

CODE OF CONDUCT

Nordic Gas values in ethical issues and understanding of appropriate behavior in various situations and in co-operation with various stakeholders are summarized in this Code of Conduct. The Code of Conduct includes corporate social responsibility (Corporate Social Responsibility (CSR)) for a responsible and sustainable society.

The code of conduct include:

- business principles
- environmental principles
- principles on human rights and social justice
- workplace practices

The principles are based on the UN Global Compact-10 principles of international conventions on human rights, anti-corruption, ILO conventions, employment and sustainable development.

For Nordic Gas credibility as a serious company with a sustainability perspective, it is important that the company operated consistently and with integrity in accordance with international principles and in accordance with the laws in force in each country. Success in business depends on it.

All Nordic Gas employees shall be informed of the code of conduct and acting according to its principles in their daily work; in dealings with employees, customers, contractors, suppliers, consultants, government agencies, business partners and other stakeholders.

Nordic Gas will work with contractors, suppliers, consultants, business partners and other stakeholders who share the view and work according to the principles expressed in this code of conduct. In the assessment of potential and current suppliers, should the principles described in this document should be taken into account.

It is the responsibility of the company's managers to communicate and present the content and spirit of this document within their respective organizations and to encourage employees to reveal behaviors that may be incompatible with these principles. The direct or indirect consent of the dubious actions will not be tolerated.

Reports of violations of this code may be made anonymously and confidentially. People who report violations in good faith will not be punished.

This code of conduct will be applied consistently. Failure can result in disciplinary action.

Laws and regulations

Relevant laws and regulations should be complied in each country where activities are carried out.

Accounting and reporting

All financial transactions shall be reported in accordance with generally accepted accounting principles and should report all transactions in a correct and non-misleading manner. Financial reporting must be done in a truthful and correctly way in accordance with the principles that are applicable to the business and in a manner that reflects the economic status.

Anti-corruption

The company shall not participate in or endorse any form of corrupt activities.

Representatives shall not offer customers, potential customers, contractors, suppliers, consultants, government agencies, politicians, any rewards or benefits that are contrary to applicable laws or established commercial practices, in order to obtain or retain business or to gain other improper advantages.

Employees shall not accept payments, gifts or other forms of compensation from third parties that might influence or appear to influence their objectivity in the business relationship.

Money laundering

Money laundering is not accepted, facilitated or supported.

Conflicts of interest

All representatives of the company shall conduct their private and other external activities and financial interests in a way that is not in conflict or appear to be in conflict with this code of conduct.

Employees' private interests shall not influence, or appear to influence, their judgement or actions in their work as representatives of the company.

Company property and resources

Company property and resources must be used for business objectives. Property and resources shall not be used for personal gain, fraudulent, or other inappropriate manner.

Taxation

The company shall comply with the tax laws and regulations of each country where the company operates. If the tax law does not provide clear guidance, prudence and transparency shall be the guiding principles.

Customer offer

The company shall ensure that its products meet all applicable requirements and are designed to have good quality, high security and low environmental impact.

Marketing and sales

Products and services shall be marketed in accordance with the applicable regulatory and legal requirements.

Marketing and sales work shall not contain false statements or provide misleading information regarding the products or their performance, including safety and environmental performance.

Fair competition practices

The company shall compete fairly and with integrity.

The company will not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that improperly influences the market or the result of a tendering procedure.

Only legitimate methods to gather information on competitors of use.

Political involvement

The company shall observe neutrality towards political parties and candidates to public office. Neither the name nor the assets of the company shall be used to promote political parties or candidates for public office interests.

Human rights

Internationally proclaimed human rights should be supported and respected and the company shall not be involved in the violation of these.

Non-discrimination

All employees shall have equal opportunities on the basis of qualifications, experience and skill regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, trade union membership, social background or ethnic_origin.

All employees must be treated with respect. Discrimination, physical or verbal harassment or threats will not be tolerated.

Workplace practices

The necessary conditions for a safe and healthy work environment shall be provided for all employees.

Forced labor

The company shall not participate in or support forced labor, temporary or permanent. The company will also not require some sort of security deposit or confiscate identity documents from employees.

An employee is free to leave his employment after reasonable notice by law and agreement.

Child labor

Child labor is not tolerated. Employees must have reached the age for completing compulsory school, with a minimum of 15 years.

Freedom of Association

All employees shall have the right to join an association representing their interests as employees, to organize and to bargain collectively or individually. The recognized trade unions shall be respected. An employee's right to refrain from joining a Trade Union should be respected.

Working time and remuneration

Applicable laws, agreements and industry standards on working time and remuneration shall be followed.

Resource efficiency

Products and processes must be designed in such a way that the energy, natural resources and raw materials is used effectively and that the quantity of waste and residues which cannot be recycled is minimized.

Ecological sustainability

Materials and energy priorities whose withdrawal/production and coherent long-term emissions do not have a negative impact on nature and can be sustained.

The precautionary principle

Materials and methods that cause environmental and health risks should be avoided and replaced with suitable alternatives when these are available.

Adopted by the Board of Directors 2018-02-28