



**INSPECTION  
SERVICES**

**ENVIRONMENTAL  
SERVICES**

**PIPELINE  
MANAGEMENT**

**INDUSTRIAL  
SERVICES**



# **Our Code of Conduct**

**Intero Integrity Services (Worldwide)**



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# Foreword From the CEO

Welcome to our Code of Conduct (the Code). At Intero, our mission is to help industry leaders optimize their assets' and installations' workable space. Using our insights, technologies, advanced equipment and data analytics, we enable clients to identify and extract maximum value from their installations.

For the Intero brand to have real meaning, how our people behave is critically important. For this purpose, we have adopted this Code of Conduct. The Code sets out the principles and standards, which, together with our values, must guide the way we work, our relationships with each other and our relationships with third parties.

By following the principles and standards laid down in the Code, you can protect Intero, and yourself, by ensuring you take the right actions when faced with difficult issues.

As CEO of Intero, I have overall responsibility for the implementation of the Code. Our Legal & Compliance Officer assists me with this project. Together, we will ensure that the Code is adopted and adhered to by all of Intero's employees and business partners. We have created a dedicated training program for this purpose.

Finally, I wish to introduce you to our whistleblowing platform, <https://report.whistleb.com/interointegrity>. Any improper conduct you see within the organization, whether large or small, current or historic, suspected or certain, can be reported through this secure third party platform. Reports can be submitted on an anonymous basis and each report will be handled with the utmost seriousness and diligence. I encourage you to use this platform: wherever issues occur, we should be reporting them and dealing with them promptly and effectively, in order to protect our people, our business and our brand.



Rienk de Vries, CEO



### Who Is the Code For?

This Code applies to every employee, director, and officer in every Intero company. It sets the boundaries within which you must operate every day, without exception.

Contract staff working for an Intero company must also follow the Code. Agents, contractors and consultants working on behalf or in the name of an Intero company are required to act consistently with the Code.

Intero will periodically offer training to employees regarding the Code. It is mandatory to complete these trainings.

### What Happens If I Violate the Code?

Violations of the Code, or other Intero policies, can result in disciplinary action or even dismissal. In some cases, Intero may report a violation to the relevant authorities, which could lead to legal action, fines, or imprisonment.

### What If I Have Questions or Concerns?

If you would like advice on any matter relating to the Code or wish to report a concern, please speak to your line manager, the Legal and Compliance Officer, or the HR manager.

Alternatively, you can report concerns through the whistleblowing platform, which can be accessed here: <https://report.whistleb.com/en/interointegrity>

The whistleblowing platform is available in each country where Intero has a presence. You can submit a report anonymously if you wish. You should not use the whistleblowing platform to report QHSE incidents – these should be reported through the existing QHSE procedure.

It is your duty to report any suspected violations of the Code. If you do nothing, you risk Intero's reputation and financial penalties that could affect Intero's business and work force.

Intero will not tolerate any form of retaliation directed against anyone who raises a concern in good faith about a possible violation of the Code.



# Quality, Health, Safety, and Environment

At Intero; Quality, Health, Safety, and Environment (QHSE) are key elements of our business success for both operational excellence and meeting our clients' expectations. Our reputation and safety standards are highly valued by our clients and are essential for the continuity and future of our company.

We always comply with applicable QHSE laws, regulations and policies, and respect customer requirements and specifications. We complete our work correctly at the first attempt and avoid causing any material damage.

We prevent incidents, injuries, and damage to the health and wellbeing of employees, contractors, bystanders, and other third parties. We consult and encourage employees and third parties to participate

in our risk assessments. We believe that together, we know more.

In our business, we prevent unnecessary impact on the environment (including climate change).

We have a zero-tolerance policy for alcohol and drugs during work hours, whether working in the office, at home, or on site.

You must report risks, near misses, damages, as well as incidents and/or accidents through the Intero issue form, which is available on SharePoint.

Furthermore, you are expected to adhere to Intero's Ten Golden Rules.



# Corporate Social Responsibility

We create social value with integrity by continuously finding a healthy balance in investing in the continuity of our organization, company processes, the people who work for or on behalf of us, staff members, and the environment. We comply with laws and regulations and (inter)national standards in terms of working conditions, land rights, human rights (including the prohibition of forced and child labor), the right to a living wage, and freedom of association.

# Equal Opportunity

We offer equal opportunities to everyone, without being influenced by personal feelings, prejudices, and preferences.

- When making employment decisions including hiring, evaluation, promotion, training, development, discipline, compensation, and termination; you must base them solely on objective factors including merit, qualifications, performance, and business considerations.
- You should understand the value of diversity and must not discriminate in any way based on race, color, religion, age, gender, sexual orientation, gender identity, marital status, disability, ethnic origin, or nationality.

# Harassment

Intero does not tolerate any form of harassment in the workspace.

- You must treat others with respect at all times.
- You must not physically or verbally intimidate or humiliate others.
- You must not make inappropriate jokes or comments.
- You must not display offensive or disrespectful material.

Challenge someone if you find their behavior hostile, intimidating, humiliating, or disrespectful; or report the issue to your line manager or via the whistleblowing platform.

# Use of IT and Electronic Communications

Intero supplies you with IT and electronic resources so that you can conduct your work in a secure and compliant manner. You must use these resources responsibly.

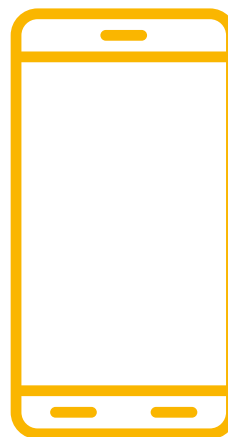
- You must not use personal email accounts for work communications.
- You must not share your login details with others.
- You must not modify or disable security or other configuration settings downloaded by Intero to your own IT equipment.
- You must keep your personal use of Intero IT and electronic communications, including social media use, occasional and brief and not use the Intero name or brand in personal emails.
- You must not access, store, send or post pornography or other indecent or offensive material when using Intero IT and communication facilities, nor must you connect to online gambling sites or conduct unlawful activities.
- You must not store or transmit image or (streaming) media files or otherwise generate high network traffic or data storage costs due to personal use.
- You must not conduct your personal business activities using Intero IT or communication resources, or support others to do so.



# Protection of Assets

We expect everyone to take good care of our assets, including our vehicles, project equipment, office equipment, IT hardware and software.

- You are personally responsible for safeguarding and using Intero assets appropriately.
- You must not commit; and you must protect Intero against; waste, loss, damage, abuse, fraud, theft, misappropriation, infringements, and other forms of misuse.
- You must protect company property that has been entrusted to you and do your best to protect shared assets against loss or misuse. Be alert to the risk of theft.
- You must not unlawfully conceal, alter, or destroy documents.
- You must only use a corporate credit card for reasonable and approved business expenses.



## Anti-Bribery and Corruption

Intero has a zero tolerance policy towards bribery and corruption. We never pay or accept bribes or facilitation payments, whether to government officials or private persons. Even unsubstantiated claims of bribery and corruption may damage Intero's reputation.

- You must not offer, pay, make, request, or accept a personal payment, gift, or favor in return for favorable treatment or to gain a business advantage. You must not allow anybody else, such as an agent, subcontractor, or consultant, to do so on your behalf.
- You must not make facilitation payments, whatever the amount. If a facilitation payment has been requested or made, you must report it immediately to your line manager as well as to the Legal and Compliance Officer.

## Gifts and Hospitality

We discourage our employees from accepting gifts and hospitality from business partners or to offer gifts and hospitality to business partners, especially those you would not be comfortable telling your manager or colleagues about.

In particular, you must not offer, give, request, or accept:

- Cash, cash equivalents, vehicles, personal services, or loans in connection with Intero business;
- Gifts and hospitality to any government official;
- Gifts and hospitality during periods when important business decisions are being made;
- Gifts and hospitality that exceed a value of €100 per person (or equivalent in foreign currency).

Any payments made for gifts and hospitality should be documented with proper receipts and details of the employees and business partners involved.

## Hiring Agents and Other Intermediaries

We only work with trusted agents and other business partners, on professional terms.

It is not permitted to hire a business partner (such as an agent, distributor, reseller, consultant, adviser, or joint venture partner) without that business partner first undergoing pre-retention screening by the Legal and Compliance Officer.

All relationships with business partners should be supported by written contracts containing appropriate compliance provisions. Business partners should agree to act consistently with the Code by completing the Ethical Commitment contained in chapter 6 of the Code.



### Political Contributions

You must not use Intero funds or resources, whether directly or indirectly, to help fund political campaigns, political parties, political candidates, or anyone associated with them.

### Anti-Money Laundering

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities. All companies are at risk of being exploited in this way – and we must be on guard to help protect our reputation and ensure we comply with the law.

- Familiarize yourself with your customers and business partners, and how they operate.
- Understand the business rationale for each service that Intero provides to your customers and each payment that Intero makes to your business partners.
- Be alert to cash payments, unusual requests, or a sudden change in business practice.

### No Uncompetitive Behavior

You must follow the principle that all decisions on Intero's pricing, services, customers and markets are made by Intero alone. Non-compliance with competition law puts Intero's business at risk and may cause reputational damage, large financial penalties, and criminal sanctions for Intero and for the responsible individual.

- You must not agree with competitors, even informally, to fix price or any element of price, such as discounts, surcharges, or credit terms.
- You must not agree with competitors to divide up particular customers, accounts, or markets.
- You must not rig bids or tenders or participate in any bid or tender you know or suspect is rigged.
- You must not agree with others to boycott any customer or supplier, except in connection with internationally imposed government sanctions.
- You must not attempt to set a minimum or any resale price for an independent distributor or reseller.
- You must not share or receive competitively sensitive information without a lawful reason.
- You must not discuss with competitors any matter on which competitors are not legally permitted to agree.
- You must leave industry meetings or other events if competitively sensitive issues arise. Ensure your departure is noted and immediately report the matter to the Legal and Compliance Officer.

## Conflicts of Interest

Conflicts of interest may arise when your personal relationships, participation in external activities or an interest in another venture, could influence or be perceived by others to influence your business decisions for Intero. An actual, potential, or perceived conflict of interest may jeopardize the company's reputation as well as your own, and should be avoided if possible.

- You must not let any decisions you make at Intero be influenced by personal considerations such as relationships or outside interests of yourself, family, or friends.
- If you have an actual, potential, or perceived conflict of interest, you must protect yourself from any suspicion of misconduct by being transparent and notifying it to the Legal and Compliance Officer, whether or not you think it will actually influence your decision.
- You must withdraw from decision-making that creates an actual, potential, or perceived conflict of interest.

Provided that no actual, potential, or perceived conflict of interest would result, you may acquire interests in other businesses and perform external professional activities in your own time. You are also entitled to be active in your own time in community, government, educational, and other non-profit organizations. However, in any such case, you must comply with all relevant laws, regulations and Intero policies. If there is any doubt, you must raise your concern with the Legal and Compliance Officer before you start a new activity.

## Trade Restrictions and Sanctions

We must comply with all applicable national and international trade compliance regulations, including import and export controls and sanctions regulations. Consequently, if you are likely to enter into a new transaction (or negotiation) which you believe may be subject to a trade restriction, or you suspect that an existing arrangement may have become subject to a new trade restriction, you should consult with the Legal and Compliance Officer immediately.

### Data Privacy

At Intero, we respect the privacy rights of our staff, customers, suppliers, and business partners. We are committed to managing personal data in a professional, lawful, and ethical way.

- You must identify the privacy risks before collecting, using, retaining, or disclosing personal data, such as in a new IT system, project, or marketing initiative.
- You must only process personal data for specific, defined, legitimate purposes.
- When you process or share individuals' personal data, you must always inform them. In some cases, you will need to get their prior consent.
- You must always protect personal data if it is shared with a third party. If you are not sure whether you need consent or how to protect personal data when sharing with a third party, always seek advice from the Legal and Compliance Officer.
- You must ensure that personal data in your possession is kept up to date and disposed of when no longer required.

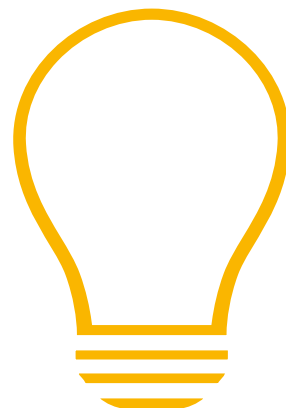
The Intero Privacy Policy and related Privacy Guidelines contain further guidance on dealing with personal data. They are available on Sharepoint.



### Intellectual Property

We need to protect our brand, ideas, and technology; as well as our trademarks, patents, knowhow, and trade secrets; and put them to optimal use for Intero. At the same time, we need to respect, and avoid infringing, the intellectual property of others.

- You must use Intero's brands and trademarks appropriately.
- You must report your innovations and inventions to the Legal and Compliance Officer.
- You must classify and store Intero business and technical information appropriately, and with appropriate access controls.
- If you are responsible for introducing new brands in a market or new proprietary technology, you must first consult the Legal and Compliance Officer to mitigate the risk of Intero infringing IP rights of others.
- If you notice that a third party is infringing or misusing Intero IP rights, for example by passing on documents containing confidential information, it is your duty to report this.



### Confidential Information

In our work, we use and exchange confidential information on a daily basis. We need to ensure we use this information responsibly and protect this information, both our own and that of others. Examples of confidential information include customer and supplier files; commercial agreements and proposals; technical drawings and specifications; working methods and industrial processes; inspection data reports; internal decision-making, plans and budgets; non-published results, remuneration information, and sales forecasts; production costs, capacities, qualities; research programs; and acquisition or divestment projects.

- You must not disclose Intero's confidential information outside Intero without permission or an appropriate written agreement, and you must make a record of the information provided under the agreement.
- You must not accept confidential information from a third party unless you have permission to do so and you have agreed to receive it under a prior written agreement. You must not misuse confidential information of a third party.
- You must store confidential information securely, whether digitally or in hard copy.
- Any loss of confidential information should be reported to the Legal and Compliance Officer immediately.

### Business Communications

Be aware that everything we write or say reflects on Intero's reputation. Whichever media you use, either within Intero or externally, we expect you to adhere to the following rules on business communications.

- You must not disclose information about Intero's business activities unless you are authorized to do so. That applies to the things you say, as well as anything in writing.
- You must not engage with the media on behalf of Intero without permission from the Marketing and Communication Manager.
- You must only commit an Intero company if you have corporate authority to do so and you must not issue orders or make decisions for companies that you do not work for.
- You must not engage in casual conversation on sensitive or confidential matters or send communications containing material that is racist, sexist, offensive, defamatory, fraudulent, or otherwise inappropriate.
- You must not use personal social media accounts for disclosing confidential business information or other business purposes. If you use personal social media for personal purposes to discuss industry-related topics, or to endorse or provide testimonial of Intero and its services, you must disclose that the views expressed are your own and do not necessarily reflect those of Intero.



# Ethical Commitment of Employees

I confirm that I have read and understood the Code of Conduct and I agree to comply with the principles and standards set out therein.

**Signature:**

\_\_\_\_\_

**Name:**

\_\_\_\_\_

**Position:**

\_\_\_\_\_

**Date:**

\_\_\_\_\_

# Ethical Commitment of Business Partners

On behalf of the undersigned company (the **Business Partner**), I confirm that I have read and understood the Code of Conduct and agree to comply with the principles and standards set out therein.

In the event of a breach of the Code of Conduct, the Business Partner will notify such breach to Intero forthwith and take the necessary remedial actions to resolve that breach.

The Business Partner acknowledges that Intero reserves the right to terminate the relationship in case of any material breach of this Code of Conduct.

### Signed, on behalf of:

Company:

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### By:

Signature:

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Name:

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Position:

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Date:

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# **Intero Integrity Services**

info@intero-integrity.com

Steenoven 2-6  
4196 HG Tricht  
The Netherlands  
+31 (0)345 228 600



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