



Code of Conduct

January 2026

Welcome to Intero

For industry leaders across the globe, we are their trusted partner for inspecting and maintaining their assets and installations. By combining our insights, cutting-edge technologies, advanced equipment, and powerful data analytics, we enable our customers to identify vulnerabilities and capture the full value of their assets.

The quality of our services around the world speaks for itself. But true quality is also shown in how we do business, how we treat one another, and how we make decisions with integrity. Our Code of Conduct is our ethical and legal compass, guiding how we work, collaborate, and make choices that reflect who we are.

In this renewed Code of Conduct, we reaffirm Intero's core values - the foundation of our culture and success. Together, we ensure these values come to life in everything we do.

Please take time to read this document. If you have any questions, please raise them. Intero will periodically offer training to employees regarding the Code of Conduct. It is mandatory to complete these trainings.

This Code of Conduct applies to everyone working for Intero, whether as an employee, director, consultant, temporary or permanent staff member, third party representative or in any other capacity. Agents, contractors and consultants working on behalf or in the name of an Intero company are required to act consistently with the Code of Conduct. The Code of Conduct is readily available on the Intero website and can be accessed [here](#).

Violations of the Code of Conduct, 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.

Rienk de Vries
CEO Intero Integrity Services



Our values

At Intero, our values shape every decision, interaction, and action we take. They guide how we show up for one another, for our customers, and for the world around us. We call them **EPIC**, because they define what it means to be part of Intero - every day, in everything we do.

Living our values is not optional; it's an expectation. Every employee, leader, and partner is responsible for acting in line with these principles. When behavior falls short, we will address it respectfully but firmly, ensuring accountability and alignment with what Intero stands for.



Strive for Excellence

We prioritize health and safety by consistently following and promoting best practices. We actively support others in creating and maintaining a safe, healthy environment, and we take immediate, decisive action to stop or intervene whenever our own safety - or that of others - is at risk, in order to prevent harm. We regularly reflect on our performance and apply what we learn to improve outcomes and efficiency. We take full ownership of our work and consistently deliver high-quality results.



Put People First

We value and welcome diverse viewpoints, fostering an inclusive atmosphere where every voice is heard. We collaborate effectively, contribute to shared goals, and help build a supportive, cohesive workplace. We recognize the efforts of others and inspire one another to achieve our best.



Act with Integrity

We communicate openly and transparently; we consistently tell the truth, even when it's uncomfortable. We take accountability for our actions and results; we acknowledge our mistakes, correct them proactively, and hold others accountable for their actions and outcomes as well. We act ethically and integrate sustainability into decisions that affect people, data, and the environment.



Champion the Customer

We understand our customers' needs and challenges and deliver effective solutions that balance value and cost. We build trust by listening actively and delivering on our promises. We address customer issues efficiently and use the insights gained to prevent similar problems in the future, while implementing effective, long-lasting solutions.

How we work

At Intero, we strive to create a place where ethical choices and the right decisions guide our work - and where every voice is valued, respected, and heard.



Quality, Health and Safety

Quality, Health, Safety, and Environment (QHSE) are at the heart of our services, and we comply with all applicable health and safety laws, regulations and customer policies. They are the key to our operational excellence, trust with our customers, and safeguard our employees, contractors, bystanders and third parties from harm. Nothing is so important or urgent that it cannot be done safely.

We take pride in delivering work right the first time - meeting every requirement and customer specification without compromise.

Our commitment to the environment is just as strong: we work to minimize impact, prevent nuisance, and see legal requirements only as the baseline, never the ceiling.

You must always follow Intero's QHSE rules and policies and uphold its five core safety values:

- 1. Take responsibility for your own safety.**
- 2. Speak up about unsafe situations.**
- 3. Act or stop work if it is unsafe.**
- 4. Be open to feedback on your safety behavior from anyone.**
- 5. Report all incidents, near-misses, and hazards through the Intero issue form, available on SharePoint.**

Respect, dignity and mutual understanding

We believe in equal opportunity - both in recruitment and throughout employment - and we are committed to helping you grow by developing your talents, skills, and capabilities. In return, we ask every colleague to foster a culture of respect, dignity, and mutual understanding toward one another.

Respecting human rights

We respect human rights with a culture focused on fair treatment for all. We do not allow modern slavery, forced labor or human trafficking anywhere in our business.

We say no to...

Alcohol and drugs

Because focus and responsibility are essential to safety in our work, we maintain a zero-tolerance policy for alcohol and drugs - whether in the office or on site.

Harassment, bullying or discrimination

Respect encourages respect in return, creating an inclusive, supportive, and collaborative workplace. Respect reduces conflict, improves morale, and enables everyone to do their best. Because people have different backgrounds and perspectives, they may perceive behavior differently. When we look at possible harassment, bullying, or discrimination, we focus on the impact of the behavior - not the intent - and if it would be seen as unacceptable by normal standards.

Bystander Effect

The bystander effect happens when people witness inappropriate or unsafe behavior but stay silent, assuming others will act. At Intero, everyone is responsible for speaking up or reporting concerns. Staying silent allows harm to continue; taking action helps maintain a safe and respectful environment.

⊗ Harassment

Harassment is any unwanted physical, verbal, or non-verbal behavior that makes someone feel intimidated, humiliated, offended, or unsafe. It can be a single incident or repeated actions and often targets personal characteristics like age, disability, gender, race, religion, or sexual orientation.

⊗ Bullying

Bullying is offensive, intimidating, or insulting behavior that misuses power to humiliate, undermine, or harm someone. It is closely related to harassment and is often deliberate.

⊗ Discrimination

Discrimination occurs when individuals or groups are treated less favorably because of characteristics such as race, gender, age, disability, religion, sexual orientation, or other factors unrelated to their ability or potential.

If you find someone's behavior hostile, intimidating, humiliating or disrespectful, raise and discuss it with the person involved to let them know that you find their behavior unwelcome or upsetting. If that does not work or is not possible, please speak with your line manager or HR. If the situation cannot be appropriately dealt with locally or you don't feel safe, please raise your concerns via the Intero Speak Up! Hotline at speakup.intero-integrity.com. Please also see page 12 for more details.



How we do business

We act fairly, responsibly, and with integrity toward all our stakeholders - shareholders, investors, customers, employees, suppliers, partners, competitors, and governments.

At Intero, we are committed to doing business the right way: ethically, legally, and professionally. We comply with local laws, and with transparency and responsibility in everything we do. When adapting to local cultural differences, we comply with the law and act responsibly.

If you are ever unsure about something, ask yourself:

- Does it comply with our Code of Conduct?
- Is it legal?
- Is it safe?
- How would I feel when reading about it in the newspaper or see it on the news?
- Can I justify it to my manager, customer or colleagues?

Please remember, non-compliance with laws puts Intero at risk and may cause reputational damage, large financial penalties and even criminal sanctions for Intero and individuals. If there is any doubt, you must raise your concern with the Head of Legal and Compliance, HR or your manager.

Bribery and Corruption

Intero has a zero-tolerance policy towards bribery and corruption. We do not offer, give, solicit, or accept bribes or kickbacks, either in cash or in the form of any other thing or service of value, whether to government officials or private persons. Do not let anyone - agent, subcontractor, or consultant - pay a bribe on Intero behalf. A bribe by a third party acting for Intero could be treated as a bribe by Intero. If it's illegal for us to do, it's illegal for someone else to do it for us.

Intero also doesn't allow what's known as 'speed', 'grease' or 'facilitating' payments to government officials to expedite or to secure the performance of a routing governmental action. If a facilitation payment has been requested or made, you must report it immediately to your manager as well as to the Head of Legal and Compliance. Most countries have anti-bribery and corruption laws. Some regulations apply globally and can lead to severe penalties for both individuals and companies. Intero works globally, including in regions with higher risks. Wherever you work, always follow local anti-bribery and corruption laws.

All Intero companies must keep accurate financial records and implement internal controls that justify payments to third parties. All accounts must be strictly accurate, and no off-book records may be used to facilitate or conceal improper payments.

Hiring agents and other intermediaries

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

Before entering into a contract with a business partner, including an agent, distributor, reseller, consultant, adviser or joint venture partner, that business partner must first undergo pre-retention screening by the Head of Legal and Compliance.

All business partner relationships must have written contracts with appropriate compliance provisions. Business partners must also commit to our Code of Conduct by completing the Ethical Commitment included at the end of the Code of Conduct.

Conflicts of interest

Conflicts of interest can occur when personal interests or activities could influence your work or create bias.

Conflicts of interest can happen in many different situations so stay alert and make decisions in the best interests of Intero. Managers should also watch for potential conflicts in their teams. If you believe a conflict exists, be transparent and obtain approval from your Country Manager (or your own manager if you are a country manager), and step back from any related decision-making.

When can conflict of interest occur?



If you have a financial advantage in transactions involving Intero.



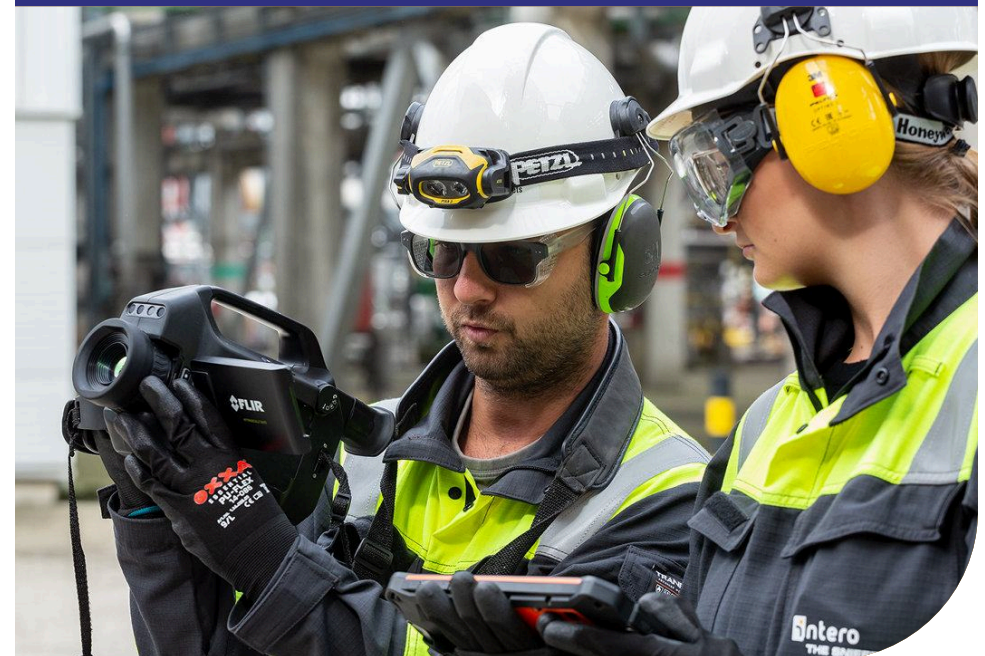
If you carry on a business that is similar to Intero's business.



If you work for one of our business partners or competitors or have a financial interest in them.



If you hold shares or other financial stakes in a company that does business with Intero.



Gifts and hospitality

Gifts and hospitality must never be requested or accepted if they could appear to influence someone improperly. If you are unsure, think about how it may look to others – could it raise questions about your integrity or theirs?

Anyone giving or receiving gifts or hospitality must ensure they are appropriate and reasonable. Consider the type, value, cultural norms, the recipient's role and influence, timing and frequency, and our policies and local laws. You may 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 must be documented with proper receipts and details of the employees and business partners involved.

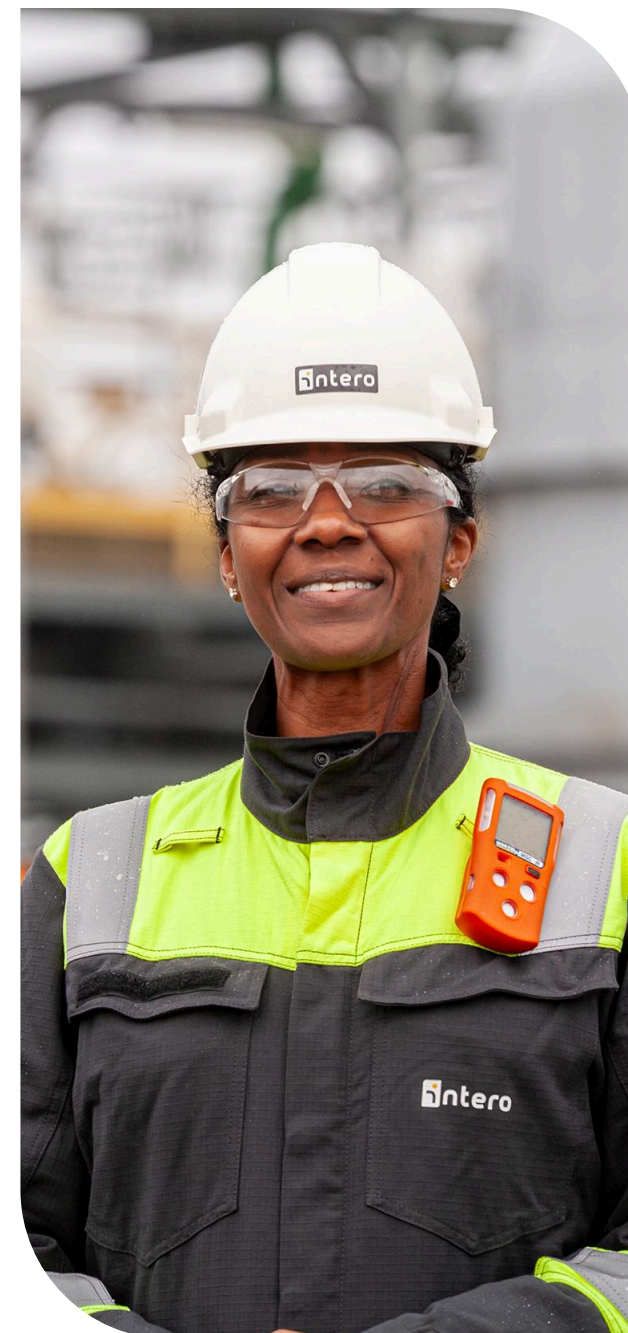
Political contributions

Do 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 happens when profits from crime are disguised as legitimate business transactions, or when legal funds are used to support crime. Intero, strictly forbids any involvement in this. If you notice anything suspicious, report it to your local Finance Manager or the Head of Legal and Compliance. To help prevent Anti-Money Laundering (AML) issues, please:

- 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 payments, or a sudden change in business practice.





Fair Competition

We take all decisions on pricing, services, customers and markets independently. We never enter into any agreement - written or informal - that restricts competition, such as price fixing, bid rigging, or market sharing. We therefore:

- Do not agree with competitors on prices, discounts, surcharges or credit terms.
- Do not divide customers, accounts or markets with customers.
- Do not rig bids or tenders or take part in any bid or tender you know or suspect is rigged.
- Do not join others in boycotting any customers or suppliers (except those under government sanctions).
- Do not set minimum or resale prices for independent distributors or resellers.
- Do not share or receive competitively sensitive information without a legal basis.
- Do not discuss topics with competitors that the law prohibits.

If competitively sensitive topics come up at an industry meeting or event, leave immediately, make sure your departure is noted, and report it to the Head of Legal and Compliance.

Trade sanctions

We must comply with all applicable national and international trade compliance regulations, including import and export controls and sanctions.

If you plan to enter into a new transaction (or even negotiation) that may be affected by trade restrictions - or suspect an existing arrangement is now restricted - contact the Head of Legal and Compliance immediately.

Screening

High-risk third parties as indicated in our screening guidelines need to be screened before undertaking any transactions with them.

Restricted countries

Due to the business and compliance risks involved, we do not engage in transactions in certain countries. These are Belarus, Cuba, Iran, North Korea, Ukraine, Russia, Syria, and Venezuela.

Please also see the screening guidelines available on SharePoint and are regularly updated.

How we protect our assets, information and communication

Protection of assets

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

- Protect Intero against waste, loss, damage, abuse, fraud, theft, misuse, or infringement.
- Don't waste, damage, steal, misuse, or allow others to misuse company resources.
- Protect both your assigned property and shared assets, and watch out for theft.
- Never hide, change, or destroy documents illegally.
- Use your company credit card only for reasonable, approved business expenses.

Use of IT and electronic communications

Intero provides IT systems and communication tools to help you work securely and in compliance with our standards. These resources must be used responsibly and primarily for business purposes.

- Do not use personal email accounts for work.
- Keep your login details private - never share them.
- Do not alter or disable security or configuration settings applied by Intero.
- Personal use of IT systems, including social media, must be limited, occasional, and never use the Intero name or brand in personal emails.
- Do not access, share, or post indecent, offensive, unlawful, or gambling-related material.
- Avoid storing or transmitting large media files or otherwise creating high data traffic through personal use.
- Do not use Intero systems for personal business or allow others to do so.





Data privacy

At Intero, we collect, use, and process personal and customer data responsibly and in line with the laws of the countries where we operate. We respect the privacy of our staff, customers, suppliers and other stakeholders and manage personal data lawfully and ethically.

When only use personal data for legitimate business reasons and only as needed to do our job. Whenever possible, we anonymize personal data to reduce risk.

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

Intellectual property

We must safeguard Intero's brand, ideas, technology, and intellectual property (such as trademarks, patents, know-how, and trade secrets) and use them to benefit the company. At the same time, we must respect the rights of others and avoid infringing on their IP.

- Use Intero's brands and trademarks correctly and responsibly.
- Report any innovations or inventions you create to the Head of Legal and Compliance.
- Classify and store Intero's business and technical information securely, with proper access controls.
- Consult the Head of Legal and Compliance before launching new brands or technologies to ensure Intero does not infringe others' rights.
- Report any misuse or infringement of Intero's IP by third parties, such as unauthorized sharing of confidential information.

Artificial Intelligence (AI)

Intero values Artificial Intelligence as a tool to improve efficiency, safety, and decision-making. Use AI responsibly and ethically and only for approved business purposes. Protect confidential information, and follow privacy and security laws. Do not use AI to create misleading, harmful, or discriminatory content, or to replace human judgment. Always apply critical thinking, check AI outputs, and seek guidance if you are unsure. More information can be found in the Intero IT Policies & Procedures on SharePoint.

Confidential information

We work with confidential information every day and must use and protect it responsibly - both Intero's and that of others. This includes items like customer and supplier data, contracts, 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. Do not share Intero's confidential information externally without approval and a written agreement, do not accept or misuse a third party's confidential information without permission and proper agreements, and always store confidential information securely.

Report loss of confidential information to the Head of Legal and Compliance immediately.

Communication

Everything we write or say - internally or externally - affects Intero's reputation. All forms of communication must be professional, accurate, and respectful.



Do's and don'ts when communicating

- Do not disclose any information about Intero's business unless you are explicitly authorized to do so. This applies to both written and spoken communication, and explicitly prohibits sending confidential, proprietary, or otherwise sensitive business information to personal email accounts or any other non-authorized external locations. Do not engage with the media on behalf of Intero without approval from the Marketing and Communication Manager.
- Only commit Intero to agreements or decisions if you have the proper authority. Never issue instructions for Intero companies you don't work for.
- Avoid casual discussions about sensitive or confidential matters, and never send or post material that is offensive, discriminatory, defamatory, fraudulent, or otherwise inappropriate.
- Do not use personal social media accounts to share confidential business information or conduct business. If you discuss industry topics or mention Intero on personal accounts, clearly state that the views are your own and not those of Intero.

How to act when you have concerns

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

Alternatively, you can report concerns through the Intero Speak Up! Hotline which can be accessed here: speakup.intero-integrity.com. The Speakup! Hotline is available in each country where Intero has a presence. You may choose to report anonymously or give your name. Please provide as much detail as possible to help the investigation. All reports are handled confidentially, and if made in good faith, your identity will be protected, and you will be safeguarded against retaliation.

Do not use the Intero SpeakUp! Hotline to report QHSE incidents – these must be reported through the QHSE procedure.

You must report any suspected violations of the Code of Conduct. Failing to do so puts Intero at risk, including damage to our reputation and potential penalties.

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



