

## Introduction

This Code of Conduct specifies and helps the continued implementation of PGS Group's corporate principles by establishing specific non-negotiable minimum standards of behaviour. These principles are based on the Organization for Economic Cooperation and Development ("OECD") Guidelines for Multinational Enterprises, Universal Declaration of Human Rights, and the fundamental conventions of the International Labor Organization ("ILO"). This Code is not meant to cover all possible situations that may occur. It is set up to provide a frame of reference by which all activities can be measured.

The following basic principles should always guide employees:

- (1) Avoid any conduct that could damage or risk PGS Group or its reputation;
- (2) Act legally and honestly;
- (3) Place PGS Group's interests ahead of personal interests.

## Scope

In this Code, "we" and "us" refers to the own workforce as defined by the European Sustainability Reporting Standards ("ESRS"), the delegated act of the Corporate Sustainability Reporting Directive ("CSRD"). This includes all individuals in an employment relationship with the company, self-employed contractors supplying labor, and agency workers provided by firms primarily engaged in employment activities.

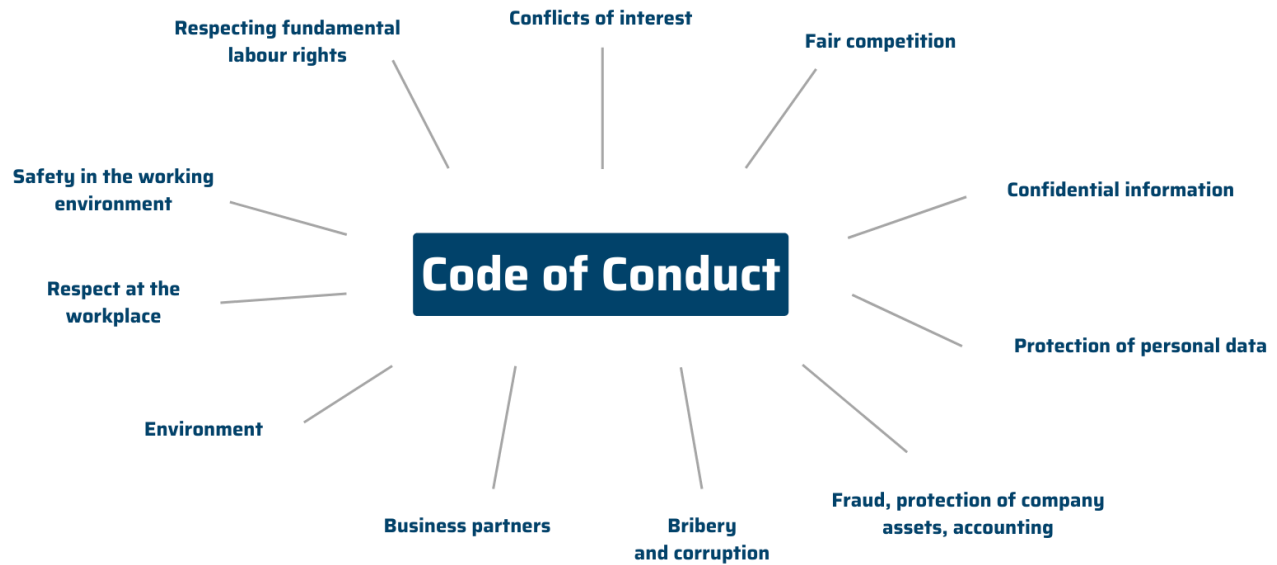
In addition, in this Code "the organization" refers to PGS Group and all its entities.

## Compliance

Non-compliance with this Code may lead to disciplinary actions, potential dismissal, and possibly legal proceedings or criminal sanctions. This applies to all individuals within this comprehensive definition of own workforce.

PGS Group and its employees are subject to applicable local laws, rules, and regulations. Compliance should never be compromised. However, the application of laws and regulations can be complex and fact-dependent. In case there are questions about the applicability or interpretation, you should contact your direct supervisor or the Corporate Social Responsibility ("CSR") Manager.

PGS Group reserves the right to modify and update this document as necessary. The most recent version is available on Sharepoint or can be obtained from the CSR, HR or Legal department.



## 1. Conflict of interest

A conflict of interest occurs when the personal interests of employees or the interests of a third party interfere with the interests of PGS Group.

We should avoid conflicts of interest whenever possible. If such a situation occurs, we should contact our direct supervisor or the Corporate Social Responsibility Manager.

## 2. Anti-competitive practices

PGS Group competes fairly and will do so in full compliance with all applicable antitrust, competition, and fair-trading laws. Therefore, at a minimum, we must adhere to the following rules: (1) Commercial policies and prices will be set independently and are never negotiated with competitors or other non-related parties; (2) Customers, territories, or product markets are always the result of fair competition; (3) Customers and suppliers are treated fairly.

All of us, but especially those who are involved in sales, purchasing, and marketing or who have regular contact with competitors, have a responsibility to ensure that we are familiar with applicable competition laws. When in doubt, we should contact our direct supervisor or the Corporate Social Responsibility Manager.

### 3. Confidential information

Confidential information consists of any information that is not or not yet made public. It includes, but is not limited to, trade secrets, business plans, consumer insights, engineering and manufacturing ideas, product design, databases, salary information, and financial data. Unless required by law or authorized by management, we should not disclose confidential information. We should make our best efforts to avoid unintentional disclosure by taking special care when storing or transmitting confidential information.

### 4. Protection of personal data

PGS Group respects the privacy rights of employees, customers, suppliers and other business partners and therefore we treat personal data confidentially in compliance with the General Data Protection Regulation or other relevant applicable legislation.

We may only collect, process, transmit and use personal data insofar as reasonably required for our effective business operations. We respect the confidential nature of any personal data and we take responsibility to keep such data accurate, complete, relevant and secure.

### 5. Fraud, protection of company assets, accounting

The financial records of PGS Group are the basis for managing business and fulfilling obligations to various stakeholders. Therefore, all financial records must be accurate and in line with accounting standards.

We must never engage in fraudulent or any other dishonest behaviour regarding the property or tangible and intangible assets or the financial reporting and accounting of the organization.

In addition, we must comply with the following rules at a minimum: (1) Safeguard and make only proper and efficient use of PGS Group's property; (2) Protect PGS Group's property from loss, damage, misuse, theft, fraud, embezzlement, and destruction.

### 6. Bribery and corruption (UNGC Principle\* 10)

We must never offer or promise any personal or improper financial or other benefits to obtain or retain business or other benefits from a third party. Nor must we accept such benefits in return for any preferential treatment from a third party.

\* United Global Compact Principle

Additionally, we should not participate in or endorse any corrupt practices, including money laundering, offering or accepting bribes, excessive gifts or hospitality, or facilitation payments, directly or indirectly. Especially in situations where there is interaction with government officials, we must be even more careful. Most of these officials are not allowed to accept any gift or entertainment at all. In all cases we only offer and accept gifts or entertainment in conformity with the law. When in doubt, we should consult our direct supervisor or Corporate Social Responsibility Manager.

### 7. Business partners

PGS Group's business partners play an important role in helping the organization conduct business globally. Our group values strong relationships with its business partners, based on trust and mutual benefit. PGS Group looks for and supports business partners who share its principles. It ensures that its business partners act in compliance with its principles, by evaluating and approving business partners in accordance with our Supplier Code of Conduct.

We also implement policies and processes to ensure sustainable sourcing practices. For further information about our values and control regarding our business partners, refer to:

- PGS Procurement Policy
- PGS Supplier Approval & Onboarding policy

### 8. Environment (UNGC Principles 7, 8, 9)

We support environmental preservation, take action to promote greater environmental responsibility, and encourage the development and dissemination of environmentally technologies. We strive to minimize our negative impacts on the environment, especially on climate and biodiversity. We use natural resources sustainably. We implement relevant measures and actively apply improved production processes and technologies to reduce environmental effects. We engage in research and development of more eco-friendly products or services. We share best practices within our industry and take measures to reduce our environmental footprint throughout our entire supply chain.

This commitment also encompasses strict adherence to environmental compliance requirements to prevent incidents such as hazardous waste spills, discharges, or other environmental concerns, ensuring non-compliance is addressed with the highest priority to mitigate negative environmental impacts.

### **9. Respect at the workplace (UNGC Principle 6)**

PGS Group is committed to creating a workplace that is free from discrimination and harassment. Our organization respects the dignity, privacy, and personal rights of every employee, and it does not tolerate any form of discriminatory behavior or harassment. This includes verbal or physical harassment based on origin, nationality, religion, race, gender, age, sexual orientation, or any other reason.

Our organization believes that every employee has the right to work in an environment that is free from offensive, abusive, or unwanted behavior. Such behavior can violate the personal dignity of the victim and create an intimidating, hostile, or humiliating environment. The organization takes these issues very seriously, and encourages its employees who feel that their working environment does not comply with these principles to raise their concerns.

PGS Group is committed to ensuring that the workplace is a safe and respectful environment for all its employees. Discriminatory behavior or harassment will not be tolerated, and appropriate action will be taken to address any such behavior.

### **10. Safety in the working environment**

PGS Group is committed to ensuring a safe and healthy work environment. We must follow all safety rules and practices, take necessary steps to protect ourselves and others, and report all accidents, injuries, and unsafe practices or conditions immediately to our direct supervisor, Plant Manager or QSE (Quality, Safety & Environment) coordinator or manager. To increase workplace security, we should be familiar with and follow any work safety information and provided training.

For further information, refer to:

- Quality Safety Environment (QSE) Policy
- Occupational Health and Safety Charter
- The Golden Rules - Safety at the Workplace

### **11. Respecting Fundamental Labor Rights (UNGC Principles 1, 2, 3, 4, 5)**

PGS Group respects and supports internationally recognized human rights for its employees, as outlined in the fundamental ILO Conventions. The organization is committed to fostering a socially responsible and fair work environment.

### Forced labor, slavery and child labor

We do not accept any form of forced labor or slavery and we do not accept illegal labor in the production of goods or services for PGS Group.

We unequivocally reject any form of forced labor or slavery and do not tolerate illegal labor in the production of goods or services. We also prohibit any form of child labor in our business activities. We strictly comply with the local laws on minimum age and other working conditions in our entities around the world. The minimum age for employment at PGS Group is in accordance with the ILO conventions or, if higher, with the age established in the local legislation.

If one of these practices is detected, we will act immediately to remove identified victims from labor, provide necessary support, engage with suppliers to prevent future occurrences, possibly terminating the relationship, report the incident to local authorities.

PGS Group urges everyone to report any suspected forced labor, slavery and child labor instances, which will be investigated thoroughly.

### Collective bargaining

We all have the right to form or join associations of our own choosing, and to bargain collectively. Our organization does not accept disciplinary or discriminatory actions from the employer against employees who choose to peacefully and lawfully organize or join an association.

## **12. Whistleblower Policy**

A whistleblower is any employee who, in good faith, reports an activity believed to be illegal, unethical, or not in line with this Code of Conduct. In compliance with international best practices and applicable legislation in the countries where PGS Group operates, we are committed to protecting whistleblowers. Our organization ensures that whistleblowers will not face retaliation, discrimination, or disciplinary action for reports made in good faith.

For further information, refer to:

- Whistleblower Policy

### Contact information

Employees who have questions about the applicability or interpretation of the Code of Conduct should contact the CSR department by e-mail ([csr@pgsgroup.com](mailto:csr@pgsgroup.com)).

### Code of Conduct accepted by:

Employee name:

Date and signature:

### Version History

Version	Modification	Description
17/02/2019	First version	First version of the Code of Conduct approved by Management level and Employee Representative.
07/04/2021	Total review of the Code of Conduct	Total review of the Code disseminated to Chief Support Officer.
19/05/2021	<ul style="list-style-type: none"> <li>- Contact information</li> <li>- Governance</li> </ul>	Adjustments feedback Chief Support Officer. Version approved by Management level and Employee Representative.
15/07/2021	<ul style="list-style-type: none"> <li>- High Labour Standards</li> </ul>	Addition of the HR department.
18/04/2023	<ul style="list-style-type: none"> <li>- Introduction</li> <li>- Fair competition</li> <li>- Protection of personal data</li> <li>- Business partners</li> <li>- Respecting fundamental labour rights</li> <li>- Whistleblower policy</li> </ul>	Link to OECD Guidelines, Universal Declaration of Human Rights, and ILO. Addition of topics and link to related documents. Addition of a dedicated paragraph on Whistleblower policy.
06/02/2024	<ul style="list-style-type: none"> <li>- Respecting Fundamental Labor Rights</li> </ul>	Link to UN Global Compact Principles.  Addition on slavery.