## Dataloy CODE OF CONDUCT

Building upon unwavering integrity, openness and collaboration for amplified strength



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## Building a Legacy,<br/> Embracing the Future

Guided by Ethical Conduct and Excellence.



Dear Colleagues,

At Dataloy, we are on a mission to unleash the potential of every team. To achieve this, we must act with unwavering integrity, open ourselves to new possibilities, and approach challenges with passion and determination. Each and every one of us bears the responsibility of upholding ethical conduct, honesty, and respect. Whether you are an employee, director, officer, agent, partner, representative, contractor, or consultant, we all have a vital role to play.

I want to reflect on the values that define us as a company. These values serve as our compass, guiding our actions and shaping our culture at Dataloy.

- Openness: Founded on trust, delivering on integrity & transparency.
- Respect: Diversity, belonging, and inclusion are intrinsic to our existence.
- Accountability: We take ownership, honour commitments, and deliver results.
- Collaboration: We unite diverse talents, amplify strengths, and achieve greatness together.
- Entrepreneurial: Fueled by passion, driven by innovation, and unafraid of challenges

To ensure that our values are upheld, we have established the Dataloy Code of Business Conduct and Ethics. This Code serves as a compass, directing our actions in every facet of our organisation, from the Board of Directors to our interns.

In addition to our policies and practices, the Code provides guidelines on how to interact appropriately with individuals and organisations. We are all accountable for holding our contractors, consultants, partners, suppliers, and every member of the Dataloy community to the standards outlined in our Code. The adherence to these principles is crucial for our future success, as they protect Dataloy from significant liabilities and safeguard our ability to conduct business.

I urge each of you to familiarise yourselves with the Code and commit to its principles. Furthermore, remember that we expect you to be knowledgeable about and compliant with the legal requirements relevant to your roles and the services you provide to Dataloy. We trust and anticipate that you will exercise sound judgment and adhere to the highest ethical standards when making business decisions, even in situations where there may be no explicit guidelines.

Above all, let us always prioritise doing the right thing. Each and every one of us has a part to play in upholding our values, fostering an environment of trust, respect, and integrity. Together, we will achieve great things.

Sincerely.

**Erik Fritz Lov** 

Chief Executive Officer & Founder

### Our essence-

### Confidence, Progress & Collaboration

### Mission

To simplify maritime operations and empower confident decision-making through innovative, transparent solutions that drive real-time insights, efficiency, and meaningful impact.

**Purpose:** This mission guides everything Dataloy does, from product development to customer interactions. It focuses on giving customers the confidence and tools they need to succeed in an increasingly complex industry.

### **Vision: Future Outlook**

Revolutionizing the maritime industry with purpose-driven innovation and meaningful impact. We aim to redefine voyage management, set new industry standards, and drive efficiency, transparency, and sustainability through continuous innovation.

### **Brand Promise**

Our brand promise is simple: Dataloy empowers you to make confident decisions and achieve continuous progress in your maritime operations.

### **Culture & Philosophy**

Dataloy + You is our guiding philosophy and culture—built on mutual trust, collaboration, and progress. Whether you're a partner or a teammate, you matter—because success is something we achieve together.

Our Purpose, Mission, Vision & Culture

At Dataloy, everything we do starts with purpose. Our mission is to empower every team in maritime logistics to navigate with confidence. We do this by building technology that enhances decision-making, drives operational excellence, and supports responsible and sustainable shipping practices.

Our vision is a world where digital collaboration moves the maritime industry forward—intelligently, ethically, and efficiently.

We exist to simplify and strengthen the maritime industry through technology that empowers people—those navigating the complexities of commercial shipping every day.

This is a shared journey. That's why we say "Dataloy + You."

It's more than a tagline. It's our belief that real impact happens through partnership. Whether you're a colleague, a customer, or a collaborator—your voice matters. Your decisions shape outcomes. Together, we go further.

Building a WE Culture at Dataloy

We believe in creating a culture where people thrive—not just perform. That's why we embrace a WE culture. It means we value collaboration over silos, curiosity over certainty, and progress over perfection. Everyone contributes. Everyone matters.

You'll see this reflected in how we work—with each other, our customers, and our community.

What "Dataloy + You" Means

Throughout this Code of Conduct, you'll often see the word we. It reflects our collective responsibility and shared values as a team. But make no mistake—you matter too. Your perspective, your contributions, and your integrity are essential to everything we do.

This Code of Conduct is part of that promise. It outlines how we show up for one another—with respect, accountability, and integrity. Because when we say "WE," we mean all of us. Not just employees, but everyone we work with.

Let's navigate with confidence—together.

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### Our values- leading with vision Inspiring Success

### **Our Values**

### **Openness:**

Through open communication and transparency, we create a culture where clarity and collaboration thrive, fostering an empowered environment that propels us to new heights of success.

### **Respect:**

By embracing and respecting diverse perspectives, we cultivate an inclusive atmosphere where everyone's contributions are valued, enabling us to harness the full potential of our team and drive innovation.

### **Accountability:**

Taking ownership of our actions and decisions, we demonstrate unwavering integrity and a commitment to delivering exceptional results, instilling trust and driving our organisation forward.

### **Collaboration:**

By uniting diverse talents, sharing insights, leveraging collective strengths, and promoting teamwork, we foster an environment where collaboration fuels creativity and drives us towards shared achievements.

### **Entrepreneurship:**

Fueled by passion, we cultivate a culture of innovation, fearlessly embracing challenges and pushing boundaries to create impactful solutions and drive our organisation's growth.

### Creating the Future We Want

At Dataloy, we are guided by a set of core values: Openness, Respect, Accountability, Collaboration, and Entrepreneurship. These values shape our thoughts, words, and actions, driving us to build the future we aspire to and cultivate a supportive and cohesive organisational culture. We foster a strong foundation for our collective growth by embracing these shared values.

### **Bridging the Gaps Between Rules**

As a global company, we operate within various legal frameworks and adhere to internal policies to ensure efficient operations and minimise risk. Our unwavering commitment to integrity goes beyond compliance. When faced with situations where rules are unclear or incomplete, our values serve as guiding principles, helping us make choices and conduct ourselves ethically. They bridge the gaps and lead us towards the right course of action.

### Can Versus Should

The fact that we can do something does not mean that we should do it. Our values challenge us to do the right thing: consider the broader impact of our actions, encompassing the well-being of our company, customers, and communities and acting with integrity as our compass. We strive to align our decisions with our values, upholding our responsibilities to all stakeholders.

In embracing our values, we shape a future where trust, respect, accountability, collaboration, and entrepreneurship are not just ideals but the bedrock of our culture and the driving force behind our success at Dataloy.



## About Our Code

Why it Matters "Building upon unwavering integrity and openness and embracing collaborative synergy for amplified strength", our Code of Conduct is intended to inspire, guide, and enable our best performance—individually and collectively. The Code promotes ethical decision-making and conduct by helping us identify potentially challenging situations. The Code is not simply about avoiding bad outcomes but about how we do business. By setting standards and guiding us in line with our values, the Code helps us build a strong ethical culture and achieve our business goals with integrity.

Who the Code Is for The code applies to all our permanent and temporary employees, sub-contracted consultants and others acting on our behalf – including the board (hereafter collectively termed employees). We are expected to help each other to comply with the rules, speak out if anything ought to be improved and report irregularities. If in doubt, an employee must consult with their immediate superior.

Our managers must be good role models, and have a special responsibility to act in accordance with the intentions of the code. Regularly communicating the importance of complying with our code of conduct and ensuring the necessary training are part of a manager's duties.

We expect our suppliers and partners to meet the same high standards of conduct as we do ourselves.

Guiding Principles of Our Management

- 1. Hands-on Approach: Our management believes in active involvement, fostering collaboration and leading by example.
- 2. Building a Strong Community: We prioritise creating a positive and inclusive environment where every team member feels valued and supported.
- 3. Fostering Diversity: We recognise the power of diverse perspectives, experiences, and backgrounds in driving innovation and success.
- 4. Long-Term Perspective: Our management takes a sustainable approach, focusing on enduring growth and responsible practices.
- 5. Seizing Opportunities: We embrace a proactive mindset, constantly seeking new opportunities for growth and staying ahead of the curve.



### Our Responsibilities

At Dataloy, we succeed together—with our colleagues, customers, and business partners. We each take responsibility for doing the right thing and help others do the same. We do this by:

- Upholding our core values.
- Understanding and complying with this Code and company policies.
- Following the letter and spirit of all applicable laws and regulations.
- Keeping our commitments to our stakeholders and leading by example.
- Reporting anything that is, or appears to be, a violation of our Code or our values.
- · Cooperating with company investigations.
- Never retaliate against anyone who makes a report in good faith or cooperates with an investigation.

If we lead or supervise employees, or manage business partners, we:

- Lead by example, with awareness of how our behaviours and decisions influence others.
- Recognise that perception matters—we must always do the right thing and never give anyone reason for doubt about our motives or actions.
- Emphasise that the means are always as important as the ends.
- Promote a positive work environment where everyone feels empowered to do the right thing, come forward with ideas, and raise questions or concerns without the fear of retaliation.
- Respond promptly and respectfully to questions and concerns, escalating where necessary to seek resolution.
- Regularly communicate the importance of following our Code and living our values.
- Never ask anyone—colleague or business partner—to do anything that violates the Code or our values.
- Promote awareness of and access to company policies and procedures relevant to our teams' work.
- Support ethics and compliance initiatives, including employee training, as essential business requirements.
- Are proactive in helping our team members understand their business responsibilities and ethical obligations, develop their leadership skills, and advance their careers and relationships.
- Refrain at all times from participating in or condoning conduct that would violate applicable laws, this Code, or company policy.
- · Never engage in or tolerate retaliation.



### Responsible Reporting

At Dataloy, employees are encouraged to report any concerning conditions responsibly, without fear of retaliation. Reporting should not create undue burden or harassment, and initial contact should be made with the HR manager. Alternatively, employees can contact another manager, safety representative, or union representative. All reports will be handled confidentially and in accordance with company procedures, upholding principles of impartiality and confidentiality.

Compliance, Human Rights, and Legal Responsibilities Compliance with Laws and Regulations: At Dataloy, we require employees to adhere to all applicable legislation and statutory regulations, encompassing both external requirements and internal rules. This includes laws, regulations, guidelines, and instructions.

Respecting Human and Worker Rights: We uphold the principles of human rights and worker rights for our colleagues, client employees, suppliers, and partners, as established in international conventions and local legislation.

Zero Tolerance for Breaches: Any breaches of applicable laws and regulations are deemed unacceptable. In the event of possible breaches or nonconformities, they will be handled in accordance with our company's procedures, which may result in consequences under labor, criminal, and civil law.

## Collaboration and Trust

Delve into our financial performance, including revenue growth, profitability, and key financial metrics that demonstrate our strong fiscal health.



## Treating Each Other with Respect

Consistent with our values, we strive to create an environment that is open, supportive, and safe.

Respect for others should always be prioritised in your in-person and online interactions with others, whether they be colleagues, partners, suppliers, customers, or the general public.

### Equal Opportunity: Anti-Discrimination, Harassment, Bullying, & Retaliation

Promoting a Respectful and Inclusive Workplace Every Dataloy employee has the right to work in an environment that is respectful, professional, and free from all forms of discrimination, harassment, bullying, and retaliation. Dataloy expects that all interactions among colleagues, either in person or over digital spaces, will be businesslike and free of bias, prejudice, and harassment. The same is required when a Dataloy employee interacts with our community, customers, and partners. We will not tolerate discrimination against or harassment of employees, consultants, contractors, or customers based on any characteristic protected by law, such as age, gender, gender identity, sexual orientation, race, national origin, citizenship, or disability.

### How we make it happen

Treating each other with respect means we:

- Stay mindful of how our words and actions might be received.
- Do not tolerate behaviour that could be considered degrading or intimidating to others or that could otherwise make them feel uncomfortable in our workplace.
- Listen actively and remain open to differing points of view on work issues.
- Address performance or behavioural issues privately, not in a large group or public setting.
- Engage Human Resources for guidance and support with difficult discussions.
- Remain vigilant for signs that others are being harassed or bullied.
- Avoid words or actions that degrade or disparage based on race, colour, age, sex, or any other characteristic protected by law.
- Report any suspected harassment to a manager, Human Resources, or any of the other resources available for speaking up—regardless of who is the direct target of the conduct.
- Foster a culture where anyone can comfortably raise a concern without fear of retaliation or retribution.



### Valuing Our Diverse Talents, Ideas, and Contributions

The Power of Diversity and Inclusion

At Dataloy, the strength of our global workforce lies in its diversity of talents and perspectives. Embracing diversity and inclusion is not just a conscious effort, but an inherent part of our DNA. By fostering a culture that values and celebrates diversity, we unlock collective strength, wisdom, and innovation.

Our commitment to diversity and inclusion extends to every aspect of our organisation. We strive to attract, develop, and retain the best talent, empowering each individual to contribute their unique skills and perspectives. This approach is instrumental in positioning us as a global leader in our industries and shaping the future.

The knowledge, skills, and insights that our diverse workforce brings fuel our innovation. They enable us to create intelligent and sustainable solutions that benefit our customers and the world at large. By being a diverse and inclusive organisation, we enhance our ability to collaborate effectively, go the extra mile for our customers, and foster meaningful partnerships with our business associates and communities, wherever we operate.

Together, we embrace the power of diversity and inclusion, driving us towards excellence and enabling us to make a positive impact in all areas of our business.

### **Promoting Equal Opportunity**

Equal
Opportunity for
Success

We provide everyone with the same chance to succeed based on their merits and measurable skills, without discrimination. We are transparent and fair in our efforts to attract talented colleagues and develop their potential. We focus on the right fit for skills and experience as well as for our values and culture. Promoting equal opportunity allows us to recruit and retain the best people for the job and optimise our pursuit of excellence. When we feel treated fairly on our merits, we are likely to be more engaged and productive; this supports the company's drive to create innovative and dependable products.

### **Protecting Personal Information**

Secure.
Confidential.
Trustworthy.

At Dataloy, we prioritise the privacy of personal information. We ensure that personal data is not disclosed without a legitimate business need and legal right. By treating personal information with proper safeguards, we fulfil our legal obligations and protect the security and reputation of our company.



### **Maintaining Health & Safety**

Ensuring a Healthy and Safe Work Environment Dataloy places the utmost importance on the health and safety of our team members. We are dedicated to providing a workplace that prioritises the well-being of everyone, promoting a culture of care and vigilance. To ensure a healthy and safe environment, we rely on the continuous cooperation of all team members. If you have any concerns related to health or safety, we encourage you to take immediate action and reach out to your manager and HR manager.

### **Drugs, Controlled Substances, & Alcohol**

Misuse of intoxicants

At Dataloy, we are committed to ensuring a healthy working environment both within our premises and during business trips.

While we recognise that alcohol may be served on social occasions organised by us, our clients, or our partners, it is crucial that everyone exercises responsibility and moderation. Engaging in aggressive or inappropriate behaviour due to the influence of alcohol or any form of intoxication is strictly unacceptable.

We want to foster an atmosphere where all employees feel safe, respected, and able to perform their best. Therefore, we maintain a zero-tolerance policy towards illegal drugs. Employees are prohibited from possessing, trading, or using illegal substances and reporting to work under their influence.

By promoting responsible choices and maintaining clear guidelines, we aim to create a supportive and secure working environment where every individual can personally and professionally thrive. Together, we uphold the values of professionalism, productivity, and well-being at Dataloy.

### **Mitigating Conflict of Interests**

Ensuring Ethical Conduct and Transparency At Dataloy, we prioritise the avoidance of actual or potential conflicts of interest to safeguard the integrity of our decisions and actions. We strive to ensure that personal financial interests or the interests of other companies do not take precedence over the best interests of Dataloy. To prevent conflicts, it is essential to adhere to the following guidelines:

- Refrain from participating in decisions on behalf of Dataloy that could lead to, or give
  the appearance of, providing personal or financial benefits to yourself, your family,
  close friends, or individuals with whom you have a personal relationship.
- Do not misuse or exploit Dataloy's confidential information or intellectual property for personal gain or for the benefit of others.
- Disclose any business opportunities that you become aware of through your work at
  Dataloy before pursuing them independently. Transparency ensures that the
  organisation can evaluate and potentially pursue such opportunities if aligned with our
  goals.

# **Business Practices**

Promoting Integrity and Accountability:
Upholding ethical business practices to foster trust, transparency, and responsible conduct throughout our organisation.



## Excelling for **Our Customers**

Our founders built a reputation with their customers and business partners for integrity and honesty. Dataloy is proud to carry that reputation into the future, as we continue building relationships based on trust.

### **Dealing Honestly and Fairly**

Fair, truthful, and transparent in all our business dealings Truthful and accurate communication of information about our products and services is essential to meeting our commitments to our customers. They deserve candid assessments of our products' capabilities and limitations. Being fair and truthful with our business partners promotes dependable relationships that help us serve our customers and deliver safe, reliable products and services. Our commitment to fair competition and honesty is respected by our competitors, who recognise our dedication to competing on the merits of our offerings, services, and people.

### How we make it happen

In the marketplace, we prioritise dealing honestly and fairly by:

- Marketing and selling our products truthfully, based on their merits.
- Preparing bid proposals with proper cost and pricing data.
- Upholding the integrity of the bidding process and negotiating contracts in good faith
- Focusing on highlighting the positive attributes of our products and services rather than disparaging competitors.
- Respecting intellectual property, proprietary information, and sensitive data, using them only with authorisation, and promptly reporting any suspected instances of improper access or use.
- Complying with all applicable laws and regulations, both in their letter and spirit.
- Holding all representatives, consultants, and business partners accountable for complying with these requirements.

At Dataloy, we are committed to conducting business ethically, and maintaining the trust of our customers, business partners, and the broader marketplace.



### **Competing Fairly and Legally**

We compete vigorously, yet always fairly and legally, wherever we do business Competition makes us better. Free markets drive us to be more efficient and innovative and to deliver better products and services. This is good for us and for our customers, who receive better value. Anti-competitive practices, on the other hand, distort the marketplace.

As a Dataloy employee, you must deal ethically and lawfully with the company's customers, suppliers, competitors, and employees in all business dealings on the company's behalf. You should not take unfair advantage of another person by abusing privileged or confidential information or through improper manipulation, concealment, or misrepresenting material facts.

### **Confidentiality and Data Security**

Safeguarding Information and Ensuring Data Security

At Dataloy, we prioritise the duty of confidentiality and ensuring robust data security practices. These principles guide our actions to protect sensitive information and uphold the trust placed in us by employees, clients, suppliers, partners, and stakeholders.

- Confidentiality: All employees are obligated to maintain the confidentiality of
  information obtained during their employment, both within our company and with
  our clients or partners. This duty extends beyond the employment relationship,
  demonstrating our commitment to safeguarding confidential data even after the
  employee's tenure concludes.
- Data Security: We prioritise data security to preserve the confidentiality, integrity, and availability of the information we handle. Managers and employees are responsible for staying updated on security best practices. By consistently enhancing our data security measures, we mitigate risks and protect sensitive data from unauthorised access or misuse.
- Compliance with Data Protection: We adhere to applicable rules and regulations
  governing the processing of personal data. As custodians of personal information,
  we take data protection seriously and ensure compliance with legal requirements.
  Our commitment to confidentiality and data protection ensures that employees,
  clients, suppliers, partners, and owners can trust us to handle their data responsibly
  and in accordance with relevant legislation.

By upholding the duty of confidentiality and implementing robust data security measures, we create an environment of trust and reliability where confidentiality is respected, sensitive information is safeguarded, and data protection is prioritised.



### **Anti-bribery and corruption**

We prioritise integrity, it is our essence: our way of being.

We prioritise integrity and ethical conduct, avoiding involvement in bribery and corruption. We achieve this by:

- Competing based on the merits of our products, services, and business terms.
- Rejecting any form of bribes, kickbacks, or improper influences in our business decisions.
- Exercising caution when providing or promising anything of value to gain business advantages.
- Adhering to company policies and seeking guidance on appropriate business gifts and entertainment.
- Ensuring accurate and transparent records of all transactions.
- Full compliance with anti-corruption laws and regulations globally.
- Partnering with organisations and individuals who share our strong ethical values.
- Avoiding the use of third parties for any improper activities or payments.
- Encouraging a culture of vigilance and responsibility by promptly reporting any concerns of corruption or bribery to the management.

Our unwavering commitment to these principles fosters a culture of integrity, transparency, and responsible business practices at Dataloy.

### Gifts, Hospitality and Entertainment

Navigate professional courtesies responsibly and transparently.

Promoting fair competition is a core value at Dataloy. We believe in achieving success through the strength of our products and services rather than relying on gifts, hospitality, or sponsorships. It is crucial to understand the following:

- Various countries have laws that restrict certain business-related gifts and hospitality.
- Perceptions matter: What may seem modest to one person might be perceived as excessive by another. Receiving gifts or hospitality can give rise to suspicions of improper behaviour.
- Frequent giving can increase the risk of negative perceptions.
- It is never acceptable to link gifts, hospitality, or sponsorships to gaining business, retaining business, or obtaining improper advantages.
- Improper giving can result in disciplinary action and expose individuals and the company to legal consequences.

Our business decisions must always be impartial, and gifts or favours should not be accepted or given if they create a sense of obligation, compromise professional judgment, or create the appearance of doing so.

Occasionally, offering or accepting business gifts or entertainment within reasonable limits may be legitimate. This typically includes modest forms of hospitality, such as lunches or dinners, and occasional gifts of minimal value that do not influence business decisions. If you encounter a gift of significant value, consult your local gifts and hospitality policy and seek guidance from your manager.

Your manager must approve entertainment and should have an element of information or training, except for meals.

By adhering to these guidelines, we uphold our commitment to ethical conduct and ensure that our business practices always reflect integrity, fairness, and professionalism.



### Creating, Maintaining, and Disclosing Accurate Books and Records

Integrity through accurate records for trust and informed decisions. Creating, maintaining, and disclosing accurate books and records is a fundamental practice at Dataloy. We understand the importance of operating effectively and providing reliable information to those who depend on it.

Every task, from preparing financial reports to completing timesheets, contributes to upholding our commitment to accurate record-keeping and financial integrity. It is our collective responsibility to ensure that our records, in any format, are comprehensive, precise, and up to date. This empowers us to make informed business decisions based on accurate information and safeguards our reputation for honesty and transparency. Misrepresenting financial results or inaccurately describing transactions is considered fraud and can result in severe civil and criminal penalties. Customers, shareholders, financial analysts, regulators, and other stakeholders rely on us to maintain the highest standards of truthfulness. By upholding accurate record-keeping practices, we demonstrate our commitment to ethical conduct and foster trust in our organisation.

Safeguarding the valuable resources of Dataloy and third-party entities through proactive measures and diligent protection.



### Safeguarding Our Assets

### Safeguarding Company Assets / Information

Protecting Our Assets We work hard to enable and empower all Dataloy networks and environments with best-fit cyber security defence and monitoring capabilities, but everyone has a responsibility to use tech resources appropriately and professionally to make sure we stay secure. We risk ourselves and the company if we don't put cyber security at the top of our priority list. All employees should exercise good judgement regarding the appropriate use of information, electronic devices, and network resources per Dataloy policies and standards, as well as local laws and regulations.

### **Use of Company Assets and Networks**

Responsible Usage

Dataloy strives to give employees the tools they need – both equipment and information – to be able to act with max impact and experiment bravely. We ask that you treat these assets carefully to avoid loss, theft, or damage so that we can continue operating effectively. This includes physical assets (such as IT equipment) and nonphysical assets (such as confidential information and intellectual property rights). This applies when working at any location – whether in the office or home. When working with Company information or equipment (such as laptops, email, apps, databases, etc.), you should set up complex passwords that cannot be easily guessed and should never share passwords.

### **Use of Email & Other Forms of Electronic Communication**

Adhere to Responsible Messaging

When using emails and other forms of electronic communication it is important to always adhere to appropriate usage guidelines. This includes using professional language, maintaining confidentiality when required, and respecting the intended purpose of the communication platform. By exercising responsible and appropriate communication practices, we contribute to a secure and efficient digital environment at Dataloy.

### **Copyrighted Materials**

Ensure proper permissions

Published works such as photographs, screenshots, videos, music, articles, white papers, web sites, whether in hardcopy or electronic format, are generally protected by copyright. Dataloy may sometimes want to use such publicly available materials in presentations, promotional materials, trade shows, or Dataloy events. These works are generally protected by copyright law, and their unauthorised use may constitute copyright infringement. Do not use any portion of them without obtaining permission from the copyright holder.

# esponsible Communication

Fostering an environment of open and responsible communication, where information is shared transparently, ideas are valued, and respectful dialogue is encouraged, promoting collaboration and innovation at Dataloy.



## Open & Accountable Communication

We communicate truthfully, accurately, and consistently with customers, investors, and other stakeholders. This shows respect and builds trust, and it helps us remain accountable to those we serve.

### Communicate with Integrity and Respect for Stronger Connections

Everybody's voice matters, and we want you to use yours consciously.

We are all ambassadors of Dataloy. Whether in person, by email, by phone, or through social media, we must communicate thoughtfully and respectfully.

Our communication will be open, honest and clear. That applies both internally and externally and is important for maintaining trust in us. Only specified people comment to the media on behalf of the company, and all external communication must be conducted in cooperation with our communication and marketing department.

Every employee must exercise good judgment about what they say in various media about clients, partners, competitors and colleagues. They must be aware that it is difficult to distinguish between what is said as our representative and in a private capacity. Behave in accordance with the general rules of good manners.

How we make it happen

Communicating clearly and responsibly means that we:

- · Are courteous and professional in all our communications, no matter what the medium.
- Never disclose classified, confidential, proprietary customer information without authorisation.
- Politely decline to provide details we are not authorised to disclose.
- Do not speak for the company unless specifically authorised.
- Refer media inquiries to Marketing and communications personnel.
- Assume that anything we say to media representatives is on the record and could be taken out of context or distorted.

### **Using Social Media Responsibly**

We embrace the responsible use of social media for business purposes Social media has transformed how we connect, share information, and influence opinion. In business, it enhances our ability to have honest, direct, and meaningful exchanges with customers and other stakeholders. In our personal lives, it brings us closer to family, friends, and new opportunities. We must use these tools responsibly because information can spread quickly and unpredictably online, making it difficult to control or remove. We respect every individual's right to free speech and creative expression. We also have a duty to protect the company's reputation and interests. The nature of our products and services demands particular caution in what we share online.

# **Partners**

Fostering an environment of open and responsible communication, where information is shared transparently, ideas are valued, and respectful dialogue is encouraged, promoting collaboration and innovation at Dataloy.



## Selecting & Collaborating With the Right Partners

### Communicate with Integrity and Respect for Stronger Connections

Everybody's voice matters, and we want you to use yours consciously.

We seek business partners who can help us achieve our goals by working collaboratively to provide expertise, resources, efficiency, and innovation. This helps us deliver excellent, reliable products on time and on budget. We expect partners to share our high ethical and safety standards and our passion for making a positive impact in the world.

How we make it happen

Selecting and collaborating with the right partners means that we:

- Seek to do business with partners who best meet our needs and share our values.
   Evaluate partners on clear performance measures, such as quality, price, service, reliability, and availability.
- Conduct risk-based due diligence to ensure potential partners are qualified and reputable before onboarding.
- Monitor business partner performance on an ongoing basis.
- Expect our partners to uphold our values and comply with anti-bribery conventions and all other applicable laws.
- Treat all current and potential partners fairly and with integrity, regardless of the transaction value or length of the relationship.
- Avoid any conflicts of interest (or the appearance of them) by avoiding the selection of a partner based on friendships, family relationships, or financial interest.
- Formalise relationships in writing to provide transparency and accountability.



## Gratitude, Collaboration, and Continued Success

At Dataloy, we are fueled by our passion for innovation. We are relentlessly pursuing new possibilities, aiming to create a safer, smarter, and more interconnected world. Guided by our purpose and values, we remain focused on the why, how, and what, always keeping the broader perspective in mind. Together, we strive to achieve greatness, driving positive change in the industry. This Code serves as our compass, providing practical guidance and access to additional resources to ensure that every achievement is attained through ethical means.

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### **Dataloy**



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