

CatalystOne Solutions

Internal Code of Conduct

[April 2026]

Purpose of Code of Conduct

CatalystOne’s Code of Conduct defines the principles for all our business dealings, applicable to both individual employees and the organization as a whole. This Code of Conduct is intended to ensure that our core values and ethical standards are integrated across all entities within the CatalystOne group.

Our ethical guidelines are supported by all relevant legal obligations related to our operations, while related policies and procedures give more detailed guidance on how these principles are applied in practice. Where this Code of Conduct and supporting policies address the same topic, the stricter requirement shall apply. We will comply with all applicable laws, regulations, and industry standards governing our business activities. This includes but is not limited to regulations related to anti-bribery and corruption, money laundering, data protection and privacy, intellectual property rights, and fair competition.

CatalystOne is committed to maintaining the highest standards of ethical conduct in alignment with the Transparency Act and OECD guidelines. We believe that conducting business with integrity is fundamental to our success and enables us to build trust with our stakeholders.

By following this Code of Conduct, we demonstrate our commitment to ethical business practices, transparency, and accountability. CatalystOne believes that upholding these standards is crucial for building trust, fostering positive relationships, and achieving mutual success with our stakeholders.

Our values

Our values reflect what has shaped CatalystOne over time and what we expect to see in our daily work. They help us translate our culture into consistent actions and decisions, and they support the expectations set out in this Code of Conduct.

Dedication

We take pride in our work and are dedicated to going the extra mile to achieve the desired results.

Agility

We are open, flexible, and creative, and we adapt to every situation to ensure we find the optimal outcome for our customers.

Results

We seek to create value in everything we do, focusing on long-term goals and short-term wins.

Trust

We trust in ourselves, our colleagues, and our customers, and we take responsibility in all our relationships.

Who does our Code of Conduct apply to?

Our Code of Conduct outlines the expected behaviors and practices for CatalystOne employees in interaction with colleagues, customers, stakeholders, and society at large. It applies to all CatalystOne employees, regardless of their role, position or term of employment.

CatalystOne requires our suppliers and their subcontractors to adhere to the same ethical standards that we maintain. CatalystOne has established a specific Supplier Code of Conduct, which codifies the principles we expect our suppliers to adhere to and implement.

How do we use our Code of Conduct?

Our Code of Conduct provides us with assistance and direction for navigating challenges and ethical dilemmas and states who to contact if we have any questions. This Code cannot anticipate every dilemma or situation we might face. As our business grows and changes, new challenges will emerge, and we may find ourselves in uncharted territory regarding compliance with laws and regulations. Despite this, we must uphold our ethical integrity and seek guidance to ensure we make informed decisions.

In addition to describing our own ethical standards, our Code of Conduct also requires us to follow all applicable laws and regulations. You must always be familiar with the laws in the area in which you work and seek guidance if you have any questions.

Ethical dilemmas

If you find yourself in an ethical dilemma and are not sure what to do in the specific situation, ask yourself:

- Is the proposed course of action legal?
- Is it consistent with CatalystOne's values, ethical guidelines, and procedures?
- Would I be comfortable telling my colleagues, managers, friends, and family about the matter?
- What would be the consequences if it were reported in the mainstream or social media?
- Is it morally justifiable?

Ethical behavior

We expect all individuals associated with our company to act with integrity, honesty, and professionalism. Employees should avoid situations where personal interests conflict with the interests of the company, customers, or stakeholders. Any potential conflicts must be disclosed promptly. We strictly prohibit offering, accepting, or soliciting bribes or any form of corrupt practices. Gifts, entertainment, or other favors should be given or received only within legal and ethical boundaries. For more information, see our Gift and Recognition Policy.

We respect the intellectual property rights of others and ensure that proprietary and confidential information of our company, clients, and partners is protected and used only for authorized purposes. We compete fairly and honorably in all business activities, promoting free and open competition. This includes compliance with antitrust and competition laws to prevent anti-competitive behavior.

Make your voice heard!

We encourage all individuals associated with our company to report any suspected or known violations of this Code of Conduct. We will investigate such reports promptly and without retaliation. All reports are handled confidentially in accordance with our Whistleblowing Policy.

As a general rule, you should notify your manager or, if appropriate, your country manager. You can also report the matter to HR, or for anonymous reporting use the [Integrity Line](#) - CatalystOne's whistleblower channel.

Standards of Conduct

Personal conduct and behavior

We value diversity and treat all individuals with respect, fairness, and dignity. Discrimination or harassment based on race, color, ethnicity, national origin, gender, age, disability, sexual orientation, religion, or any

other protected characteristic is strictly prohibited. See our Anti-Harassment and Anti-Discrimination Policy.

Health and safety

We are committed to providing a safe and healthy work environment for all employees and stakeholders. We will comply with applicable health and safety regulations, address potential hazards, and prioritize employee well-being. See our Health, Safety and Environment (HSE) - Policy.

Environment and Sustainability

As a Miljøfyrtårn-certified company, we acknowledge our responsibility to the environment and the importance of integrating sustainability into our everyday work. Each of us has a role in helping CatalystOne reduce its environmental impact and contribute to our broader sustainability goals, see our Health, Safety and Environment (HSE) - Policy. We encourage employees to make thoughtful, responsible decisions that support resource efficiency, reduce waste, and align with our environmental commitments.

Our commitment goes beyond compliance — it is about contributing to a healthier, more sustainable future for our customers, colleagues, and communities.

Human rights

CatalystOne is dedicated to respecting and promoting internationally recognised human rights across our operations and value chain. This commitment is aligned with the Norwegian Transparency Act and the OECD Guidelines for Multinational Enterprises. We recognise that our products, services, and business relationships can affect people – including our employees, customers, end users, and individuals working in our supply chain – and we take responsibility for identifying and addressing negative impacts.

We comply with applicable laws and regulations related to human rights and labour practices, and we continuously improve our approach as expectations and legal requirements evolve. We expect all employees, contractors, and suppliers to uphold these principles. Human rights considerations are integrated into our Supplier Policy and related supplier due diligence processes.

We respect and support the internationally recognized human rights principles and standards as outlined in the Universal Declaration of Human Rights.

These include, but are not limited to:

Right to Equality and Non-Discrimination

We are committed to providing equal opportunities to all individuals, regardless of their race, color, ethnicity, national origin, gender, age, disability, sexual orientation, religion, or any other protected characteristic. See our Diversity and Inclusion (DEIB) Policy.

Ethical Labor Practices

CatalystOne is committed to upholding the fundamental rights of all workers, both within our organisation and throughout our supply chain. We prohibit all forms of modern slavery, including forced labour, human trafficking, child labour, debt bondage, and forced or underage marriage. We also reject any form of workplace discrimination and commit to providing fair wages, reasonable working hours, and safe, inclusive working conditions. These standards apply equally to our employees and to our partners and suppliers. Our supplier due diligence and ethical risk assessments are conducted in line with our Supplier Policy, and we reserve the right to terminate relationships with any party found to be in violation of these principles.

Freedom of Association and Collective Bargaining

We recognize and will respect the rights of employees to join trade unions and engage in collective bargaining, as protected by applicable laws and regulations.

Data Privacy and Security

We are committed to protecting the privacy and security of personal data we collect and process, in accordance with applicable data protection laws and regulations, such as GDPR. We will handle data transparently and with the utmost respect for individuals' privacy rights. See our [CatalystOne - Security Trustcenter](#).

Responsible Use of Technology and AI

Technology is central to how CatalystOne operates and delivers value. As we adopt and develop digital tools, including AI-driven technologies, we have a shared responsibility to ensure they are used in an ethical and transparent manner. We expect employees to consider fairness, privacy, and security in all interactions involving technology, and to be mindful of how automated systems may influence decisions or outcomes. CatalystOne is committed to ensuring that digital tools are used in ways that respect individuals' rights and comply with applicable regulations, including the evolving framework established by the EU AI Act. Ethical behaviour extends to the digital environment, and we expect all employees to act with integrity when developing, applying, or making decisions based on technological solutions. See our [Acceptable use of AI in CatalystOne](#).

Ethical Engagement with Suppliers and Partners

Our relationships with suppliers and partners reflect not only our operational needs but also our values. Employees involved in supplier selection, management, or collaboration must uphold the principles outlined in our Supplier Policy and ensure that our business relationships are consistent with our expectations for responsible business conduct. This includes supporting ethical sourcing, promoting respect for human rights across the value chain, and ensuring that sustainability considerations form part of how we evaluate and work with external partners.

By engaging responsibly with our suppliers and partners, we protect CatalystOne's integrity and contribute to more ethical, transparent, and sustainable business practices across our ecosystem.

Training and Awareness

We will provide training and awareness programs to help employees and stakeholders understand and adhere to this Code of Conduct. Regular communication and education initiatives will reinforce our commitment to ethical behavior.

Consequences of Non-Compliance

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or contractual relationship. We expect all employees, contractors, and stakeholders to understand and comply with this Code.

This Code of Conduct has been approved by the Chief Executive Officer of CatalystOne Solutions and applies to all employees. The officially signed version of this document is maintained in CatalystOne's internal documentation system. This publicly available version is an identical copy provided for transparency and information purposes.
