



# TOMRA

## Code of Conduct

[www.tomra.com](http://www.tomra.com)

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## Message from our CEO



Ever since TOMRA was founded in 1972, our company culture has been rooted in the principles of honesty and integrity, with the central aim of creating solutions for better business and a better environment. We have been fortunate to have attained a high level of success and a solid reputation as a global leader driving the resource revolution. Maintaining this reputation is fundamental to our future success, and this requires constant vigilance that we uphold and honor our values at all times, wherever we are doing business.

Our activities span across the globe, and we have the responsibility therefore to comply with an extensive array of laws and regulations. This complex environment demands that every employee and leader be committed to effective corporate governance, which I believe is the foundation of a well-run business.

Our global footprint also means that we are working with customers and partners with diverse backgrounds and cultures. It is very important therefore that we understand and embrace this diversity, while holding true to our company values.

It is also important that while delivering on our primary task of developing good solutions for our customers, we are mindful of our impact in society and the opportunities

we have to encourage and support developments that can create a better world. We must strive to be a role model in our local communities, promoting safe and healthy workplaces, showing care for the environment, and contributing to sustainable economic development.

Our Code of Conduct sets forth the responsibilities that all of us share in carrying out our business activities with integrity and respect for all people. Whether you are an employee, a manager, contract staff or an external partner, it is expected that you understand and abide by our Code of Conduct. By following this Code, you are doing your part to make TOMRA credible, competitive and a leader that is recognized for its high ethical standards.

A handwritten signature in black ink that reads "S. Panschand". The signature is fluid and cursive, with a distinct "S" at the beginning.



## Who Is Affected by our Code of Conduct?



The main purpose of TOMRA's Code of Conduct is to ensure that all employees, and anyone acting on behalf of TOMRA, perform their activities in an ethical way.

Contract staff working for a TOMRA company must also follow the Code. Contractors and consultants who are agents of, or working on behalf of, or in the name of a TOMRA company (through outsourcing of services, processes or any business activity), are required to follow the Code when acting on our behalf. The rules will help secure compliance with laws and regulations. TOMRA expects all of its business partners to abide by similar principles in their own operations.

This Code of Conduct provides a framework for what TOMRA considers responsible conduct but is not exhaustive.

As a TOMRA employee, you should always strive to exercise good judgment, care and consideration in your service for the company.



## Our Vision, Mission, Culture and Values

Our vision is to lead the resource revolution within the business streams of reverse vending, material recovery, food, recycling and mining – enabling better utilization of the world's natural resources.

Our mission is to create sensor-based solutions for optimal resource productivity, making sustainability profitable – with increased relevance and meaning.

The TOMRA culture is rooted in the principles of honesty and respect for all people. Successful businesses are profoundly dependent on trust and a good reputation. TOMRA's operations demand a high degree of care, honesty and integrity.

TOMRA's core values are viewed as one of the most critical aspects of our company culture, reflecting the expectations for how we conduct ourselves and approach our daily tasks.

Our values serve as the basis for the decisions we make, helping to clarify our work and how we should interact with our customers and other stakeholders.

**We believe in our trusted technology and partnership for better business and better environment.**

### INNOVATION



#### Dare

- Challenge the status quo
- Take responsible risk
- Accept failure and learn from it
- Be persistent

#### Explore

- Be curious and eager to learn
- Be creative
- Take ownership of self-development
- Share knowledge

#### Advance

- Improve continuously
- Be open to new ideas and solutions
- Review and evaluate processes

### PASSION



#### Engage

- Show enthusiasm
- Be willing to go the extra mile
- Collaborate

#### Inspire

- Motivate
- Encourage
- Have a positive attitude
- Inspire as a storyteller

#### Enjoy

- Celebrate success
- Have fun
- Contribute to strong team spirit

### RESPONSIBILITY



#### Commit

- Be honest
- Deliver on objectives
- Communicate openly and transparently

#### Deliver

- Be quality conscious
- Be accountable for decisions, actions, and outcomes
- Understand and contribute to company objectives
- Be customer-focused

#### Care

- Treat others the way you want to be treated
- Involve and support people
- Show appreciation and respect others
- Care for the environment



## Your Responsibilities



The Code of Conduct is for you. It sets the boundaries within which all TOMRA staff must operate every day, without exception. Read it. Understand it. Follow it. It is also your responsibility to comply with all applicable laws and regulations, international or local.

### YOUR RESPONSIBILITIES

- Understand the risks in your role and how to manage them.
- Learn about the policies and procedures related to your job and understand how to apply them to your daily work.
- Stay attuned to developments in your area or industry that might impact TOMRA's compliance with laws and regulations or reputation in the marketplace.
- Seek advice when things are not clear. If you are uncertain whether an activity is legally or ethically acceptable, just ask.
- Make sure that any third-party contractors, agents or consultants you work with are aware that we are bound by our Code and that they should act accordingly.
- Attend and actively participate in compliance training and activities.
- Speak up. It is your duty to report any suspected violations of the Code.
- Remember: Whatever your role with TOMRA, we expect you to commit to following the Code in the work you do every day.



## Responsibilities for Leaders



We believe in flat organisations and an open dialogue – i.e. leadership is not about titles, it is about behaviour.

Our leaders are committed to promoting our ethical standards and act as role models for their teams. We expect managers to show leadership in following our Code and maintaining a culture where it is normal to do the right thing and people feel confident about speaking up.

### **AS A LEADER YOU MUST:**

- Lead by example always.
- Understand the Code violation risks that apply in your business or function, and the procedures to mitigate them.
- Ensure your staff understand the procedures they should follow to avoid violating the Code.
- Make sure anyone new to your team is briefed promptly on our Code of Conduct and where they can seek advice and support.
- Make sure your team members participate in required compliance trainings and activities.
- Create an environment where people feel comfortable speaking up and asking questions without risk of retaliation.
- If you are told of a possible violation of the Code, you have a duty to report it. You may refer it to the Group Compliance Officer.
- You must also ensure you keep all reported concerns confidential.
- Be consistent when enforcing our standards and holding people accountable for their behaviour at work.
- Follow the TOMRA Leadership Principles.



## What Happens if I Violate the Code?



We will not tolerate any breaches of the Code or the law. Violations of the Code and the relevant policies can result in disciplinary action, up to and including dismissal.

In some cases, TOMRA may report a violation to the relevant authorities, which could also lead to legal action, fines or imprisonment. All disciplinary actions will be reasonable, proportionate and in accordance with applicable policies and law.



## Asking Questions and Reporting Concerns



TOMRA promotes openness and transparency in all our activities and all employees and business partners are encouraged to report any violations of TOMRA's Code of Conduct or other policies.

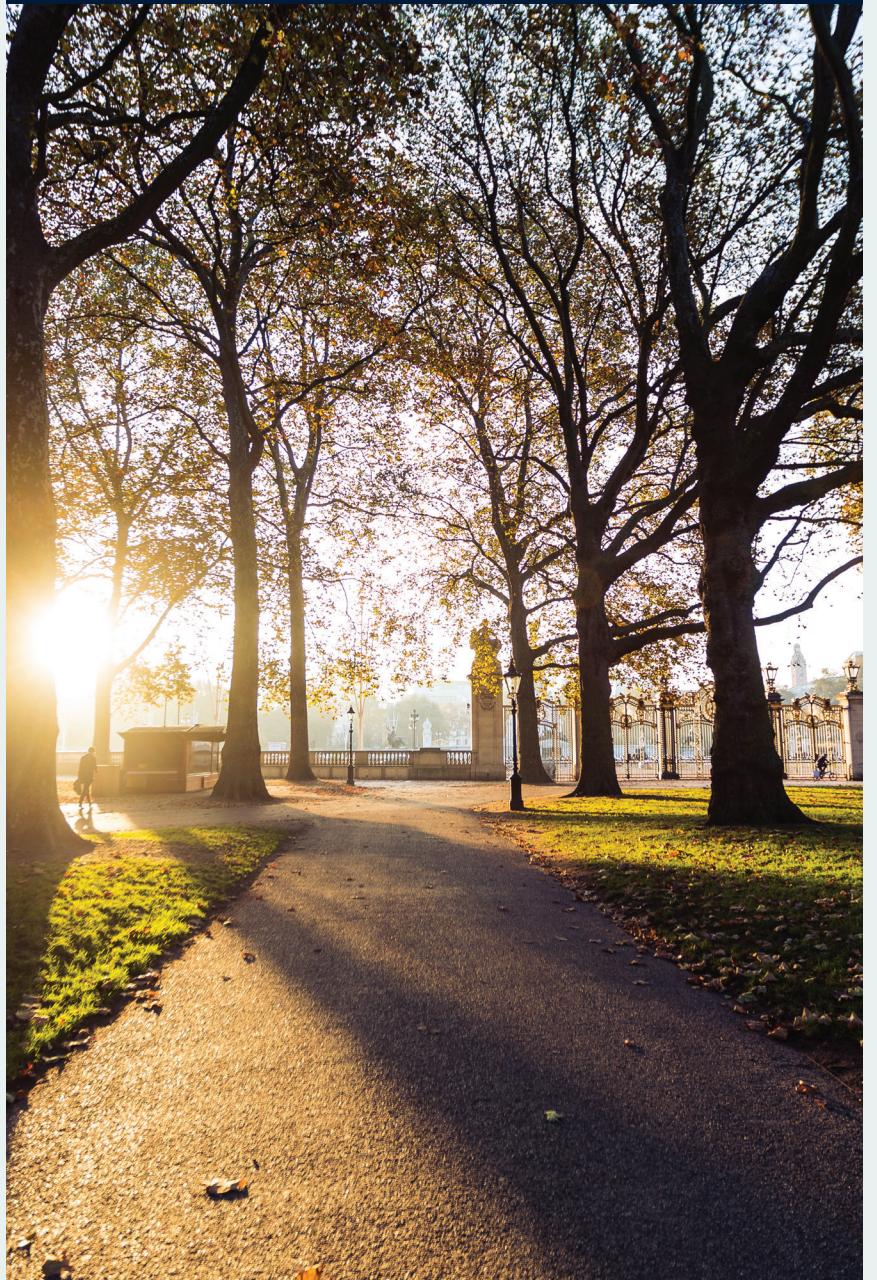
If you would like advice on any matter relating to the Code or wish to report a concern, speak to your line manager, the Group Compliance Officer or a Human Resources representative. Alternatively, you can send an email to [ethics@tomra.com](mailto:ethics@tomra.com). Such concerns or complaints may be reported confidentially, in your preferred language and – if you find it necessary – anonymously.

If you know or suspect someone is violating the Code, you have a duty to report it. If you do nothing, you risk TOMRA's reputation and financial penalties that would affect TOMRA's bottom line. Reporting a concern also gives TOMRA the opportunity to detect early a potential or actual violation of our Code.

TOMRA will not tolerate any form of retaliation directed against anyone who raises a concern in good faith about a possible violation of the Code. In fact, any act or threat of retaliation against TOMRA staff will be treated as a serious violation of our Code.



## Health, Safety, Security and Environment



We are committed to the goal of doing no harm to people on our facilities, job sites and communities we serve and protecting the environment while developing solutions for transforming how the world obtains, uses and reuses its resources. It means prevention of all accidents and incidents related to people, environment and assets.

Risks vary from location to location and every employee needs to understand the local risks and help prevent and mitigate them to protect employees, environment, infrastructure, information, assets and the reputation of the company.

TOMRA maintains high standards for social and environmental performance. We consistently follow these high standards irrespective of instances where less stringent national regulations exist. We are committed to minimizing the impact of our businesses on the environment with methods that are socially responsible and sustainable.

Every TOMRA company, contractor and joint venture under TOMRA operational control is required to have a systematic approach to the management of Health, Safety, Security and Environment (HSSE), designed to ensure compliance with the law, standards and procedures, achieving continuous performance improvement.

### YOUR RESPONSIBILITIES

- HSSE is everyone's responsibility and you must act to contribute to a healthy, safe and secure work environment.
- Understand and comply with all the HSSE policies that apply to you, including international and local laws and regulations.
- Implement TOMRA management tools and processes to find and mitigate HSSE concerns at your site.
- Question unsafe or improper operations and intervene if necessary to address them.
- You must report and correctly act on a potential HSSE incident as soon as you become aware of it.



## Equal Opportunity



We firmly believe that a sound mix is making us stronger. TOMRA is committed to an inclusive work culture and appreciates and recognizes that each person is unique, valuable and should be respected for their individual abilities.

TOMRA does not accept any form of discrimination based on race, colour, religion, gender (including pregnancy), sexual orientation, gender identity, marital status, national origin, union membership, age, mental or physical disability, amnesty, veteran status., etc., without this list being considered exhaustive.

TOMRA shall provide equal employment opportunity and treat all employees fairly. TOMRA employees shall only use merit, qualifications and other professional criteria as basis for employee-related decisions, regarding for instance recruitment, training, compensation and promotion.

We aspire to sustain a diverse and inclusive culture where everyone feels valued and respected from our employees to our customers and partners.

### YOUR RESPONSIBILITIES

- Whenever 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.



## Human Rights



Conducting our activities in a way that respects human rights is a business imperative for TOMRA. Our policies and standards help us establish fair labour practices and a positive work environment.

We comply with applicable laws, regulations and internationally recognized human rights throughout our own operations and regularly engage with our suppliers, contractors, other business partners to contribute, both directly and indirectly, to the general well-being of the communities in which we operate.

### YOUR RESPONSIBILITIES

- Maintain high awareness on relevant human rights risks in our business and those of our external partners.
- You must ensure that all your work complies with TOMRA commitments to human rights.
- Oppose all forms of human trafficking, forced labour and illicit forms of child labour in our operations or value chain.
- If you know of or suspect any potential human rights violations relating to our business, it is your duty to speak up to your manager, Human Resources or Group Compliance Officer.



## Harassment



TOMRA will not tolerate any form of harassment. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating, offensive or hostile.

Harassment may be a gesture, or verbal, physical, visual, written or sexual in nature. It can be a single act or repeated actions.

### YOUR RESPONSIBILITIES

- Take steps to create and maintain a good working environment.
- You must always treat others with respect and avoid situations that may be perceived as inappropriate.
- Feedback, criticism and challenge must always be delivered in an appropriate and respectful manner.
- Never engage in physical or verbal intimidation or humiliation, inappropriate jokes or comments, or display disrespectful material.
- Be aware of cultural sensitivities – what is acceptable in one culture may not be in another. It is important to understand these differences.
- You may always contact your line manager, Human Resources or the Group Compliance Officer.



## Protection of Assets



TOMRA assets come in many different forms – physical, electronic, financial and intangible. Whether it is a TOMRA laptop, phone, software, our technology or brand or even a facility or building, we expect everyone to take good care of our assets.

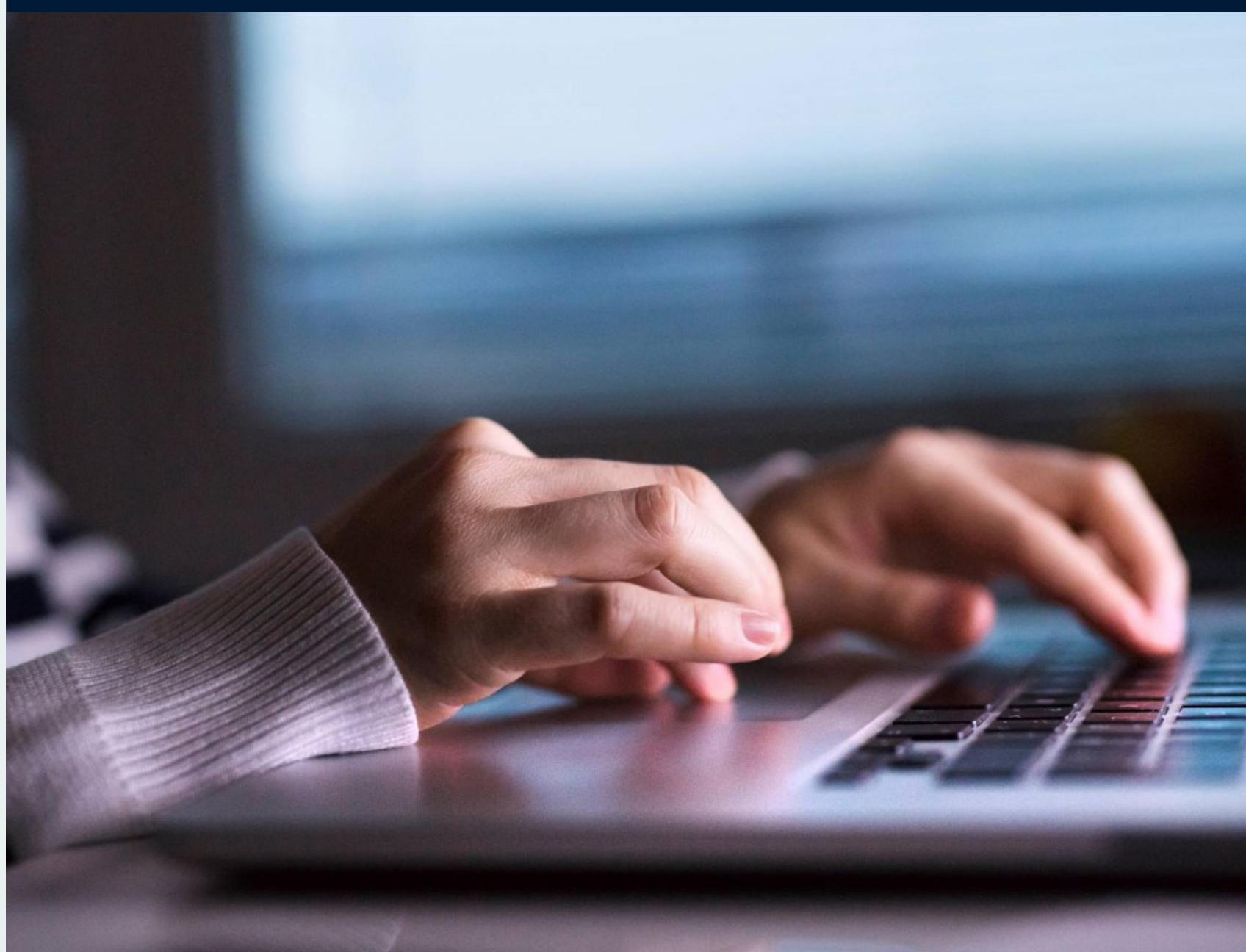
Taking company property from our facilities without permission or intentional misstatements regarding registered working hours or reimbursements is viewed as theft or fraud.

### YOUR RESPONSIBILITIES

- You are personally responsible for safeguarding and using TOMRA assets appropriately. You must protect it against waste, loss, damage, abuse, fraud, theft, misappropriation, infringements and other forms of misuse. Be alert to the risk of theft.
- You must not unlawfully conceal, alter or destroy documents.
- Reimbursement should be asked only for reasonable and approved business expenses.
- Ensure that documents used to obtain company funds and property are accurate and complete. This includes time sheets, invoices, benefit claims and travel and expense reimbursement reports and underlying documentation. Inaccurate or unsubstantiated records may be treated as fraud.
- You must respect the assets of others.



## IT & Electronic Communications



TOMRA supplies you with IT and electronic communications so that you can conduct your work in a secure and compliant manner. It includes hardware, software and all data that is processed using these.

The use of our IT systems must be based on business needs. Information produced and stored on our IT systems is TOMRA's property and may be accessed in accordance with applicable law.

### YOUR RESPONSIBILITIES

- You must comply with TOMRA IT security requirements and policies.
- You must not share your TOMRA IT login details with others.
- You must exercise good judgment when using electronic communication and information systems.
- You must keep your personal use of TOMRA IT and electronic communications, including social media use, occasional and brief and not use the TOMRA name or brand in personal emails.
- You must not use personal email accounts for work communications, unless you are authorised to do so by your line manager.
- You must work to protect the sensitive information stored on TOMRA's electronic systems.
- Never use our IT systems to perform illegal or unethical activities, including downloading or sending offensive material.
- Respect computer software copyrights and comply with the terms and conditions of software licences.



## Data Privacy



TOMRA recognizes the fundamental importance of privacy for all individuals and strives to ensure that all interactions with our company are protected and handled in a way that meets or exceeds all legal requirements. We respect the privacy rights of our staff, customers, suppliers and business partners, and are committed to managing personal data in a professional, lawful and ethical way.

Personal data is broadly defined as any information relating to an identified or identifiable individual such as name and contact details, as well as performance reviews, and salary information. More private information, such as race or ethnic origin, health data, sexual orientation, criminal behaviour or trade union membership is sensitive personal data and subject to more stringent requirements.

We may only process personal data for legitimate purposes and the data must be accurate and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. When it is to be transferred to third parties, it must be appropriately safeguarded.

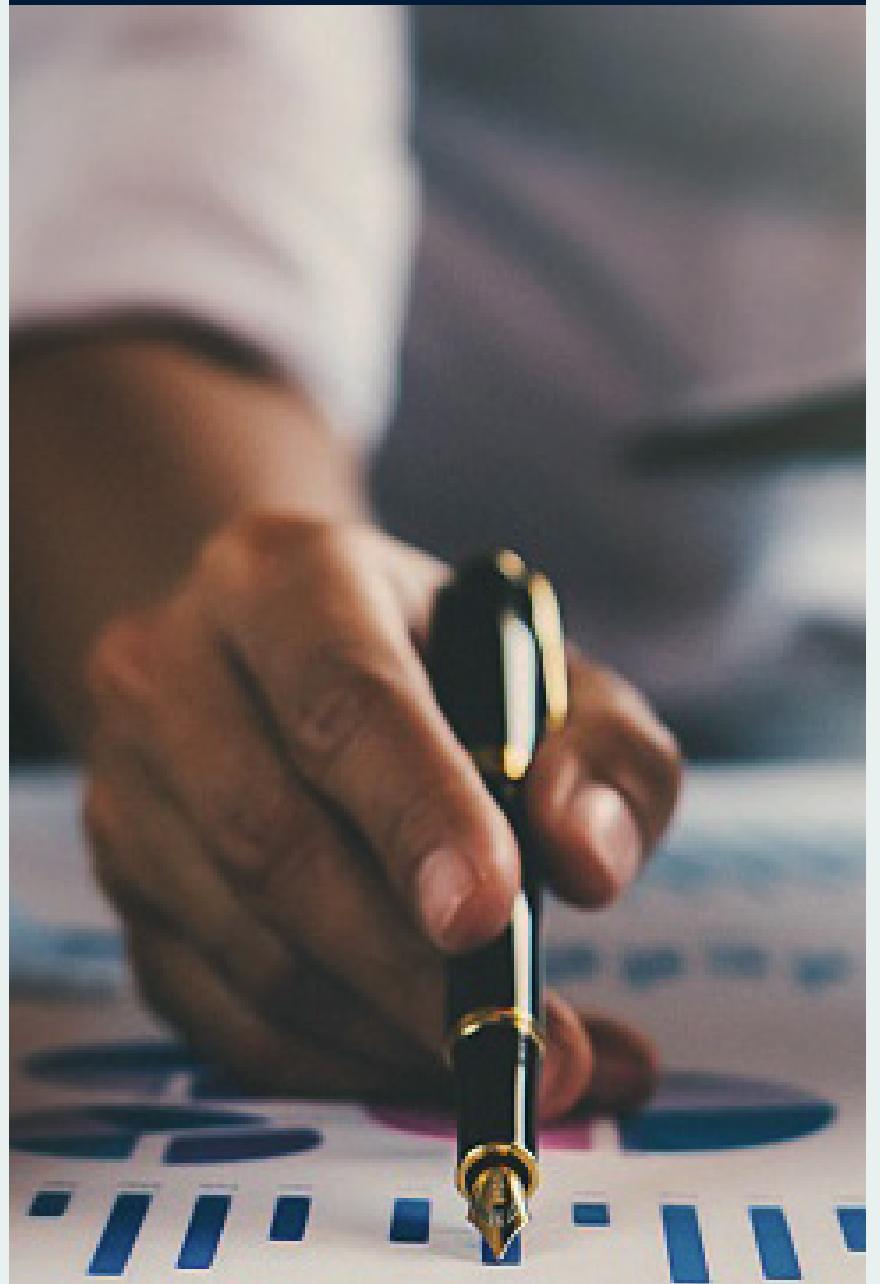
If we do not comply with these requirements, we risk causing harm to individuals, being ordered to cease the processing, and could face fines or litigation. We are also putting TOMRA's reputation at risk.

### YOUR RESPONSIBILITIES

- 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 shall not collect, process or use personal data without authorization (confidentiality). This undertaking shall continue to be valid after termination of their employment.
- You must only process personal data for specific, defined and legitimate purposes.
- You must ensure that personal data in your possession is kept up to date and disposed of when no longer required.
- You must always protect personal data and prevent accidental disclosure.
- If you are not sure whether you need consent or how to protect personal data, always seek advice from the Group IT Compliance Manager.
- You must follow our Data Privacy policy and requirements for processing and transfer of personal data as set forth in TOMRA Group Binding Corporate Rules (BCR).



## Intellectual Property



Intellectual property rights (IPR) such as patents, trade secrets, trademarks, copyrights and designs are valuable TOMRA assets. These intangible assets must be appropriately managed and protected. Generally, TOMRA owns all new intellectual property created by TOMRA employees.

TOMRA's general policy of openness and transparency shall not prevent appropriate protection of information that may be of value to TOMRA's business interests.

Information other than general business knowledge and work experience that becomes known to you in connection with performance of your work shall be regarded as confidential and treated as such. Of relevance are the rules against utilizing confidential information for personal gain for yourself or others. It is equally important that we respect, and avoid infringing, the Intellectual Property (IP) rights of others. Not doing so risks damage to our business and reputation and may impact our ability or licence to operate. All employees must follow the TOMRA Group IPR Policy.

### YOUR RESPONSIBILITIES

- You must use TOMRA's brands and trademarks appropriately, following the Brand Standards.
- You must not disclose TOMRA's confidential information outside TOMRA without permission or an appropriate written agreement, and you must make a record of the information provided under the agreement.
- Classify, label, store and share all TOMRA data, information and documents in accordance with TOMRA classification guidelines and ensure that access to information and

documents is granted only to individuals with a legitimate need.

- Do not take, access, provide access to, or use any of TOMRA's proprietary information or other IP without authorization after leaving TOMRA.
- 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.
- If you are responsible for introducing new brands in a market or new proprietary technology, you must first consult to mitigate the risk of TOMRA infringing IP rights of others.
- If you notice any potential infringements of third party IP rights by TOMRA you should notify your manager, or TOMRA IPR representative. Such notification shall only identify the facts and shall not include any opinion on the validity of any potential IP infringement issues.
- If you notice that a third party is infringing or misusing TOMRA IP rights, for example by passing on documents containing confidential, it is your duty to speak up.
- If you are involved with technology development, you must inform your manager of any new technical solutions you create using the TOMRA Disclosure of Invention form.
- You must ensure suitable contractual agreements are in place before there is a collaboration with any external third parties. Such agreements must be in line with the TOMRA Group IPR Policy and respective TOMRA IPR strategies.



## Maintaining Records



As an industry leader and public company, TOMRA has a responsibility to communicate timely, completely and accurately with our stakeholders, government regulators and the public in all company dealings. All our records shall be prepared in accordance with applicable laws, regulations and relevant accounting standards.

As a TOMRA employee, you have the responsibility to maintain necessary records of the company's business and business relations. No false, misleading or artificial entries may be made in TOMRA's books and records. All transactions must be fully and completely documented and recorded in TOMRA's accounting records.

Employees, particularly our senior executives and financial officers, are expected to exercise the highest standard of care in preparing such materials. No information may be concealed from the internal auditors or the independent auditors.

### YOUR RESPONSIBILITIES

- Make sure you are familiar with and comply with our information management and security classification system when handling company information.
- The data and information you submit in our books, records and public communication must be accurate, complete and reliable. This includes both financial and non-financial information, such as environmental data and operations reports.



## Insider Trading



As an employee of the TOMRA Group you may receive inside information related to the company.

Inside information is knowledge held within the Group that is precise, not generally available and which, if it did become available, would be likely to have a significant effect on the market price of shares or other securities of TOMRA or any other listed company.

Examples of information that could be classified as inside information are financial statements that have not yet been published, information on mergers or acquisitions, large divestments, information on new share issuance, changes in dividend policies, cases where major lawsuits have been filed against the company or notifications of such lawsuits, or changes in executive management.

If you receive such inside information, you will be subject to certain rules pursuant to the Norwegian Securities Trading Act, including:

- the prohibition against misuse of inside information
- the prohibition against giving advice
- the duty of confidentiality
- the duty to show due care when handling inside information

Dealing based on inside information includes directly trading in securities and passing inside information on to another person who uses that inside information to trade in shares or other securities. Insider dealing is both illegal and unfair.

## YOUR RESPONSIBILITIES

- You must not trade in financial instruments or related to financial instruments issued by TOMRA when you have inside information or incite others to trade.
- You shall not give advice to others to purchase, sell, exchange or subscribe for financial instruments issued by TOMRA if you have inside information.
- If you are considered a primary insider, you must not undertake any trading transactions without first obtaining clearance.
- If you come across inside information about any other publicly listed company in the course of your work, you must not deal in that company's shares or securities until any inside information you have becomes public.
- You must also not share inside information with anyone unless you are authorized to do so.
- Be familiar with insider trading policies and requirements.
- If you have any questions as to whether the information you possess qualifies as inside information, you should consult the Investor Relations Officer.



## Anti-Bribery & Corruption



Corruption undermines legitimate business, distorts competition and exposes companies and individuals to risk.

At TOMRA, we build relationships based on trust, and we are determined to maintain and enhance our reputation. Even unsubstantiated claims of bribery and corruption may damage TOMRA's reputation.

We have zero tolerance for corruption in any form, including bribery, facilitation payments and trading in influence. We must be very careful when dealing with conflicts of interest, gifts, hospitality and expenses, since they may constitute or lead to corruption depending on the circumstances.

Since TOMRA's headquarters are in Norway, all employees and business partners - who act on TOMRA's behalf - must abide by Norwegian anti-corruption law as well as local laws. The Norwegian anti-corruption law encompasses both the private and public sector.

Dealing with government officials can pose a greater bribery risk, so you must follow the mandatory requirements.

### YOUR RESPONSIBILITIES

- You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or gaining a business advantage. You must not allow anybody else to do so on your behalf.
- You must not make facilitation payments. If a facilitation payment has been requested, you must immediately report it to your line manager or the Group Compliance Officer.
- Know who you are doing business with by conducting the appropriate due diligence. Especially when dealing with agents/consultants/distributors acting on TOMRA's behalf.
- Participate in required anti-corruption training and engagements. Understand the risks you face in your work.
- Follow corporate and business guidelines regarding gifts & entertainment and other business courtesies. Remember that providing gifts, entertainment or anything else of value to government employees is highly regulated and often prohibited.
- You must report corrupt behaviour. Turning a blind eye to suspicions of bribery and corruption can result in liability for TOMRA and for individuals.



## Gifts & Hospitality (G&H)



Relationship with our business partners can be built and strengthened through legitimate networking and social interaction. However, giving or accepting gifts and hospitality may be regarded as corruption in certain situations.

It is important to do the right thing – and to be seen to do it. For this reason, we discourage our staff from accepting gifts and hospitality from business partners, or offering to them, especially those you would not be comfortable telling your manager, colleagues, family or the public that you had offered or accepted.

In particular, you should never allow gifts and hospitality, either offered or received, to influence business decisions or give other people a reason to suspect there might be an influence. It should not be excessive or frequent.

You shall not, to obtain or retain business or other advantages in the conduct of business, offer, promise or give any undue advantage to a public official (or a third party) to make the official act or refrain from acting in relation to the performance of her/his official duties.

### YOUR RESPONSIBILITIES

- You must not, either directly or indirectly, offer, give, seek or accept:
  - illegal or inappropriate G&H, cash or cash equivalents (including per diems unless contractually agreed), vehicles, personal services, or loans in connection with TOMRA business;
  - G&H where the business partner is absent;
  - during periods when important business decisions are being made and contracts are to be signed;
  - G&H that exceed prescribed value limits, unless the line manager and other required approvals have been obtained.
- When offering G&H to a government official, you must follow the internal policy and guidelines and not offer or pay for: additional days of travel to tourist destinations or private visits, family members/guests.
- When in doubt as to whether something is acceptable or appropriate, please seek guidance from your line manager or the Group Compliance Officer.



## Conflict of Interest (Col)



Conflicts of interest (COI) 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 TOMRA. An actual, potential or perceived conflict of interest may jeopardise your reputation as well as TOMRA's.

TOMRA respects your right to manage your personal affairs and investment, however, you must not let any decisions you make at TOMRA be influenced by personal considerations such as relationships or outside interests of yourself, family or friends.

Provided that no actual, potential or perceived COI would result, you may acquire interests in other businesses and be active in your own time in the community, government, educational and other non-profit organisations. However, in any such case, you must comply with all relevant laws, regulations and TOMRA policies. If there is any doubt, you must raise your concern with your line manager or the Group Compliance Officer or Human Resources before you start a new activity.

### YOUR RESPONSIBILITIES

- You must not let any decisions you make at TOMRA be influenced by personal considerations such as relationships or outside interests of yourself, family or friends.
- Withdraw from decision-making that creates an actual, potential or perceived COI.
- If you are not sure whether such a conflict exists, you must consult your line manager, the Group Compliance Officer or Human Resources.



## Competition Law & Antitrust



TOMRA operates in full compliance with all applicable competition laws and regulations, which protect free enterprise and fair competition.

We expect TOMRA staff to play their part in combating illegal practices. These include price fixing, market sharing, output limitation or bid rigging, abuse of market power and any anticompetitive or monopoly practices. Dominant firms have a special responsibility to not further distort competition, such as for instance fidelity rebates and predatory pricing.

Be vigilant in not entering into any kind of inappropriate conversation, agreement with our competitors or prevent them from fair competition.

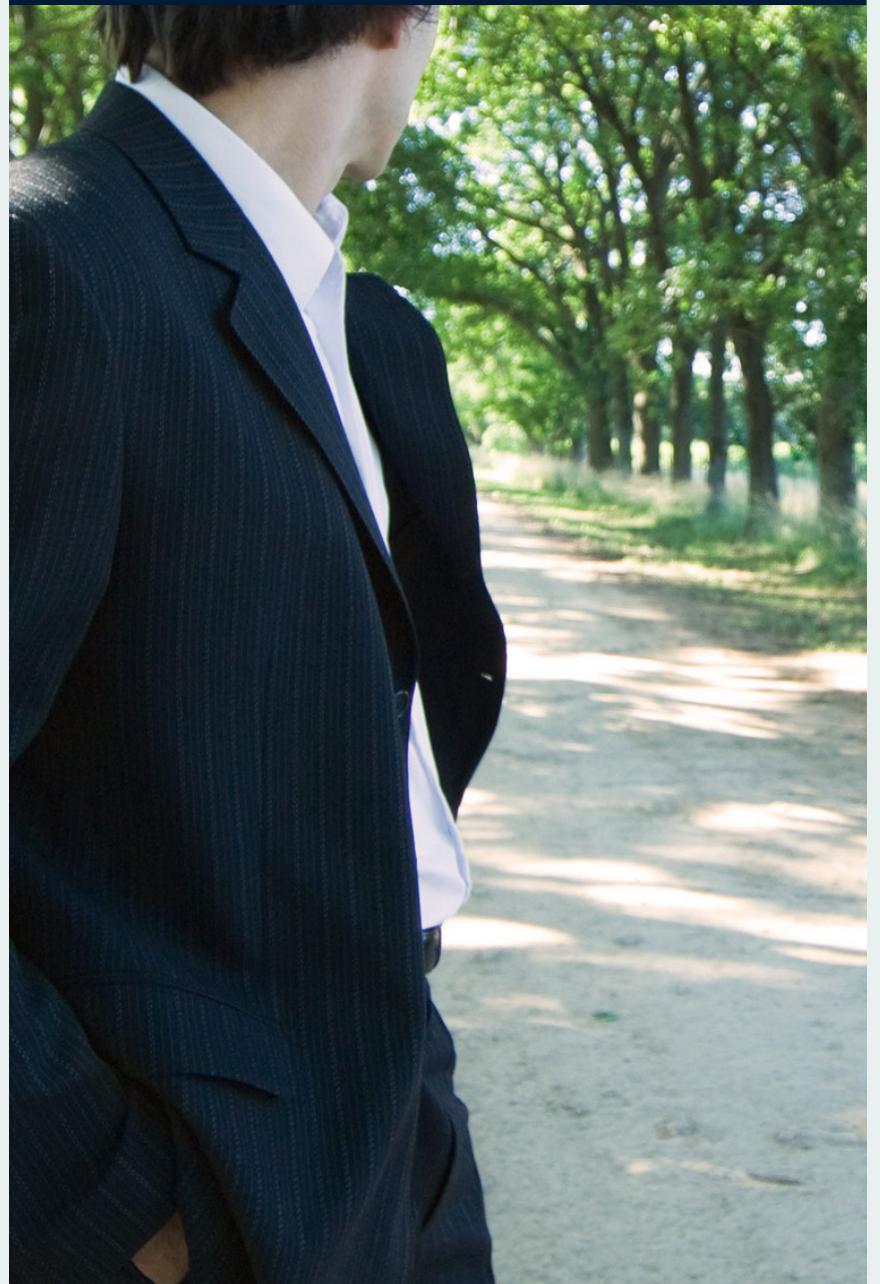
### YOUR RESPONSIBILITIES

- You must not share or receive competitively sensitive information without a lawful reason.
- You must follow the principle that all decisions on TOMRA's pricing, production, customers and markets must be made by TOMRA alone.
- Do not impose exclusive supply or similar obligations on customers.
- Be clear and concise when drafting or negotiating agreements - do not use general formulations or ambiguous wording.
- You must not attempt to set a minimum or any resale price for an independent dealer, distributor or reseller.

- You must not share non-public commercially confidential information or discuss with competitors any matter on which competitors are not legally permitted to agree.
- You must not agree with competitors, even informally, to: fix price or any element of price, such as discounts, surcharges or credit terms; reduce or stabilise production, capacity or output; divide up customers, accounts or markets.
- You must not agree with others to boycott any customer or supplier except in connection with internationally imposed government sanctions.
- 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 Group Compliance Officer.
- It is your responsibility as an employee to familiarize yourself with relevant competition laws and regulations, TOMRAS's policies and requirements, as well as risks, related to your work.
- You must complete all training and engagements in which you are required to take.
- You must speak up if you know of any potentially anti-competitive practices or if you are uncertain whether practices are legal.



## 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, including terrorism, drug trafficking, corruption and tax evasion.

All companies are at risk of being exploited in this way – and we must be on our guard to help protect our reputation and ensure we comply with the law.

### YOUR RESPONSIBILITIES

- You must follow any due diligence requirement specified by TOMRA so that we know who we are doing business with.
- You must ensure that your business transactions on behalf of TOMRA do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime.
- You must not knowingly deal with criminals, suspected criminals or the proceeds of crime.
- Be attentive to:
  - Attempts to make payment in cash or otherwise involving unusual banking arrangements.
  - Orders, purchases or payments that are unusual or inconsistent with a customer's trade or business.
  - Unusual fund transfers to or from countries unrelated to the transaction.
  - Transactions that might have been structured to evade recording or reporting requirements.
- If you have knowledge or suspicion that a counterparty is involved in money laundering in connection with its transaction with TOMRA, you must promptly report it to your manager or the Group Compliance Officer.
- To meet legal requirements, do not let the counterparty know of your suspicions. You must not falsify, conceal, destroy or dispose of relevant documents.



## Trade Compliance



Like any other global company, we must comply with all applicable national and international trade compliance regulations. Countries can impose various economic sanctions restrictions targeting business dealings with specific countries, economic sectors, entities or individuals of concern.

Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international sanctions and restrictive trade practices.

Failure to comply with the applicable laws could lead to fines, delays, seizure of goods or loss of TOMRA's export or import privileges, as well as damage to TOMRA's reputation or imprisonment for individuals. It is crucial that you are aware of the requirements and how they apply to your role. By doing so, you are helping the company to continue doing business internationally.

### YOUR RESPONSIBILITIES

- Screen your business partners, suppliers and other parties against relevant restricted parties' lists.
- Be mindful that both sanctions and export control regulations are complex and subject to frequent changes. Stay updated on the rules applicable to your business activity.
- Obtain and comply with necessary governmental licences where cross-border export or import activity involves restricted items, technology or software. You must obtain, retain and communicate correct customs and export control classification on all goods and software moved internationally.
- You must stop and seek assistance from the Group Compliance Officer when your dealings with a third party identify suspicious facts or "red flags." You must also stop and seek advice when confronted with a restrictive trade request.





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