatives' Responsibilities

- Read and be familiar with the Code of Conducts, as well as other relevant Fishbones policies, processes and procedures
- Act consistently with Fishbones' core values and this Code of Conduct, while prioritising safety, ethics, integrity and compliance with Applicable Rules

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- When in doubt about the right approach to take, ask your direct manager and discuss it openly
- Raise questions or concerns if you become aware of possible violations of the Code of Conduct or Applicable Rules
- Participate in mandatory ethics and compliance training
- In the event of an audit, cooperate fully with the relevant investigation by being open, honest and transparent
- If a legal requirement and the Code of Conduct conflict, adhere to the most stringent standard

### 3.5 Additional Manager Responsibility

- Lead by example and be a role model for your team members
- Promote and implement requirements, measures and controls as defined in Fishbones’ anti-corruption compliance program
- Proactively manage integrity risks
- Help your team understand Fishbones’ core values, our Code of Conduct and Applicable Rules and implement them in their work
- Create a safe, respectful and inclusive environment where people feel comfortable to speak up without fear of retaliation
- Enforce the Code of Conduct consistently and hold people accountable for their behaviour at work
- Ensure your team members participate in the mandatory ethics and compliance training

### 3.6 Declaration of Compliance

As a Fishbones Representative, you will be requested to sign an ‘Annual Statement of Compliance’ to confirm that you have read and followed the requirements outlined in this Code of Conduct in the previous year.

Suppliers, sub-contractors, representatives and other contracting parties of Fishbones are expected to have ethical standards that are compatible with this Code of Conduct and shall also sign a declaration confirming compliance with the requirements reflected in this Code.


## 4 Safeguarding Our People, Communities and the Environment

Health, Safety, Security, Environment and Quality (HSSEQ) is always the number one priority in all of Fishbones’ activities. Our people’s well-being and interests are foremost throughout all aspects of our business and how we conduct our affairs.

Fishbones shall be a safe workplace, where the goal is to prevent any kind of harm. Everyone who works for the company – our employees, hired personnel and contractors – shall be able to perform their work in an environment where the emphasis is on safety. Our facilities shall be in good condition and must be planned, designed and maintained in a manner that ensures their technical integrity.

As the provider of an unrivalled technology which reduces the environmental footprint of well stimulation, Fishbones has formally integrated and embedded environmental sustainability into our strategy and decision-making.

Our goal is to contribute to producing oil and gas more effectively to reduce per-barrel emissions, create value and adapt our know-how to new markets.

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Fishbones’ policies on climate & energy, safe operations, security, external environment, and health and working environment further describe the vision, mission and personal commitments that are expected from every Fishbones Representative.

#### 4.1 Respecting Human and Labour Rights

Fishbones aim to conduct our business in a manner which respects the human rights and dignity of people. We support and acknowledge the fundamental principles of human and labour rights as defined in the Universal Declaration of Human Rights and the International Labour Organization’s Declaration of Fundamental Principles and Rights at Work. When evaluating prospective agents, distributors, suppliers or other contracted services, we review any associated human, and labour rights risks, and consider how we can ensure that our business activities do not come into conflict with any of these fundamental human and labour rights principles.

Fishbones will not use child or forced labour and will not tolerate working conditions or treatment that conflicts with international laws and practices. We have zero tolerance for modern slavery and human trafficking.

Fishbones acknowledge its employees' rights to form and join trade unions, and equally their right to remain non-unionized. The company aims to communicate and consult with employees and their trade unions on relevant matters.

##### How does this apply to you?

- Respect the dignity, privacy, and rights of all individuals you interact with during work and business operations
- Never cause or contribute to the violation or bypassing of human and labour rights
- Report any human or labour rights abuse in our operations or those of our Business Partners
- Familiarize yourself with Fishbones’ Human Rights Policy (MGT-POL-00005) and the principles therein

#### 4.2 Valuing Diversity and Providing Equal Opportunities

Fishbones is committed to ensuring that each employee’s unique contributions to the company are encouraged. We must welcome, listen and respect people from different backgrounds and their ideas to ensure everyone can make full use of their talents.


Work-related decisions should normally be based on merit, rather than gender, national origin, religion, ethnic background, race, colour, age, sexual orientation, gender identity, marital status, disability or any other characteristics protected by Applicable Rules.

##### How does this apply to you?

- Treat everyone with dignity, fairness and respect
- Base your work-related decisions on merit, rather than any other characteristic that results in compromising the principle of equality and equity
- Encourage and listen to those who speak up

#### 4.3 Protect Against Harassment and Discrimination

The Fishbones ethos is centred around treating everyone with the same level of fairness, respect and dignity. We do not tolerate any form of abuse, harassment, intimidation, degrading treatment or sexually offensive behaviour

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by or towards our employees or others affected by our business activities. Comments or any other form of offensive messages, derogatory (or disrespectful) remarks or inappropriate jokes are not acceptable.

#### How does this apply to you?

- Contribute to creating a good working environment – free from all harassment
- Never engage in abuse, harassment, bullying, workplace violence, sexually offensive behaviour or other behaviour that colleagues or Business Partners may regard as threatening, degrading or insulting
- Offensive messages, derogatory remarks and inappropriate jokes are never acceptable
- Respect other people’s identity, traditions and culture

## 4.4 Protecting Personal Data Privacy

Fishbones respects the privacy of our employees and will solely use personal information in accordance with Applicable rules and to the extent necessary to ensure efficient operations. Access to personal information is restricted (or limited) and will only be accessible when there is a legitimate need by Fishbones Representatives with the required authorisations.

Fishbones is committed to safeguarding the confidentiality of personal information of our employees and everyone we work with. Personal data will only be used for appropriate purposes and processes in accordance with Fishbones Data Protection procedure (HR-PRO-00002).

#### How does this apply to you?

- Respect the privacy of your colleagues. If your job includes handling personnel data, make sure you comply with Fishbones’ personnel data protection governing documents
- Employees handling personnel data should have the appropriate training in data handling via external or intern sources
- If in doubt, contact Human Resources

## 5 Maintaining Integrity in Fishbones


### 5.1 Fishbones Representative and Business Partners

The reputation of Fishbones is based on the collective behaviour of all Fishbones Representatives and our Business Partners. Fishbones expects everyone involved in the company's operations or on its behalf to act with honesty and in compliance with the applicable rules and this code. We want to collaborate with people who share our commitment to ethical behaviour and adherence, and we intend to clearly communicate our expectations to all business partners. We manage risk by performing integrity due diligence reviews on our Business Partners and mandatory human rights due diligence in line with the Norwegian Transparency Act. We also monitor their compliance where necessary.

#### How does this apply to you?

- Before establishing or amending any business relationship, you must assess all relevant legal and ethical risks
- Implement contractual obligations regarding ethics and compliance where applicable
- Clearly communicate our expectations to our Business Partners, and monitor their compliance where necessary
- Act appropriately if our Business Partners do not meet our expectations, and report any misconduct



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## 5.2 Zero Tolerance for Corruption

At Fishbones, we do not tolerate any form of corruption in our business operations. Each of us is accountable for complying with Applicable Rules related to anti-corruption as well as proactively striving to ensure our Business Partners share this commitment. We shall operate openly and transparently. Engaging in corruption may not only have serious consequences for Fishbones but also on the individual level and may result in criminal charges, penalties or sanctions.

Fishbones Representatives shall not, directly or indirectly through a third party (including family members), offer, give, accept, receive, request or agree to receive any form of improper advantage of any kind. A non-legitimate advantage has no legitimate business purpose and is given to influence the recipient for an unjustifiable purpose, such as obtaining or retaining a business advantage. However, the intention to influence is not a condition for an advantage to be assessed as improper, and the legitimacy of an advantage must be assessed in the specific case.

It is important to keep in mind that corruption does not only come in the form of monetary gifts, but can include anything of value such as travel, accommodation, access to assets, favourable terms or pricing on goods or services, an offer for a job for a family member or a loan (this list is not exhaustive).

Facilitation payments are small amounts paid to a public official to secure or expedite the performance of routine government action that the official is obliged to perform without receiving such payment, and to which the payer has legal or other entitlement. The payment is usually a cash payment but could also involve benefits or favours. There are particularly large risks associated with providing any form of advantage or benefit to a public official, and Fishbones does not permit facilitation payments being paid no matter how small these may be. However, if you genuinely feel that your or another's life, well-being or security is at risk, and you have no other alternative but to make the payment, you may pay the minimum amount possible to remove the risk to your being. Any such situations must immediately be reported to your direct manager and CFO. Such incidents must also be captured in our internal reporting tool – QHSE Reporter.

### How does this apply to you?


- Make sure that ALL payments made are proper and legal, that they are approved by relevant Fishbones personnel, and that they are recorded accurately in Fishbones financial records
- Do not offer or accept any bribes, facilitation payments, kickbacks or other forms of improper payments or advantages
- Make sure you know who you are doing business with by following the Fishbones Due Diligence Process (MGT-CHL-00001) for Business Partners
- Make yourself familiar with Fishbones Anti-Corruption Policy (MGT-POL-00001) and how it applies to you

Fishbones Anti-Corruption Policy sets out in more detail the expectations that the company has for the actions of Fishbones Representatives and Business Partners.

## 5.3 Avoiding Inappropriate Gifts and Hospitality

Fishbones do not allow gifts or hospitality where giving or accepting them could influence business decisions, violate any local laws or the policies of the recipient company, or cause others to perceive such as influence or violation. Fishbones do not expect gifts or hospitality from any of our business partners.

As a general rule, Fishbones Representatives shall not accept or offer gifts or hospitality, except in the limited circumstances as detailed in our Anti-Corruption Policy (HR-POL-00001). Gifts and hospitality may be acceptable if there is a clear business purpose behind it and provided that the cost of such hospitality is reasonable, and they are

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modest in size and frequency. All Fishbones Representatives must exercise caution and sound judgment when considering the reasonableness and proportionality of extending or accepting hospitality.

#### How does this apply to you?

- Make yourself familiar with the Gifts and Hospitality rules as detailed in the Anti-Corruption Policy (HR-POL-00001)
- Never accept or offer a gift or hospitality where it could be perceived to influence decision-making. Ask yourself how the acceptance or offer would be perceived by others and never offer or accept anything that is or could be perceived as an improper advantage
- Never ask for gifts or hospitality from business relations or third parties seeking to do business with Fishbones
- Before accepting or offering hospitality, ensure that it is open, transparent and in line with the rules described in our Anti-Corruption Policy. Obtain written approval from your direct manager, CFO or CEO unless the hospitality is clearly acceptable
- Ensure that all offered or received gifts and hospitality are properly registered in the Gifts and Hospitality Register. This also includes gifts and hospitality that have been offered to you but which you have declined or returned
- Never let an agent or intermediary irregularly make payments – supervise what agents/intermediaries are doing and terminate the business relationship if they make use of bribes
- If you are in doubt, always consult with your manager or the CFO


#### 5.4 Avoiding Money Laundering

Money laundering is the process when a person or entity hides illegally acquired funds – money or all other forms of assets – or tries to make such funds appear legitimate. Money laundering also includes the use of legitimate funds to support criminal activity or terrorism. Fishbones strongly opposes any form of money laundering. To avoid being involved in money laundering, all Fishbones Representatives shall ensure that Fishbones Due Diligence Process (MGT-CHL-00001) is followed and that all concerns are reported in accordance with our reporting procedure set out in section 7.2 of this Code (Report your concerns on the Whistleblower Channel).

#### How does this apply to you?

- Make sure you know who you are doing business with by performing integrity due-diligence investigations/reviews on Business Partners
- Be attentive to attempts to make payments in cash or otherwise unusual banking arrangements
- Report suspicious transactions or incidents of money laundering to Fishbones CFO through our reporting system QHSE Reporter
- If you need a better understanding of money laundering and how to mitigate such risks, seek advice from the CFO



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## 5.5 Protecting Fishbones Confidential Information and Intellectual Property

Fishbones is committed to protecting confidential information. We will not misuse information belonging to ourselves or any of our partners.

Information on the Fishbones business, technology or innovation ideas can be of great value and must be managed and protected accordingly. Our general principles of openness and transparency should never be an obstacle to the proper protection of information that might be of value to our business.

All Fishbones Representatives and Business Partners must in this context comply with our technology protection policies and procedures. Particularly important is the prohibition against using private information for personal or societal gain, whether yours or others.

### How does this apply to you?


- Keep information about activities that are not publicly known and knowledge you acquire in connection with the performance of your duties confidential
- The obligation of confidentiality also applies after the employment or contractual relationship with Fishbones and for as long as the information is considered sensitive or confidential
- Keep confidential all matters that could provide third parties unauthorised access to confidential information
- Carefully consider how, where and with whom Fishbones-related matters are discussed
- A condition for employment or business relationship you must sign a confidentiality agreement

## 5.6 Disclose and Avoid Conflict of Interest

All business matters shall be handled with impartiality by Fishbones Representatives. A conflict of interest can arise when your personal interests or activities may impact, or appear to impact, your ability to make objective decisions on behalf of Fishbones. Such interests or activities can include financial interests in other companies or in transactions, personal relationships, including but not limited to immediate family, or any other interests or relationships, including previous employment at Fishbones' Business Partners, which could improperly affect our judgement and decision-making. Where you suspect that a situation could create a conflict of interest, or even the appearance of a conflict, you should inform your direct manager. Transparency helps Fishbones to better address the situation.

### How does this apply to you?

- Be aware that there are many ways in which conflicts of interest can occur
- Do not work in connection with any Fishbones transaction or project in which you, your partner, a close relative or any other person with whom you or the above-mentioned persons have close relations or have a financial interest
- Disclose situations that might create conflict – or even the appearance of a conflict – to your direct manager
- Before getting involved in internal processes or decision-making involving your previous employer(s), you should discuss your involvement with relevant internal personnel and report the situation to your direct manager
- As a manager, ensure that conflicted individuals are isolated from any operation, influence, and/or decision-making process associated with the subject of the conflict

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## 5.7 Promoting Fair and Transparent Competition

Fishbones shall conduct competition in a fair and ethically justifiable manner, and we will not tolerate any violations of the Applicable Rules related to governing competition. The company is committed to promoting fair and transparent competition and refraining from engaging in any activities that involve unlawfully acquiring, receiving, using or sharing non-public competitive or commercially sensitive information. Examples of such information may include current or future prices, existing contracts, competitive bids, commercial strategies, costs, or other non-public competitive or commercially sensitive information.

### How does this apply to you?

- Do not agree to any form of cooperation on price fixing, illegal market manipulation (such as the allocation of markets by territory, products or by customers) or the restriction supply of goods or services
- Never share non-public commercially sensitive information with competitors. Be vigilant of situations where such information can be exchanged, and speak up against disclosure of information by others
- If you find yourself in possession or become aware of anyone in possession of non-public competitively or commercially sensitive information, immediately contact Fishbones CEO or CFO. Do not discuss or share the information with anyone
- If you have any questions or concerns regarding risks of antitrust or competition exposure for Fishbones, seek advice from the CEO or CFO

## 5.8 Respecting Trade Laws and Sanctions

Fishbones has a duty to comply with trade laws and regulations where these apply to our business activities, including export and import laws and regulations, and sanctions regimes. If you are involved in a transaction or negotiation with entities or people from sanctioned countries or that are otherwise designated for sanctions, you should contact the VP of Supply Chain, VP of Global Operations or CFO for guidance.

### How does this apply to you?


- Business Partners, existing and potential, shall be screened against relevant restricted parties' lists
- Seek advice from the VP of Supply Chain or VP of Global Operations if you believe your dealings might be subject to trade laws/regulations or sanctions regimes
- Obtain and comply with necessary governmental licences where cross-border export or import activity involves restricted items, technology or software

## 5.9 Supporting Local Communities through Sponsorships and Charitable Donations

Fishbones is committed to making a difference in society by acting responsibly and strategically. The company's values and objectives shall be reflected in our sponsorship activities, and there must be evident benefits for Fishbones. All sponsor activities will be carefully selected, implemented and evaluated annually by the Fishbones Corporate Social Responsibility committee.

No religious or political groups or organizations shall be sponsored. Fishbones Representatives are free to participate in political or religious activities on their own private time, provided they don't use any resources that are the property of Fishbones for these activities.

Donations to charitable organizations are either cash or in kind for the benefit of a community or other philanthropic endeavours. Payments are made without expecting anything in return. However, no charitable donations shall be made to political or religious organizations.

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## 6 Safeguarding Fishbones Assets and Interests

### 6.1 Protecting Our Assets and Information Security

We trust you with Fishbones' assets so that you can effectively do your work. We all must act in a manner which ensures that Fishbones' assets are not damaged, misused or lost. Fishbones' assets include patents of invention, licenses, facilities, property, equipment, computers, IT systems, information and funds. Fishbones' assets shall only be used for legitimate business purposes and by authorized personnel.

Breaches in our information security system can damage our business, have serious consequences for our ability to maintain a competitive edge in the market, and constitute a violation of the law. All Fishbones Representatives have a responsibility to detect and report threats to our information security, safeguard Fishbones' information and systems against any unauthorised disclosure or use, and actively work to prevent unauthorised access or disclosure (loss thereof). These principles also apply to confidential information which Fishbones has received from a third party.

#### How does this apply to you?

- Make sure no company assets are damaged, lost or misused
- Make sure your usernames and passwords are secure
- Never use your private email to send or receive Fishbones' internal information
- Be vigilant against cyber-attacks and scams, and report any incidents immediately through QHSE Reporter
- Handle Fishbones information with care and pay attention when travelling. Do not share Fishbones information in public forums or on social media, if not authorised to do so
- Guard Fishbones intellectual property
- You are responsible for your visitors at Fishbones' premises throughout their stay and be aware of who you let in behind you when entering Fishbones' premises

### 6.2 Keeping Accurate and Complete Financial Records


Fishbones is committed to providing a correct, transparent and understandable picture of our business. We provide timely and relevant business information to our employees and stakeholders, as well as Business Partners, government officials, the financial sector and the public. Accurate and objective recording of both financial and non-financial data is required in accordance with the Applicable Rules and relevant accounting standards.

#### How does this apply to you?

- The data and information you submit in our books and records must be accurate, complete and reliable, and in accordance with Applicable Rules relating to accounting and relevant accounting standards
- Never enter false or misleading information in our books and records, or otherwise provide such information to Fishbones or any third parties

### 6.3 Safeguarding Our Brand

Fishbones public communications shall be clear, open and accurate, with a view to strengthening Fishbones' vision, values, strategy, goals and reputation. No unauthorised persons may communicate with the media, including postings on social media, or to the market on behalf of Fishbones. Any information to shareholders and the market as a whole must be dealt with through the CEO in accordance with the Fishbones Communication Procedure (MGT-PRO-00001).

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Fishbones has social media accounts that are used by the marketing responsible, in conjunction with an external marketing and communication agency, to publish news, recruitment opportunities and relevant updates on business activities. Only permitted personnel are permitted to make any postings on these social media platforms. Any private use of social media must not breach confidentiality obligations and should not compromise Fishbones' reputation or business interests. Fishbones participates in public debates where this is deemed to be in Fishbones' interest. Fishbones Representatives have the right to personally participate in the political process. This must, however, be done in a way that makes it clear that your personal views and actions are not those of Fishbones. You should talk to your direct manager if any political activity might have an impact on Fishbones or on your work.

**How does this apply to you?**

- Do not speak on Fishbones' behalf unless authorised to do so
- Exercise good judgement when you use social media
- Adhere to confidentiality obligations when you use social media – do not share Fishbones information
- Show respect towards Fishbones, your colleagues and Business Partners in all external communications

## 7 Operational Principles

### 7.1 Where to Seek Guidance

All Fishbones Representatives must seek advice if they are unsure about their compliance with this Code of Conduct or any other Fishbones policies, processes and procedures. Where the Code of Conduct does not provide answers to your questions, you can consult with Fishbones' department managers, and others from the executive management, QHSE or HR function.


### 7.2 Report Your Concerns through the Whistleblower Channel

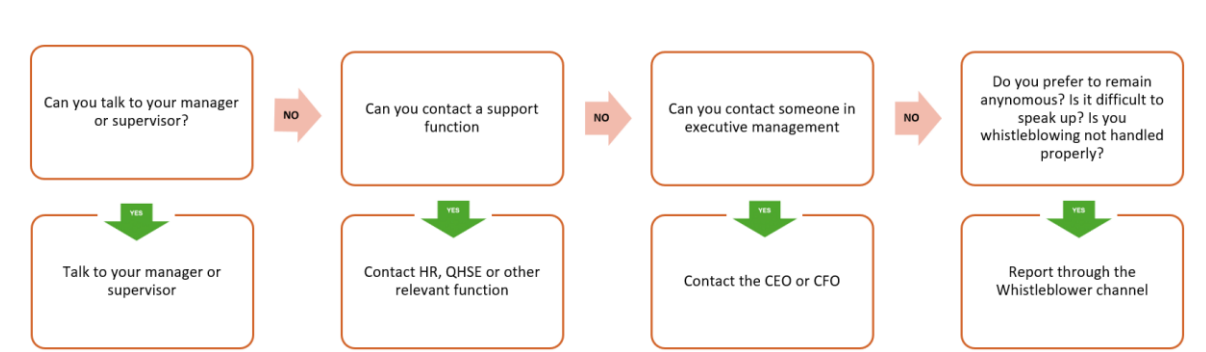
Any suspicions of unethical behaviour, which violates this Code of Conduct, Fishbones policies, processes, procedures and/or any Applicable Rules, are strongly encouraged to be reported to your direct manager without delay. If your report is not addressed properly or if the direct manager appears to be involved in unethical behaviour, consider one of the other options illustrated in the diagram below. If you are unable to speak to your direct manager, other management, relevant functions such as HR or QHSE or a representative from the executive management, you can report your suspicion anonymously through the Whistleblower channel on Fishbones' intranet.

The receiver of a reported concern is responsible for ensuring that such cases are handled appropriately and in accordance with the Fishbones' Whistleblowing Procedure (HR-PRO-00001). Fishbones will not impose any form of retaliation against anyone for making a good-faith report. All reports of suspected violations will be treated with seriousness and acted upon, as necessary.

Examples of issues one can report include cases involving financial crime, environmental crime, harassment, discrimination, an unhealthy working environment, abuse of authority, circumstances that can lead to a risk to life and health, and breach of personal data security.

If you have questions regarding the Whistleblowing process, contact HR or the QHSE function.

<b>Title:</b> Code of Conduct		<b>Document Responsible:</b> Yasmin Miriam Sørderbom	<b>Approved by:</b> Eirik Renli	
<b>Document no:</b> MGT-POL-00006	<b>Rev. no:</b> 1.0	<b>Category:</b> Policies, Visions and Strategies	<b>Approved date:</b> 26.06.2024	



### 7.3 Disciplinary Actions and Criminal Sanctions

Fishbones will not accept any violation of Applicable Rules or of this Code of Conduct, and we take appropriate actions to mitigate such violation. Properly founded allegations or evidence of violations of Applicable Rules or this Code of Conduct will result in investigations, which can result in disciplinary actions if allegations are proven. Disciplinary actions will range from verbal warnings (from department managers or HR) to dismissal. Fishbones will also support criminal investigations and prosecutions when relevant.

Any violations of Applicable Rules may expose both Fishbones and individuals to civil and criminal penalties, such as fines and/or imprisonment.

### 7.4 Training and Monitoring

All employees are required to participate in mandatory training in the Code of Conduct. All managers in Fishbones are responsible for leading by example and ensuring compliance with, and implementation of, this Code, Applicable Rules and the policies, processes and procedures set out in Fishbones’ Business Management System.

The CEO or CFO in conjunction with the QHSE function and HR is responsible for monitoring compliance through a variety of means, including mandatory training, reviewing reports from managers and conducting investigations. Fishbones will periodically arrange independent audits to be carried out to provide additional assurance for the executive management and the Board.

The CEO or CFO will periodically report to the Board on the level of compliance within the company and our operations as well as the outcome of investigations into suspected or actual breaches of the Code of Conduct.