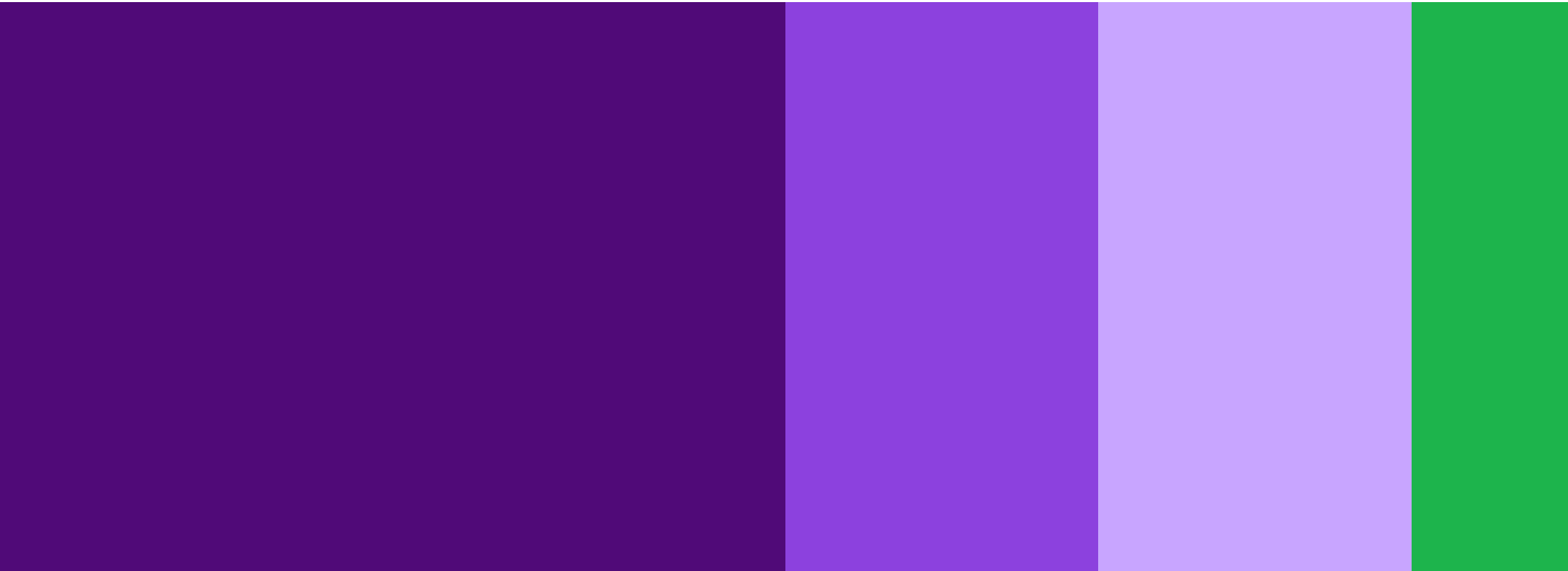
Code of Conduct

Energize with Integrity

omterra

energy for society



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We energize society.



Dr.-Ing. Christian Bruch
President and Chief Executive Officer

Dear colleagues,

This Code of Conduct sets the standards for how we do business at Omterra. Please read it carefully. It explains the principles we must follow and where to find help when the right course of action is unclear. It applies to every one of us, regardless of role, seniority or location.

We all have a responsibility to act with integrity. If something does not look or feel right, say so. If you raise a concern in good faith, you can expect to be heard. Leaders have a particular responsibility to listen and act.

Our actions protect our colleagues, our company and the trust of our customers and partners. I ask each of you to take that responsibility seriously. Thank you.

Kind regards,

Leadership Messages

Dear colleagues,

Our Code of Conduct sets out what integrity means for us today. It is more than a set of rules. It is a practical guide for how we make decisions, work together, and earn trust every day as we energize society.

Everything is connected. The choices we make - from how we select suppliers and respond to customer requests to how we protect data, respect human rights, comply with export control and sanctions laws, and compete fairly - affect our company, our stakeholders, and the confidence our communities place in us.

Our values — Caring, Respectful, Accountable, and Agile — guide how we turn that responsibility into action. They remind us to consider the impact of our decisions, treat people with dignity, take ownership of what we do, and respond thoughtfully in a fast-changing world.

Compliance and integrity are our license to operate. Every day, people across Omterra make decisions with legal, ethical, and reputational consequences. Some are straightforward. Others involve pressure, uncertainty, incomplete information, or competing expectations. This Code is written for those moments. It does not replace judgment - it supports it.

We are here to support you in making responsible decisions. If you need guidance or have concerns, please contact Legal and Compliance, your manager, Human Resources, Employee Representatives, the Speak Up Hotline, or the Ombudsperson. Questions and reports will be handled with care, professionalism, and fairness. Omterra does not tolerate retaliation against anyone who speaks up in good faith.

Responsibility is always on. By living our Code of Conduct every day, we strengthen our culture, protect the trust placed in us, and we energize with integrity.

Best regards,

Dr. Anita Schieffer
Group Compliance Officer and Human Rights Officer

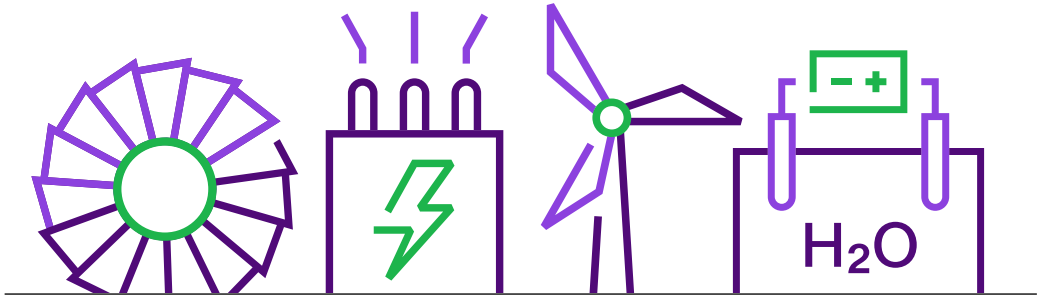
Dr. Ilkin Karakaya
Group General Counsel and Head of Legal and Compliance



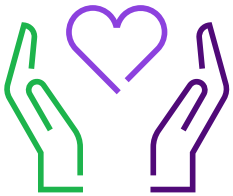
Our purpose and values

We energize society.

Our work brings energy to people and helps societies to develop and prosper. We balance affordability, reliability and sustainability of the solutions we deliver. We live this purpose by driving progress in the world of energy every day.



Our values are the foundation of who we are.



They are what remains when everything else shifts. At Omterra, we are:

Caring

We genuinely look out for each other by prioritizing everyone's safety, well-being and success, while serving our customers and contributing to society in a positive way.

Accountable

We take ownership, follow through on our commitments and deliver results with integrity, holding ourselves to clear standards and creating meaningful impact.

Respectful

We listen actively, include different perspectives, build trust that strengthens collaboration and outcomes and treat everyone with dignity.

Agile

We learn fast, adapt quickly and simplify how we work, so we deliver real value where it matters most.

Our Code of Conduct

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About our Code of Conduct

Our Code of Conduct (our Code) explains how we act with integrity and live our values at Omterra. It replaces the Business Conduct Guidelines. It sets clear expectations for how we do business, treat each other, and serve our customers and communities.

Our Code applies to all directors, officers, employees, and anyone acting on behalf of Omterra. We also expect suppliers and business partners to follow its standards.

Our Code defines our standards, helps us comply with the law, and guides our daily decisions. It complements our policies and procedures by outlining key principles. If you are unsure how to apply it, seek guidance before acting.

Use our Code as a practical resource — read it, reference it, and follow it.

Our Code may not be waived under any circumstances.

Our responsibilities

Each of us must act with integrity and follow our Code. We expect you to understand the rules for your role and seek guidance if something is unclear.

We expect all employees to:

- Act ethically and with integrity
- Follow the law and company policies
- Speak up when something seems wrong
- Protect the company's assets and reputation
- Cooperate in audits and investigations

Our Code is aligned with our Leadership Mindset which defines what everyone stands for at Omterra. It expresses behaviors that unite us, inspire trust, and move us forward. It guides how we work and lead every day. Each element matters equally and is non-negotiable for all of us. Safety and integrity are fundamental, overarching principles that always apply to everything we do.



Managers' additional responsibilities

Responsibility is always on. Managers are responsible not only for results but also how they are achieved. Managers have a heightened responsibility to the company and to the teams they lead. Managers must fulfill their additional organizational and supervisory duties:

- Lead by example
- Clearly define roles, tasks, and expectations
- Select, develop, and support employees based on their skills and suitability for the job
- Ensure and monitor compliance with laws and company rules
- Regularly communicate the importance of ethical conduct and the consequences of misconduct
- Create a safe and open workplace where employees can ask questions and raise concerns
- Prevent retaliation and protect employees who raise concerns
- Report suspected misconduct to Legal and Compliance



Consequences of noncompliance

We take noncompliance of our Code seriously and handle them in accordance with applicable law. Noncompliance may lead to:

- Disciplinary action, up to and including termination
- Fines or other financial penalties for you and the company
- Legal consequences for you and the company, up to debarment and exclusion from contracts



Making good decisions

Good decisions protect you, your colleagues, and Omterra.

When making decisions, you must be certain that:

- Your decisions are in the best interests of Omterra and aligned with our values
- Your decisions are lawful
- You take full responsibility for your decisions
- You are comfortable seeing your decisions or their consequences on the front page of a newspaper

If you are unsure, stop and seek guidance.

Our Compliance System

Compliance is at the core of how Omterra operates. Our Compliance System is based on a culture of integrity which ensures our sustainable future and long-term success. Compliance is nonnegotiable. We have zero tolerance for violations or retaliation. Our Compliance System helps us prevent misconduct, detect risks, and respond when concerns arise.

Our Group Compliance Officer leads Compliance and operates independently, with direct access to Senior Management and the Executive Board.

Our Compliance System helps the business follow the rules, supports daily decisions, and addresses issues as they arise. Every decision we make shapes how Omterra moves forward. Reaching out early can prevent small issues from becoming larger problems. As trusted advisors, we identify risks early, assess their impact, put controls in place, and monitor progress.

Our Compliance System is built on three pillars:

- **Prevent:** We reduce risk through clear rules, training, due diligence, and strong leadership
- **Detect:** We identify risks through monitoring, audits, and reporting channels
- **Respond:** We investigate concerns fairly and take appropriate corrective actions

Compliance is a shared responsibility by everyone within the company.



We speak up

Speaking up protects our employees and our company. If you see or suspect misconduct, unsafe behavior, or a violation of this Code, you have the responsibility to speak up. Your responsibility to speak up is always on.

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How to speak up and get help

To speak up, you have several reporting options to choose from:

- The Speak Up Hotline (available 24/7)
- The Ombudsperson
- A Manager
- Human Resources
- Employee Representatives
- Legal and Compliance

You may report concerns anonymously or choose to identify yourself. Providing your name can help us follow up with you and better understand the issue, but it is your choice.

All reports are handled confidentially. Information is shared only with those who need to review and address the concern.

What to expect when you speak up

When you raise a concern, it will be reviewed promptly and fairly. The process generally includes:

- Assessment of the facts
- Investigation when appropriate
- Resolution and corrective actions

Investigations are conducted objectively and respectfully. They follow the presumption of innocence and comply with privacy obligations. Employees must cooperate honestly and fully with investigations.

Zero tolerance for retaliation

Omterra does not tolerate retaliation against anyone who speaks up in good faith or cooperates in an investigation.

Retaliation may include:

- Threats or intimidation
- Termination, demotion, and exclusion
- Harassment
- Reduced pay or hours

Anyone who engages in retaliation will face disciplinary action. If you believe you have experienced or witnessed retaliation, report it immediately.

Make it current

Q: I reported concerns about possible falsification of financial records. Since then, my supervisor has stopped inviting me to team meetings and has excluded me from several projects. I am worried this is because I spoke up. What should I do?

A: Excluding someone from meetings, projects, or opportunities because they raised a concern may constitute retaliation.

You can do this anonymously, if you wish.

Omterra does not tolerate retaliation against anyone who reports a concern in good faith.

We value our employees

Our employees are the foundation of Omterra. We are committed to a workplace where everyone is treated fairly and with respect. This section explains how we promote equal opportunity, protect well-being, and safeguard personal data. Together, we create a safe and inclusive work environment.

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We respect each other

Our shared responsibility

We treat each other with dignity and respect. Omterra does not allow discrimination, harassment, or other behavior prohibited in our policies or by law. We support equal opportunity and an inclusive workplace. Everyone should feel safe, valued, and respected at work. This applies in person, in writing, and online.

How we energize with integrity

We value each other by:

- Treating others with respect
- Not discriminating against, harassing, or harming others
- Not making or writing offensive jokes, comments, gestures, images, or online messages
- Speaking up when we see or experience inappropriate behavior

Why it matters

Respect builds trust and teamwork. Discrimination or harassment harms people and weakens our culture. It can also create legal risk for the company. We succeed when everyone can work without fear of unfair treatment.

Spark your understanding

- **Discrimination:** Treating someone unfairly because of a protected characteristic, such as ethnic origin, culture, religion, age, disability, skin color, gender, sexual identity or orientation, or worldview.
- **Equal opportunity:** Fair treatment in hiring, pay, promotion, and other job decisions based on skills and performance.
- **Harassment:** Unacceptable behavior that creates an offensive or hostile work environment.

Make it current

Q: Neil keeps making jokes about a colleague's accent, suggesting that their accent would drive away customers and joking that they should be kept away from important accounts. What should I do?

A: This behavior is unacceptable. Mocking or joking about a person's accent targets a personal characteristic and constitutes harassment. Raise your concern through one of the available Speak Up Channels — your manager, Human Resources, the Speak Up Hotline, Employee Representatives, Legal and Compliance, or the Ombudsperson.



We keep our workplace safe, healthy, and secure

Our shared responsibility

Omterra is committed to providing a safe, healthy, and secure work environment. Each of us shares responsibility for preventing injuries, protecting our well-being, and maintaining a secure workplace.

How we energize with integrity

We keep our workplace safe, healthy, and secure by:

- Following all health and safety procedures at all times
- Stopping work and reporting the issue if conditions are unsafe
- Reporting injuries, illnesses, near misses, or unsafe conditions promptly
- Not engaging in threats, intimidation, or violent behavior
- Not working while impaired by drugs or alcohol
- Seeking support if you are struggling with substance use or mental health concerns
- Supporting a culture where safety and well-being are openly discussed

Why it matters

Our work often involves complex operations in high-risk environments. Unsafe behavior can cause serious injury, harm the environment, or disrupt our business. A secure workplace also protects our colleagues, facilities, and communities. We protect ourselves and others by following safety rules and speaking up when something is not right.

Security and crisis management

Security risks can arise anywhere and at any time. Take the following precautions:

- Follow travel security instructions, site security rules, and visitor procedures
- Do not bring weapons or prohibited items into the workplace
- Stay alert to suspicious behavior, unauthorized access, or security threats

Report security incidents immediately to your local security contact and use the security incident reporting tool Enablon.



Spark your understanding

- **Workplace violence:** Threats, intimidation, physical harm, or use of weapons or prohibited items at work.
- **Duty to report illnesses and injuries:** The obligation to promptly report work-related injuries, illnesses, unsafe conditions, or near misses so they can be addressed and prevented.

Make it current

Q: Alex is giving a tour of our facility to guests who are not wearing required safety glasses and helmets. What should I do?

A: Do not take risks. Stop the tour to prevent unsafe situations and inform management to address the risk. Safety must come first.

We safeguard personal data



Our shared responsibility

We protect the personal data of our employees, customers, business partners, and other individuals.

How we energize with integrity

We safeguard personal data by:

- Processing personal data only for legitimate business purposes and as permitted by law
- Accessing personal data only on a "need-to-know" basis
- Deleting personal data once the purpose of processing is complete, unless it is required by law to store longer
- Protecting personal data from unauthorized access, loss, or misuse
- Reporting suspected data breaches or privacy concerns immediately to Compliance

Why it matters

People trust us with their personal data. Misuse or loss of that personal data can harm individuals and expose Omterra to legal and reputational risk. We protect privacy by handling personal data carefully and limiting access to those with a legitimate business need.

Spark your understanding

- **Personal data:** Information that identifies or can identify a person, such as name, contact details, employee records, identification numbers, or health information.
- **Processing data:** Any activity relating to personal data, including its collection, use, transmission, and deletion.
- **Data breach:** Loss, theft, unauthorized access, or disclosure of protected data.
- **Business need:** A valid work-related reason to access personal data to perform your job duties.

Make it current

Q: I received an email with a spreadsheet that includes employee salary information, but I do not need it for my role. What should I do?

A: Do not open, use, or forward the file. Inform the sender that you do not have a business need for the information and report the incident to your manager and the Data Privacy Organization.

We protect our company

We protect Omterra by acting with integrity and using good judgment. Our daily decisions affect the company's reputation and success. This section explains how we avoid conflicts of interest, protect company assets, use technology responsibly, and safeguard financial resources.

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We make decisions in the best interests of Omterra

Our shared responsibility

We make business decisions objectively and with integrity, prioritizing the company's goals and responsibilities over personal interests. We proactively identify, disclose, and avoid actual or perceived conflicts of interest.

How we energize with integrity

We make decisions in the best interests of Omterra by:

- Knowing what conflicts of interest are and how they might influence our judgment
- Seeking guidance when a situation might be seen as improperly influencing our decision-making
- Disclosing actual or potential conflicts of interest
- Not participating in decisions that could improperly benefit us, a family member, or a close personal friend
- Complying with approved mitigation plans to resolve or manage any actual or potential conflicts

Why it matters

Conflicts of interest, whether actual or perceived, can weaken trust and damage our reputation. Our company thrives when our actions are guided by transparency and a shared commitment to our collective success.

Spark your understanding

Conflicts of interest: Situations where our personal interests diverge from the company's interests.

Common types of conflicts of interest:

- Competing with Omterra.
- Sideline work that could impair your job performance at Omterra.
- Significant investment in a third party that is an Omterra customer, competitor, business partner, or supplier.
- Granting benefits to family members or persons with whom you have a close personal relationship.
- Maintaining an intimate relationship with someone in the same reporting line or holding direct or indirect supervisory or decision-making authority over the other.
- Potential conflicts from previous employment in a public sector role or having other connections with a Politically Exposed Person (PEP).

Make it current

Q: Tom works in Sales at Omterra and is offered a paid weekend consulting job by a company that sometimes competes with Omterra. What should he do?

A: Tom must disclose this as a potential conflict of interest. Any sideline work that could interfere with our obligations or performance at Omterra must be disclosed and reviewed, first by the manager and then HR. In some countries, for example Germany, all sideline work must be reported to HR. Please check your local regulations.



We prohibit insider trading



Our shared responsibility

We do not use confidential information for personal gain. If we have insider information about Omterra or another company, we do not buy or sell shares based on that information.

How we energize with integrity

We prevent insider trading by:

- Not buying or selling shares or other securities based on insider information
- Not telling others — including friends or family — to trade based on insider information
- Keeping insider information strictly confidential and sharing it only with authorized persons
- Acting carefully when discussing sensitive topics
- Contacting Legal and Compliance if we are unsure whether information is considered insider information

Why it matters

Using insider information for trading is illegal and can lead to fines or criminal charges. It can also damage our reputation. We protect ourselves and Omterra by handling sensitive information with care. Even casual conversations can create risk.

Spark your understanding

- **Insider information:** Nonpublic information that could have a significant effect on a company's share price. It may relate to Omterra or to a customer, supplier, or partner.
- **Insider trading:** Buying or selling securities based on nonpublic, material information.
- **Tipping:** Sharing insider information that may enable someone else to trade on it.

Make it current

Q: I learned that Omterra will soon announce a major contract that could move our share price. Can I tell a family member so they can invest before the news is public?

A: No. That would be tipping, which is prohibited and a crime. Never share sensitive nonpublic information, and do not trade on it.

We protect Omterra assets and information

Our shared responsibility

We safeguard and manage company assets and information responsibly, including those of our customers, suppliers, and partners. We prevent loss, misuse, and unauthorized access to resources and information.

How we energize with integrity

We protect our company by:

- Using company assets only for legitimate business purposes
- Protecting confidential information and sharing it only with authorized persons
- Respecting the intellectual property of others and using third-party materials only as permitted
- Following safe cybersecurity practices when using company systems and devices
- Following company requirements for retaining and disposing of records, and preserving them if there is a legal hold, audit, or investigation

Why it matters

Omterra's assets and information support our success and customer trust. The same is true for information others entrust to us. Theft, data leaks, cyberattacks, or carelessness can cause legal exposure, financial loss, and reputational harm. We protect Omterra and our partners by handling all assets and information with care and according to our security procedures.

Spark your understanding

- **Company assets:** Property owned or used by Omterra, such as equipment, systems, IT applications, funds, data, and facilities.
- **Intellectual property:** Patents, designs, trade secrets, copyrights, and other protected assets.

Make it current

Q: Rio shares with me a competitor's confidential design file that she obtained from the customer. Can I use it for reference?

A: No. Do not review, copy, distribute, or use confidential information that belongs to another company. The file may contain trade secrets, which are a form of intellectual property protected by law. Inform Legal and Compliance immediately.



We use technology wisely

Our shared responsibility

We use technology in a safe and responsible way. Company systems, devices, and digital tools help us do our work. We protect them from misuse, cyber threats, and unauthorized access.

How we energize with integrity

We use technology wisely by:

- Following company security rules and procedures when using devices, systems, and networks
- Protecting passwords and never sharing login details
- Staying vigilant against phishing attempts or other malicious or suspicious messages and reporting them right away
- Using AI responsibly and only using approved AI tools
- Critically reviewing and validating all AI-generated outputs
- Using only approved company communication channels. We do not use ephemeral messaging

Why it matters

Cyberattacks and data leaks can disrupt our work and expose our company to legal and financial risks. Misusing AI or using unsafe communication tools can lead to unintended disclosures of assets and confidential information. We protect Omterra by using technology carefully and staying alert.

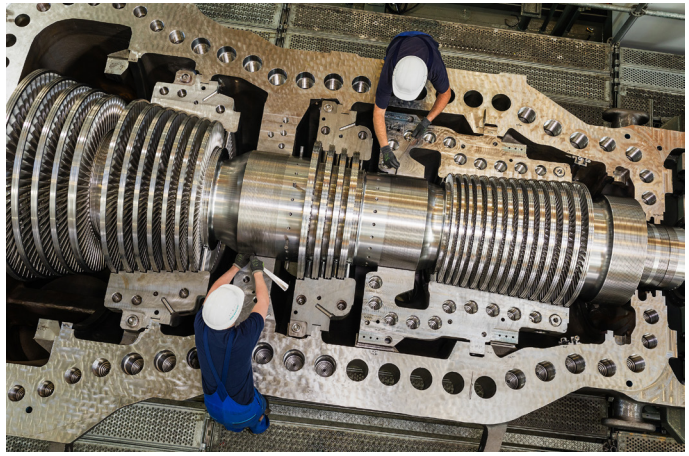
Spark your understanding

- **Cybersecurity:** Protecting systems, devices, and data from attacks or unauthorized access.
- **Phishing:** A fake message that tries to trick you into sharing sensitive information.
- **Artificial intelligence (AI):** Technology that creates content or analysis based on data. AI tools must be used in line with company rules.
- **Ephemeral messaging:** Communication tools or apps that delete messages automatically. These tools can prevent proper recordkeeping and are prohibited.

Make it current

Q: Anika suggests moving a project discussion to a unapproved messaging app that I think automatically deletes messages after they are read. Should I agree?

A: No. Business communications must be retained as required by our policies. Use approved company systems only so records are preserved and compliance obligations can be met.



We safeguard our financial integrity

Our shared responsibility

We ensure that our books and records are prepared on time and follow the rules and standards in the Financial Reporting Guidelines (FRG). This is essential because all financial data is consolidated on a corporate level and reported quarterly to the financial market.

We follow our internal control framework, ensuring that all financial information provided is accurate, complete, and suitable for reporting.

How we energize with integrity

We protect our financial integrity by:

- Following the FRGs in all transactions
- Ensuring every transaction is properly documented, approved, and recorded
- Never creating false, misleading, or incomplete entries
- Providing correct and complete information to support reliable, consolidated financial disclosures

Why it matters

Reliable and accurate financial reporting protects investors, complies with legal requirements, and safeguards the company's reputation. Unreleased, inaccurate, or misleading information can undermine trust, lead to financial losses, result in penalties, damage public perception, and affect our share price.

Spark your understanding

- **Books:** The complete and official set of accounting records that capture all financial transactions in line with applicable accounting standards.
- **Records:** Auditable evidence — including invoices, approvals, contracts, and receipts — showing that the transaction occurred and how it was booked.
- **Financial Reporting Guidelines (FRGs):** Our company's internal accounting and reporting rules govern how financial transactions are recognized, measured, documented, and reported. This ensures consistency with applicable accounting standards and regulatory requirements.

Make it current

Q: At the end of September, Geddy calls his financial counterpart and asks him to move EUR 2 million of project costs to the next quarter without proper documentation. Should he do that?

A: Not without clarification. Our books and records must always be complete, accurate, and truthful. Financial reporting must reflect the facts, not a preferred outcome.



We prevent fraud and money laundering

Our shared responsibility

We protect Omterra's financial integrity by monitoring for unusual circumstances relating to our partners, business relationships, and financial transactions. This helps prevent fraud and money laundering. Business transactions must be plausible, and all financial transactions must be properly documented, approved, and recorded. We also prohibit terrorist financing, including providing money, goods, services, or other assets that may support terrorism. We do not tolerate financial misconduct in any form.



How we energize with integrity

We prevent fraud and money laundering by:

- Never creating false, misleading, or incomplete financial entries
- Performing thorough risk-based due diligence before entering into business relationships and throughout their life cycle
- Ensuring no off-the-books accounts or hidden funds
- Complying with all tax reporting rules
- Reporting all suspected financial fraud and suspicious transactions to Compliance
- Cooperating fully and honestly with internal and external audits

Why it matters

Maintaining accurate financial records helps build trust with investors, customers, and regulators. Fraud or money laundering can lead to fines, criminal charges, loss of contracts, and serious reputational harm.

Spark your understanding

- **Fraud:** An intentional act of deception, such as lying, hiding information, or misusing resources, done to gain an unfair or illegal benefit or to cause loss or financial harm.
- **Money laundering**: The process of hiding the illegal source of money by moving it through legitimate business activities.
- **Off-the-books account:** An account or fund that is not properly recorded in the company's official records. These are prohibited.

Make it current

Q: Signals Inc. bought Omterra spare parts, but payment is made by Presto Corp., which is not part of the contract. Can we accept it?

A: No, not without further clarification. This payment raises red flags and must be reported immediately to Compliance.

We protect our brand

Our shared responsibility

Our brand reflects who we are and what we stand for. Each of us plays a role in protecting our company's and our brand's reputation. We communicate responsibly and ensure that public statements about the company are accurate and authorized.

How we energize with integrity

We protect our brand by:

- Referring all media, investor, analyst, or public inquiries to Communications. Only authorized spokespersons should respond to these inquiries.
- Ensuring that any company-related information shared publicly is accurate and approved
- Using Omterra trademarks, logos, designs, copyrighted materials, and other intellectual property only in accordance with applicable brand guidelines
- Do not post anything that could negatively impact Omterra's brand
- Making it clear when posting personal opinions on social media that the views expressed are your own
- Never disclosing confidential or nonpublic information
- Contacting Brand Design Support (design.ae@siemens-energy.com) for any questions about corporate design and consulting our brand guidelines

Why it matters

Our reputation is one of our most valuable assets. Our brand differentiates us, builds trust, and ensures consistency in our messaging. Inaccurate statements or unauthorized use of our brand can mislead stakeholders, create legal risk, and damage trust. Clear and consistent communication protects Omterra and supports our long-term success.



Spark your understanding

- **Authorized spokesperson:** A person formally approved to speak on behalf of Omterra.

Make it current

Q: Grace, a journalist, contacts me and wants to interview me about Omterra. How should I respond?

A: Do not respond. Forward the inquiry to Communications immediately and align on the next steps.

We act fairly in our markets

We do business honestly and follow the law. Customers, partners, and communities expect us to compete fairly and act responsibly. This section explains how we prevent corruption, follow trade laws, compete fairly, work with governments, and maintain quality in our business relationships.

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05

We do not tolerate corruption

Our shared responsibility

We win business based on the quality of our solutions — not through improper advantages.

We do not tolerate corruption in any of our business activities, anywhere in the world. This includes actions taken through third parties or business partners.

How we energize with integrity

We reject all forms of corruption by:

- Not offering, promising, or giving anything of value to improperly influence a decision
- Not requesting or receiving bribes, kickbacks, or improper payments
- Not giving or receiving excessive gifts, favors, improper payments, or other inappropriate benefits
- Refusing to make facilitation payments
- Ensuring payments are transparent and properly recorded

Why it matters

Corruption harms fair competition and weakens trust. It can lead to fines, criminal penalties for the company and individuals, and serious damage to our reputation. Even one improper payment can cause lasting damage. We protect Omterra by acting honestly and following the law.

Spark your understanding

- **Corruption:** Dishonest behavior used to gain an unfair advantage. It can include bribery, fraud, embezzlement, favoritism, or nepotism.
- **Bribe:** Money, gifts, or anything of value offered, promised, given, or accepted to influence a decision or gain an unfair advantage.
- **Improper advantage:** A benefit that is not lawful or obtained fairly, such as providing special treatment to one bidder over another when awarding a contract.
- **Facilitation payment:** A payment or other benefit given to improperly expedite a routine government action. Omterra prohibits these payments, even in places where they might be common practice.

Make it current

Q: A local official suggests that paying a small “processing fee” could speed up securing a permit. What should I do?

A: Do not agree. Facilitation payments are not allowed.



We comply with trade and export control laws

Our shared responsibility

Acting in a world that never stands still, we comply with all export, trade and customs, sanctions, and anti-boycott laws wherever we operate. Before transferring goods, software, services, or technology across borders, we ensure transactions are lawful and authorized.

How we energize with integrity

We comply with trade and export control laws by:

- Checking the destination, end user, and intended end use of our goods, software, and services
- Ensuring goods, software, and technology are properly classified and reviewed for license requirements
- Stopping transactions if there are signs of illegal or prohibited use
- Refusing unlawful boycott requests

Why it matters

International trade laws protect national security and global stability. Violations can lead to severe fines, criminal penalties, loss of export privileges, and serious reputational harm. Participating in unlawful boycotts can also expose Omterra to legal consequences. We protect our company by ensuring that every cross-border transaction meets legal requirements.

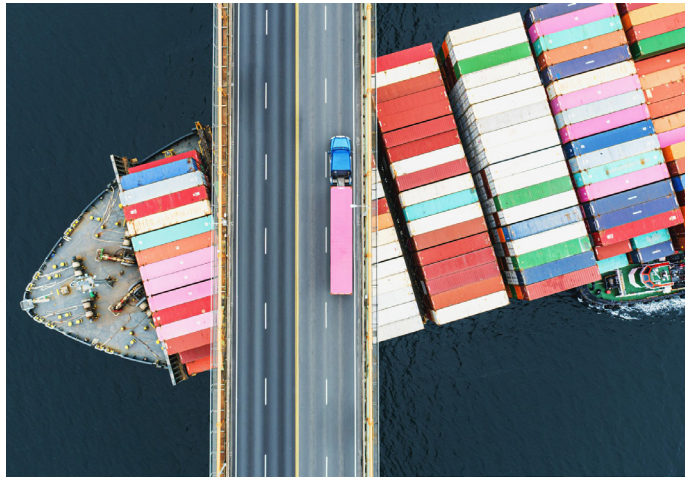
Spark your understanding

- **Export:** The transfer of goods, software, services, or technology across national borders. This includes physical shipments and digital transfers of technology, such as email or remote access.
- **Sanctions:** Government restrictions that limit or prohibit business with certain countries, organizations, or individuals.
- **Boycott:** A refusual to do business with a country, company, or person.
- **Customs:** The legal and regulatory requirements for importing, exporting, and moving goods across borders.

Make it current

Q: Our customer By-Tor Inc. asks me to send Omterra technical drawings to their entity in another country. What should I do?

A: Treat the transfer as an export. Confirm the destination, end user, and purpose. Ensure the technology is properly classified and authorized before sending it. If unsure, contact Export Control for guidance.



We compete honestly and fairly

Our shared responsibility

We follow competition and antitrust laws. We win business with our technology, our skills, and the value we deliver — not through secret deals or illegal coordination with competitors.

Why it matters

Competition drives innovation and gives customers better choices. When competitors coordinate instead of compete, markets suffer. Violations of competition laws can lead to fines for our company and for individuals, criminal charges, and serious harm to our reputation.

How we energize with integrity

We compete honestly and fairly by:

- Not bid-rigging or agreeing with competitors on prices, bids, customers, markets, or other key terms
- Not entering into no-poach agreements
- Not discussing confidential prices, costs, bids, or business plans with competitors — even at meetings or conferences
- Consulting with Legal, if necessary, before offering exclusivity, bundled products, or special discounts, or refusing to supply a product, especially when we have a strong market position
- Consulting with Legal, if necessary, before entering into partnerships or joint projects
- Only attending trade association meetings when there is a clear agenda and proper records are kept and leaving if competitors discuss sensitive topics
- Not using confidential competitor information and only gathering competitive information from lawful sources



Spark your understanding

- **Competition (antitrust) laws:** Laws that protect fair markets. They ban collusion and agreements that illegally limit functioning competition.
- **Bid rigging:** An illegal agreement between competitors to influence who wins a contract.
- **No-poach agreement:** An agreement between companies not to solicit or hire each other's employees without justification. These agreements are prohibited.

Make it current

Q: A competitor approaches me and suggests that we decline to bid for a project, and the competitor will do so next time. What should I do?

A: Stop the discussion. State that we do not discuss our bidding intentions with competitors. Inform Legal and Compliance.

We interact appropriately with government and public officials

Our shared responsibility

When we interact with government customers or public officials, we act with integrity and comply with the law.

How we energize with integrity

We interact appropriately with government and public officials by:

- Following all government bidding, public tender, and contracting rules
- Providing complete and truthful information in bids, reports, and certifications
- Never submitting false, misleading, or incomplete information
- Informing Legal and Compliance immediately if we receive a government request, subpoena, audit notice, or investigation inquiry
- Preserving all relevant documents and records

Why it matters

Government contracts often involve public funds and heightened scrutiny. Errors, false statements, or improper conduct can lead to fines, loss of the contract, and exclusion from future work. Misconduct can also damage our reputation. We protect Omterra by acting honestly and carefully in all government-related work.

Spark your understanding

- **Government and public officials:** Anyone who works for or represents a governmental, legislative, or judicial body; a state-owned or state-controlled company; a public international organization; or a political party. This also includes candidates for public office and other people treated as public officials under the law.
- **Public tender:** A formal process used by a government to request and evaluate bids for a contract.

Make it current

Q: A government official shows up unannounced and asks for documents related to a past project. What should I do?

A: Notify Legal and Compliance right away. Follow local Dawn Raid guidance.



We entertain and exchange gifts responsibly

Our shared responsibility

We exchange gifts and entertain in ways that are transparent, appropriate, in accordance with local rules, and lawful. We never give or accept anything that could influence a business decision — or create the appearance of impropriety.

How we energize with integrity

We exchange gifts and entertain responsibly by:

- Giving and accepting only modest, reasonable, and appropriate gifts or hospitality
- Not offering or giving gifts of cash or cash-like items
- Never making an offer or accepting anything to influence a decision or gain an unfair advantage
- Using extra care when dealing with government and public officials: even small courtesies may not be allowed
- Following all approval, disclosure, and documentation rules
- Recording gifts and entertainment accurately in our books and records

Why it matters

Gifts and entertainment can help build strong business relationships. But if they are inappropriate, too frequent, or poorly timed, they can damage trust and create legal and reputational risk. Even the appearance of improper influence can harm Omterra, especially when we work with government customers. We protect our company and each other by using good judgment and acting with transparency.

Spark your understanding

- **Gifts or hospitality:** Anything of value offered or received. This includes meals, travel, entertainment, tickets, discounts, services, or other courtesies.
- **Government and public officials:** Anyone who works for or represents a governmental, legislative, or judicial body; a state-owned or state-controlled company; a public international organization; or a political party. This also includes candidates for public office and other people treated as public officials under the law.

Make it current

Q: I want to invite my customer YYZ Ltd. to dinner at a high-end restaurant. How much can I spend without prior approval? Is there a threshold?

A: There is no specific threshold under which gifts or entertainment are automatically allowed. Think about the timing, value, and circumstances, including the position of the participants. If the invitation influences or appears to influence an important business decision, do not offer it. When in doubt, speak with Compliance.



We deliver safe, quality products

Our shared responsibility

We design, build, and deliver products and services that meet applicable safety and quality standards. We keep our technical promises and never compromise on safety or compliance to meet deadlines or reduce costs.

How we energize with integrity

We deliver safe, quality products by:

- Following applicable safety, security, engineering, and quality standards and requirements
- Performing required testing and inspections and documenting the results accurately
- Never falsifying or altering test results, certifications, or technical records
- Reporting suspected defects, nonconformances, security breaches, and safety concerns immediately
- Stopping work and escalating if product safety or quality is at risk.

Why it matters

Our technologies power critical infrastructure around the world. Product failures can put people at risk, damage the environment, and disrupt essential services. They can also lead to legal action, financial loss, and harm to our reputation. We protect customers, communities, and Omterra by building safety and quality into our work.

Spark your understanding

- **Product safety:** We take reasonable and appropriate measures to help ensure that our products and services do not create unacceptable risks to human health and safety, property, or the environment when used for their intended purpose.
- **Quality standards:** Technical, legal, and regulatory requirements that our products and services must meet.
- **Nonconformance:** A failure to meet a required safety or quality standard.

Make it current

Q: When a project falls behind schedule, Ms. Barchetta suggests skipping a required test to save time. What should I do?

A: Do not skip the test. Safety and compliance come first. Raise the concern with your manager or Quality team and ensure all required steps are completed before proceeding. Contact Compliance if necessary.



We market our products honestly and accurately



Our shared responsibility

We speak truthfully about our products and services. All marketing materials, sales presentations, and public statements must be clear, accurate, and based on facts and supported by reliable data, testing, or verified analysis.

How we energize with integrity

We market our products honestly and accurately by:

- Making sure product descriptions and performance data are accurate and complete
- Making sustainability claims based on appropriate, reliable, and documented evidence
- Not exaggerating benefits or hiding important limitations
- Avoiding any statement that could be seen as greenwashing
- Correcting any statement that later proves to be incorrect or misleading

Why it matters

Customers, investors, and communities rely on what we say. If we make false or exaggerated claims, we can face legal penalties and lose trust. We protect Omterra by making sure our words match reality.

Spark your understanding

- **Greenwashing:** Claiming environmental benefits that are not supported by real evidence or overstating the actual impact of environmental efforts.

Make it current

Q: A draft brochure calls a product “carbon neutral,” but the supporting analysis is not finished. Can we publish it?

A: No. Environmental claims must be backed by verified data. Wait until the analysis is completed and confirmed before publishing it.

We work with responsible business partners

Our shared responsibility

We choose our business partners carefully and expect them to meet our legal and ethical standards. Understanding that everything is connected, we can be held responsible for the actions of our business partners. For that reason, we take steps to assess and monitor compliance risks before and during the relationship.

How we energize with integrity

We work with responsible business partners by:

- Conducting risk-based due diligence before engaging a business partner
- Monitoring partners throughout the business relationship
- Obligating business partners to follow our compliance and integrity standards
- Escalating warning signs, including potential money laundering concerns, to Legal and Compliance immediately
- Reviewing, suspending, or terminating relationships with partners who fail to meet our Compliance standards

Why it matters

Third parties can expose Omterra to legal, financial, and reputational risks. Misconduct by a business partner may be attributed to us. We protect our company and our stakeholders by working with reputable business partners who share our commitment to integrity.

Spark your understanding

- **Business partner:** Any third party that acts for or with Omterra, including agents, distributors, consultants, and consortium partners.
- **Due diligence:** A risk-based review conducted before and during a business relationship to identify and address potential compliance risks.

Make it current

Q: We urgently need services from a company that is not yet an approved business partner to meet project deadlines. My manager wants to proceed immediately. What should I do?

A: Do not proceed. You need to follow the business partner process to ensure a proper due diligence is performed before proceeding. Consult your Compliance Officer for the next steps.



We care about communities

Our activities impact the communities where we operate, including employees, workers in our value chain, and other affected stakeholders. This section explains how we care about the environment, respect human rights, support communities, and act responsibly in public life.

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We care about the environment



Our shared responsibility

Engaging in sustainability and climate action efforts is part of how we do business. We seek to reduce our environmental impact across our operations and value chain.

How we energize with integrity

We protect the environment by:

- Following all environmental laws
- Reducing energy use, emissions, and waste wherever possible
- Conserving materials, water, and other natural resources
- Considering environmental impact when designing, sourcing, producing, using, and disposing of products
- Working with suppliers who meet environmental standards

Why it matters

Environmental harm can injure people, damage property, disrupt operations, and lead to fines and loss of trust. We support long-term sustainability by improving efficiency, lowering emissions, conserving resources, and reducing waste.

Spark your understanding

- **Sustainability:** Operating in a way that meets today's needs while protecting resources and the environment for the future.

Make it current

Q: I notice that waste is being handled in a way that may not meet environmental rules. What should I do?

A: Report the concern to your manager, local Environment Protection, Health Management, and Safety, or Compliance. Do not ignore it. Early action can prevent harm.

We value human rights

Our shared responsibility

We respect internationally recognized human rights standards in all our operations and across our value chain. We are committed to identifying and minimizing potential adverse impacts from our global business activities on human rights. We are committed to treating people fairly, preventing harm, and promoting safe and decent working conditions. Omterra expects our employees and business partners to adhere to these human rights principles.

How we energize with integrity

We value human rights by:

- Identifying and assessing human rights risks, taking preventive or mitigation measures when necessary, and monitoring progress to reduce harm
- Prohibiting forced labor, child labor, and human trafficking in our operations and supply chain
- Respecting workers' freedom of association and right to collective bargaining and promoting constructive dialogue in line with applicable laws
- Providing fair wages and complying with working-hour regulations
- Considering the needs of people who are particularly vulnerable, such as migrant workers or members of marginalized communities
- Providing reporting channels for workers and affected stakeholders to raise concerns

Why it matters

Everything is connected. Human rights violations can cause serious harm and damage trust. We value human rights by identifying risks early and taking action to prevent or reduce harm.



Spark your understanding

- **Human rights:** Universal, inherent, and inalienable freedoms and protections that every person possesses.
- **Forced labor:** When a person works against their will due to threats, coercion, or abuse.
- **Child labor:** When a child performs work below the minimum legal working age or their employment exposes them to danger or exploitation.
- **Internationally recognized human rights standards:** Those standards outlined in the Human Rights and Environmental Protection Policy Statement.

Make it current

Q: I heard that the employees of our subcontractor work excessive hours. What should I do?

A: Report the concern so it can be reviewed. Human rights risks must be assessed and addressed. If confirmed, corrective action may be required.

We Support Communities



Our shared responsibility

Our community activities must reflect our values and follow the law. We do not use charitable contributions to improperly gain business or influence decisions.

How we energize with integrity

We support communities by:

- Making charitable contributions for legitimate community purposes and in accordance with applicable laws and company requirements
- Not promising or providing donations to inappropriately win business or gain advantage
- Ensuring contributions are properly reviewed, documented, and transparent
- Keeping donations religiously and politically neutral

Why it matters

Supporting our communities reflects our values and builds trust. We ensure charitable contributions are transparent, lawful, and aligned with our business objectives.

Spark your understanding

- **Charitable contribution:** A donation of money, goods, or services to support a community or social cause.

Make it current

Q: A local group asks for a donation while we are bidding on a contract in the same area. What should I do?

A: Do not make or promise a donation before submitting the request to Compliance, so it can be reviewed properly.

We engage in political activities responsibly

Our shared responsibility

Omterra is politically neutral. The company may take part in public policy discussions, but only when allowed by law and properly approved.

How we energize with integrity

We engage in political activities responsibly by:

- Staying politically neutral
- Not using company money, assets, or work time for political contributions without approval
- Ensuring that only approved lobbying activities are performed on behalf of Omterra
- Never offering political support to inappropriately win business or gain advantage
- Not referencing or representing Omterra when engaging in personal political activities

Why it matters

Political activity can create legal risk and damage trust. We protect Omterra by keeping company political activity lawful, transparent, and separate from personal political activity.

Spark your understanding

- **Political contribution:** Money or support given to a political party, candidate, or campaign.
- **Lobbying:** Engaging public officials to influence laws or public policy or engaging third parties to do so.

Make it current

Q: A government representative requests a political donation to secure a public contract. Can I do that?

A: No. We never offer political support to improperly win business or gain advantage.



We support collective action

Our shared responsibility

Collective actions efforts, when performed properly, level the playing field, help prevent corruption, promote compliant business, and build trust.

How we energize with integrity

We support collective action by:

- Participating in industry group initiatives, and other collective action efforts, that promote ethical conduct
- Promoting integrity pacts to create transparency, ensure accountability, encourage fairness, and prevent corruption

Why it matters

For Omterra, involvement in collective action can reduce corruption and third-party risk by aligning competitors, customers, and public stakeholders around shared integrity standards, especially in high-risk markets. It also strengthens Omterra's credibility with regulators, customers, and investors while helping level the competitive playing field for ethical business.

Spark your understanding

- **Collective action:** Working with industry groups, civil society, or public bodies to promote ethical standards and reduce corruption.
- **Integrity pact:** An agreement to act transparently and avoid corruption, often used in connection with public contracts.

Make it current

Q: A public customer proposes that all bidders join an integrity pact to increase transparency and fairness in a tender. Can Omterra participate?

A: Yes — but only after Legal and Compliance have assessed the arrangement.



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