



TOMRA

# Code of Conduct

May 2023

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

## Contents

The way we do things around here	3	Information Security	11
Message from our CEO	3	Secure information processing	11
Our vision, mission, culture and values	4	IT resources	11
Who is affected by our Code of Conduct?	5	Data privacy	12
Responsibilities	6	Intellectual property	13
Your responsibilities	6	Maintaining records	13
Responsibilities for leaders	6	Managing third party interactions	14
What happens if I violate the Code?	7	Anti-bribery & corruption	14
Asking questions and reporting concerns	7	Gifts & hospitality (G&H)	15
Rights and work environment	8	Conflict of interest (Col)	15
Health, Safety, and Environment	8	Insider trading	16
Equal opportunity	8	Competition law & anti-trust	17
Human rights	9	Anti-money laundering	18
Harrassment	9	Trade compliance	18
Protection of assets	10		

The way we do things  
around here

## 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 more sustainable world. 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 always uphold and honor our values, 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 as well as our values. Our global footprint also means that we are collaborating with suppliers, customers and partners with diverse backgrounds and cultures. It is particularly important that we understand and embrace this diversity, while holding true to our company values and abide by the Code of Conduct.

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, promoting human rights issues, and contributing to sustainable economic development.

Our Code of Conduct sets forth the responsibilities that all of us share in conducting 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 adhere to our Code of Conduct. By following this Code, you are doing your part to maintain TOMRA as a highly reputable business that is leading the resource revolution with passion, innovation, and responsibility.

## 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**




We believe in creatively and collectively solving today’s challenges to create a better future.




**Passion**



We believe people make the greatest impact when they care deeply about what they do.



**Responsibility**



We believe that each one of us is responsible for making a difference for our customers, people and planet.

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

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

Contract staff working for a company at TOMRA 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.



## Your responsibilities

The Code of Conduct is for you. It sets the boundaries within which all TOMRA staff and representatives 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 up to date on 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 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 yourself to following the Code in the work you do every day.

## Responsibilities for leaders

We believe in flat organizations and an open dialogue – i.e., leadership is not about positions; it is about behavior.

Our leaders are committed to promoting our ethical standards and function 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.
- Speak up if you are told of a possible violation of the Code, it is your duty. You may refer it to a Compliance officer.
- Ensure you keep all reported concerns confidential.
- Be consistent when enforcing our standards and holding people accountable for their behavior 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 local 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, a Compliance officer, or a People & Organization representative. Alternatively, you can report your concern on the [speak up notification portal](#). 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 speak up. 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, and Environment

At TOMRA we are passionate about leading the resource revolution, and we are committed to providing a safe place for our people, our customer, and the environment in which we operate. We strive to promote a working environment which embraces cultural diversity, inclusiveness, and wellbeing through our safe people. We shape an environment for our people to live their best lives and get home safely every day. 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, and Environment (HSE), designed to ensure compliance with the law, standards, and procedures, achieving continuous performance improvement.

## Your responsibilities

- Act to contribute to a healthy, safe, and secure work environment. HSE is everyone's responsibility.
- 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 HSE concerns at your site.
- Question unsafe or improper operations and intervene if necessary to address them.
- Report and correctly act on a potential HSE incident as soon as you become aware of it.

## Equal opportunity

We passionately believe that diversity, equity, and inclusion (DEI) make 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 ethnicity, color, 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 base all employee-related decisions, regarding for instance recruitment, training, compensation, and promotion, on business needs, job requirements, and individual qualifications including potential. 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

- Base any employment decisions, including hiring, evaluation, promotion, training, development, discipline, compensation, and termination, on business needs, job requirements, and individual qualifications including potential.
- Understand the value of DEI and do 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 labor 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 of relevant human rights risks in our business and those of our external partners.
- Ensure that all work complies with TOMRA commitments to human and labor rights.
- Oppose all forms of human trafficking, forced labor and illicit forms of child labor in our operations or value chain.
- Speak up if you know of or suspect any potential human or labor rights violations relating to our business, it is your duty to speak up to your manager, People & Organization, or a Compliance Officer.

## Harrassment

TOMRA will not tolerate any form of harassment. We will not tolerate any action, conduct or behavior 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 psychologically safe working environment.
- Treat others always with respect and avoid situations that may be perceived as inappropriate.
- Deliver feedback, criticism, and challenge always in an appropriate and respectful manner. Be aware of cultural sensitivities and differences.
- Never engage in physical or verbal intimidation or humiliation, inappropriate jokes, or comments, or display disrespectful material.
- Speak up if you experience or witness any kind of harassment. You can always contact your line manager, People & Organization, or a 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

- Safeguard and use TOMRA assets appropriately. Protect our assets against waste, loss, damage, abuse, fraud, theft, misappropriation, infringements, and other forms of misuse. Be alert to the risk of theft.
- Do not unlawfully conceal, alter, or destroy documents.
- Ask only for reimbursement 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.
- Respect the assets of others.



## Secure information processing

The information security in TOMRA shall support the business operations, trust, and reputation, by preventing and limiting the consequences of unwanted security incidents

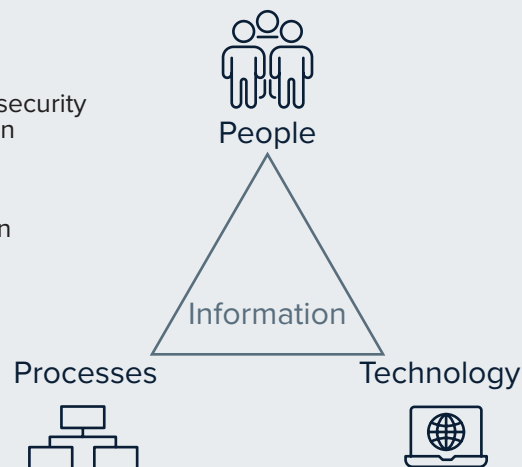
Information security affects all business processes at TOMRA and is a prerequisite for ensuring that we deliver safe solutions to the marketplace that are trusted by our customers, employees, and other stakeholders.

Sufficient safeguards of information shall be ensured by:

- People: employees and contractors who enable a positive security culture through their expertise, engagement, and proactive attitude.
- Processes: routines that provide an established security framework which can be easily understood and followed.
- Technology: infrastructure which is established and used in accordance with TOMRA IT security policies.

## Your responsibilities

- Ensure that you have sufficient security competence relative to your own responsibilities.
- Comply with TOMRA Information security policies.



## IT resources

TOMRA supplies the necessary equipment and access to information to conduct our work in a secure and compliant manner. These resources include the hardware, software and all data required to deliver on our goals.

Information produced and stored on our systems and network is TOMRA's property and may only be accessed in accordance with applicable laws and internal policies.

## Your responsibilities

- Comply with TOMRA IT security requirements and policies. Exercise good judgment when using electronic communication and information systems.
- Keep your personal use of TOMRA IT and electronic communications, including social media use, occasional and brief.
- Do not use personal email accounts for work communications, unless you are authorized to do so by your line manager. Do not use the TOMRA name or brand in personal emails.
- 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 licenses. Do not share your TOMRA IT login details with others.

## 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 managed 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 ethnic origin, health data, sexual orientation, criminal behavior, or trade union membership is sensitive personal data and subject to more stringent requirements.

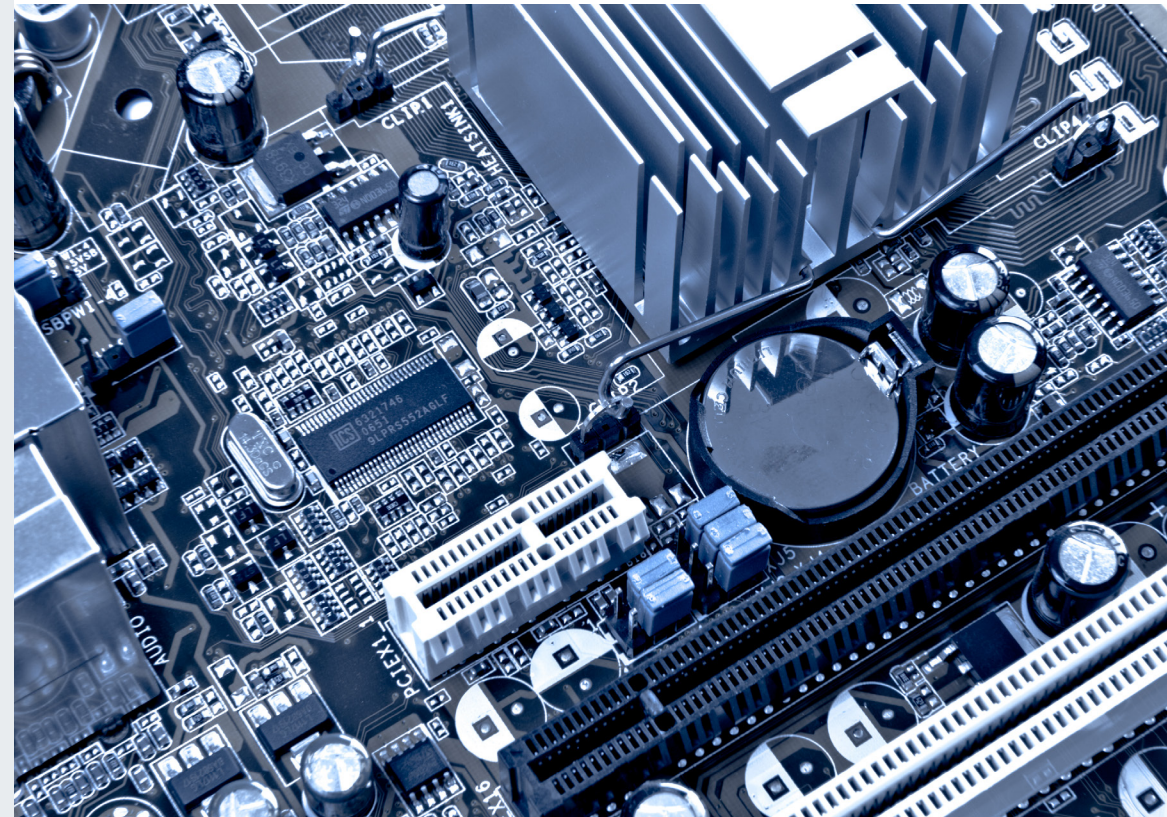
We may only process personal data for legitimate purposes and the data must be accurate and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. When it is to be transferred to third parties, it must be appropriately safeguarded.

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

- Collect, use, and store personal data only in compliance with applicable laws, data privacy principles and TOMRA's policies and guidelines.
- Identify any privacy risks before collecting, using, retaining, or disclosing personal data, such as in a new IT system, project, or marketing initiative.

- Ensure personal data is processed only for specific, defined, and legitimate purposes, using the minimum personal data necessary for processing.
- Ensure that personal data is kept up to date and disposed of when no longer required.
- Protect personal data and prevent accidental disclosure.
- Seek advice when not sure whether you need consent or how to protect personal data
- Report promptly if you suspect a data breach involving personal data.



## 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 the 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 license to operate. All employees must follow the TOMRA Group IPR Policy.

## Your responsibilities

- Use TOMRA's brands and trademarks appropriately, following the Brand Standards.
- Do 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.
- Do 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.



- Do not misuse confidential information of a third party.
- Consult first with an IPR representative if you are responsible for introducing new brands in a market or new proprietary technology. This is to mitigate the risk of TOMRA infringing IP rights of others.
- Notify your manager, or TOMRA IPR representative if you notice any potential infringements of third party IP rights by TOMRA. Such notification shall only identify the facts and shall not include any opinion on the validity of any potential IP infringement issues.
- Speak up if you notice that a third party is infringing or misusing TOMRA IP rights, for example by passing on documents containing confidential information. It is your duty.

## 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.
- Make sure the data and information you submit in our books, records and public communication is accurate, complete, and reliable. This includes both financial and non-financial information, such as environmental data and operations reports.

# Managing third party interactions

## 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, fraud, 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 and international laws. The Norwegian anticorruption 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

- Do not offer, pay, make, seek, or accept a personal payment, gift, or favor in return for favorable treatment or gaining a business advantage. You must not allow anybody else to do so on your behalf.
- Do 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.
- Report corrupt behavior. Ignoring 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 set a clear policy for our staff when and under what circumstances accepting gifts and hospitality from business partners, or offering to them, are acceptable or not. Transparency is vital to protect yourself and the company.

In particular, you should never allow gifts and hospitality (G&H), 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 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

- Do not, either directly or indirectly, offer, give, seek, or accept:
  - o 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;
  - o G&H where the business partner is absent;
  - o during periods when important business decisions are being made and contracts are to be signed;
  - o G&H that exceed prescribed value limits unless the line manager and other required approvals have been obtained.

- Follow internal policy and guidelines when offering G&H to a government official. Do not offer or pay for: additional days of travel to tourist destinations or private visits, family members/guests.
- Seek guidance from your line manager or a Compliance Officer when in doubt as to whether something is acceptable or appropriate.

## 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 jeopardize 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 nonprofit organizations. 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 a Compliance officer or People & Organization before you start a new activity.

### Your responsibilities

- Do 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.
- Consult your line manager, a Compliance officer or People & Organization if you are not sure whether such a conflict exists.

## Insider trading

TOMRA is a publicly listed company. As an employee of TOMRA 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 and EU Market Abuse Regulation, including:

- the prohibition against misuse of inside information.
- the prohibition against giving advice.
- the duty of confidentiality and due care when managing inside information.

Trading 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 trading is both illegal and unfair.

## Your responsibilities

- Do not share inside information with anyone unless you are authorized to do so.
- Do not, directly, or indirectly, trade in securities or related financial instruments issued by TOMRA, give advice, or incite others to do transactions when you have inside information.
- The prohibition applies to written, verbal, or any other kind of advice, it applies even though you do not disclose the inside information and refers to both advice to trade as well as advice to refrain from trade.
- Make yourself familiar with insider trading policies and requirements.
- Consult the Investor Relations Officer if you have any questions as to whether the information you possess qualifies as inside information.



## Competition law & anti-trust

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

- Do not share or receive competitively sensitive information without a lawful reason.
- 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.
- Do not attempt to set a minimum or any resale price for an independent dealer, distributor, or reseller.
- Do not share non-public commercially confidential information or discuss with competitors any matter on which competitors are not legally permitted to agree.
- Do not agree with competitors, even informally, to fix price or any element of price, such as discounts, surcharges, or credit terms; reduce or stabilize production, capacity, or output; divide up customers, accounts, or markets.
- Do not agree with others to boycott any customer or supplier except in connection with internationally imposed government sanctions.
- Leave any industry meetings or other events if competitively sensitive issues arise. Ensure your departure is noted and immediately report the matter to a Compliance officer.
- Make yourself familiar with relevant competition laws and regulations, TOMRA's policies and requirements, as well as risks related to your work.
- Complete all training and engagements which you are required to take.
- 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

- Follow any due diligence requirement specified by TOMRA so that we know who we are doing business with.
- 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.
- Do not knowingly deal with criminals, suspected criminals, or the proceeds of crime.

Be attentive to:

- o Attempts to make payment in cash or otherwise involving unusual banking arrangements.
- o Orders, purchases, or payments that are unusual or inconsistent with a customer's trade or business.
- o Unusual fund transfers to or from countries unrelated to the transaction.
- o Transactions that might have been structured to evade recording or reporting requirements.
- Report promptly to your manager or a Compliance officer if you have knowledge or suspicion that a counterparty participates in money laundering



in connection with its transaction with TOMRA.

- Do not let the counterparty know of your suspicions to meet legal requirements, 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 & services, 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 licenses 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.
- Stop and seek assistance from a 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.



TOMRA

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