



# Code of Conduct

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GREEN MINERALS  
*Enabling the green shift*

The Code applies to everyone working with or on behalf of the Company, including employees, contingent staff, and Board Members. The Company expects that all its activities are carried out following ambitious standards of ethics and integrity.



The Code is designed to promote honest, ethical, respectful, and lawful conduct, including:

The ethical handling of conflicts of interest between personal and professional relationships.

The prevention of conflicts of interest.

Full, fair, accurate, timely and valid disclosure of information in the Company's communication either public or internal.

Compliance with applicable governmental rules and regulations.

The support of diversity, belonging, and equity; and elimination of unconscious biases that influence our decisions in an unfairly and negative way.

Responsibilities of individuals.

Rules for reporting breach of the Code.

# Responsibilities



The Company's personnel and associated individuals are responsible for:

Understanding the Company's standards of ethical business practices, by being familiar with the Code and able to act according to the provisions of the Code.

Recognizing that their business actions affect the reputation and integrity of the Company.

Fulfil their duties in a manner that promotes and preserves public trust, proper stewardship, and confidence in the integrity of the Company.

Complying with the Company's values, principles, and rules.

Promoting a culture of respect.

Reporting any breach of the Code according to in-place procedures, see section Reporting a Violation of the Code.

# Performance of Duties



Company personnel shall act honestly and ethically and perform their duties to the best of their ability and diligently.

Company personnel shall not harass, or discriminate others based on race, colour, religious beliefs, gender, national origin, ethnicity, age, physical characteristics, marital status, or sexual orientation in the conduct of services for the Company.

Company personnel shall comply with relevant international, national, local rules, regulations, legislations, guidelines, as well as industry best practices.

Company personnel must not falsify, destroy, conceal, or wilfully omit required entries on any record within their control and/or responsibility.

Company personnel with reporting responsibilities shall provide full, fair, accurate, timely and valid disclosure in their reporting.

Company personnel who are attorneys, certified public accountants, or members of other professional groups are also bound by the appropriate professional duties and codes of conduct of those roles which are not covered by the Code.

# Conflict of Interest

Conflict of interest refers to a situation in which an individual associated with the Company have competing interests that could potentially undermine their objectivity or decision-making ability.

In such cases, the conflicting interests might lead them to prioritize personal gain, relationships, or other external factors over the best interests of the Company, its shareholders, or stakeholders.

Company personnel shall have the responsibility of administering the affairs of the Company honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of the Company.

Company personnel shall have an obligation to avoid conflicts between personal interests and the Company's interests where possible, and to pursue the ethical handling of actual or apparent conflicts when unavoidable through full disclosure to the Company's Legal Department.

Company personnel shall use the resources, property, and funds under their control judiciously and in the best interest of the Company and shall not use their positions with the Company or knowledge gained therein for their personal benefit or for members of their family.

Company personnel are expected to devote their full time and attention to the Company's work during regular business hours.

Company personnel shall not use their Company position or title, or any Company time, personnel, equipment, supplies, facilities, or goodwill in connection with outside activities without full written permission.

## Confidential Information

Company personnel who have information of a confidential or proprietary nature shall not disclose that information outside the Company, either during or after service with the Company, except with written authorization of the Company or as may be otherwise required by law. Confidential information includes, without limitation, all non-public information that might be of use to competitors, or harmful to the Company or its clients, if disclosed.



## Company Assets

Company personnel shall have a personal responsibility to protect the assets of the Company from misuse or misappropriation.

The Company's assets include:

- Tangible assets, such as facilities and their equipment.
- Intangible assets, such as proprietary intellectual property, trade secrets and business information.

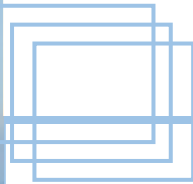
How to protect them:

- Ensure that assets are not damaged, lost or stolen
- Report immediately when assets present defect or need repair
- Use all assets adequately and with good judgment
- Never allow unauthorized individuals to use our assets

Infrequent personal use of Green Minerals assets, such as email or browsing the web, is allowed. The company expects good judgment from employees, and never permits access to unauthorized websites (e.g., gambling, or adult content). Work product or work-related information sent, received, or downloaded on our systems is company property, in accordance with applicable law. We may also review the contents of our systems at any time, where permitted by law. Never use our electronic assets to engage in illegal activity, activity that violates our policies or anything that would negatively affect our company or its reputation.

## Compliance with Laws

Company personnel shall comply with all applicable laws and regulations in all jurisdictions where the Company does business. It is the duty of the Company to inform personnel of such laws and regulations when personnel are not familiar with these laws and regulations.



## Anti-Corruption

Company personnel shall comply with all applicable laws and regulations in all jurisdictions where the Company does business. It is the duty of the Company to inform personnel of such laws and regulations when personnel are not familiar with these laws and regulations.

- Impermissible Payments

The Company prohibits giving/taking anything of value, directly or indirectly, to/from a governmental official, agent or individual anywhere in the world in consideration for such official's, agent's or individual's assistance or influence; the purpose of which is to obtain favoured treatment with respect to any aspect of the Company's business.

- Fair dealing

Company personnel are prohibited from taking unfair advantage of any entity through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Information about the Company's competitors must be used in an ethical manner and in compliance with the law.

Information shall not be obtained through theft, illegal entry, blackmail, or electronic eavesdropping, or through misrepresentation of an affiliation with the Company or its identity.

# Human Rights and Labour Standards

## Modern slavery

There are modern slavery risks in all sectors and industries. Modern slavery is defined by the United Nations as an umbrella term covering practices such as forced labour, debt bondage, forced marriage, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. Green Minerals AS is committed to preventing modern slavery in all its forms. We believe that every individual deserves to be treated with dignity and respect, and we are dedicated to ensuring that our operations and supply chains are free from any form of forced labour, or other exploitative practices.

## Compliance with human rights

The Company recognises, supports, and respects the internationally proclaimed human rights charter and will not participate in business that violates human rights as described on the Universal Declaration of Human Rights<sup>1</sup> (United Nations General Assembly, Paris, 10 December 1948 - General Assembly resolution 217 A).

## Child Labour

The Company does not allow the employment of workers under legal working age. The Company does not allow the employment of individuals under 18 years of age in a hazardous capacity. The Company does not associate with Child Labour. The Company does not associate or subcontract companies engaging with Child Labour.

## Compliance with Labour Standards

The company respects and adheres to the standards in accordance with the International Labour Organization<sup>2</sup> relating to minimum wage, working hours, employment security, discrimination etc.

## Freedom of association

The Company recognises and respects the freedom of association and the right to collective bargaining. Green Minerals does not allow any forms of forced and compulsory neither internally nor externally.



# Environmental Responsibility

Green Minerals shall act responsibly with focus to reduce direct and indirect negative impacts on the environment. We shall comply with relevant international standards and abide by local laws. The company shall make efforts to put in place strategies and processes to guide our daily operations with a sustainable approach to avoid potential impacts and mitigate actual negative impacts.

The Company shall strive to safeguard biodiversity, to improve energy efficiency, to reduce emissions and waste. and to keep transparency in operations by informing stakeholders about impacts. It is essential for the Company to raise and to nurture environmental awareness among its employees about the company's impacts.

It is essential for the Company personnel to understand the environmental impact in their areas of work and contribute to mitigate it, to follow environmental best practices and participate actively in environmental programs.



## Reporting a violation of the Code

It is the duty of the Company personnel to review and assess their conduct in view of the provisions to the Code. Reporting violations helps the Company to address issues promptly and take appropriate action.

Company personnel who violate the Code, including the obligation to promptly report conflicts of interest that violate this Code, could be subject to disciplinary action.

Company personnel shall seek, either in writing or in person, the advice of their supervisor or the Legal Department when a reasonable doubt regarding an ethical consideration arises. For anonymous reporting, the Company encourages anyone to use the whistle-blower channel: [whistle@greenminerals.no](mailto:whistle@greenminerals.no) as per the Company's Whistleblower Procedure.

Conscientious efforts shall be made to protect the confidentiality of any individuals who come in good faith to report violations and/or concerns regarding the Code. Retaliation against anyone who reports a violation or cooperates with an investigation is strictly prohibited.

The Legal Department is responsible for reviewing any alleged violations of the Code and determining the adequate course of actions.