

Swagelok Norway and Swagelok Sweden Code of Conduct

Description

We have processes in place to ensure that we work actively with our goals. We will achieve this by strengthening our competence in all stages by offering training, exchanging experiences, and being transparent regarding each associate's tasks and responsibilities. Swagelok Norway and Swagelok Sweden's associates and their unique/individual qualities are our most important resource for ensuring the continuous improvement of all our processes.

Quality Policy

Provide the best solution possible to help customers succeed and keep making it better.

With our shared strategy, vision, mission, and values, Swagelok Norway and Swagelok Sweden will embrace the best of our cultures and the variety of talent, background, knowledge, and experience that each of us contributes to create the strongest team possible and focus on:

Greater Creativity and Innovation

Diverse methods of problem solving and unique perspectives will spark fresh ideas.

Increased Capabilities

We will have greater potential to understand customers' needs and the ability to fulfill them with a broader warehouse of resources and competencies.

Operational Efficiency

We will leverage the best elements of the business processes we have each developed over our companies' histories to optimize our collective operations.

New Opportunities

Our collection of skills and experiences will allow us to be more versatile and connect with new and unconventional customers.

Workplace Environment Policy

Swagelok Norway and Swagelok Sweden shall provide employees with safe and healthy working conditions. The following shall be available at all times: potable drinking water, adequate sanitation, fire exits and essential safety equipment, access to emergency medical care, and appropriately lit and equipped workstations.

In addition, our facilities shall be constructed and maintained in accordance with the standards set by applicable codes and ordinances. We provide workers with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal.

Environmental Policy

Swagelok Norway and Swagelok Sweden are committed to protecting and preserving the environment

by carrying out sustainable resource management. We continually work to minimize our environmental impact of our operations.

In our work for continuous improvement, and in the efforts to reduce the use of energy, natural resources, waste materials, and greenhouse gasses, our focus will be in utilizing renewable solutions.

Swagelok Norway and Swagelok Sweden shall comply with all current, applicable

environmental rules, regulations and laws. Swagelok Norway and Swagelok

Sweden commits to:

1. Obtain and comply with all required environmental permits and regulations.
2. Reduce, control and/or eliminate waste and pollution at the source.
3. Be energy efficient in all aspects of our operations.
4. Identify, manage, and handle regulated substances in accordance with laws and regulations.

Ethical Guidelines

Swagelok Norway and Swagelok Sweden's Commitment

In its activities, Swagelok Norway and Swagelok Sweden will comply with applicable laws and regulations and act in an ethical, sustainable, and socially responsible manner and respect local and internationally recognized human rights.

Description of Ethical Guidelines and Behavior for Swagelok Norway and Swagelok Sweden Associates

When dealing with ethical issues, it is important to follow a few simple rules.

- Ensure that our actions are within the law and well within Swagelok Norway and Swagelok Sweden's own ethical requirements.
- Think critically when it comes to ethical issues. If an associate is in doubt, he or she should raise the issue with his or her supervisor.
- Spend enough time on handling difficult decisions. Wrong decisions are often made when you have not thought things through properly, and the individual allows themselves to be pressured to make an ill-considered decision.

Swagelok Norway and Swagelok Sweden must be known for working in accordance with high ethical standards. Violations of laws and ethical requirements are a threat to Swagelok Norway and Swagelok Sweden's reputation.

Rules of Business Conduct

Swagelok Norway and Swagelok Sweden's business information will be communicated precisely and in detail, both internally and externally. All accounting information must be correct, registered and reproduced in accordance with laws and regulations, including relevant accounting standards. Any intentional act that results in an incorrect presentation in the accounting material will be treated as fraud.

Swagelok Norway and Swagelok Sweden shall compete in an honest and ethically sound manner within the framework of antitrust laws and competition rules. This applies in relation to competitors as well as to customers and suppliers.

Corruption includes bribery, extortion and undue influence trading. Corruption undermines legal business activity, leads to distortions of competition, destroys the company's reputation, and exposes companies and individuals to risk. Swagelok Norway and Swagelok Sweden oppose all forms of corruption and will work actively to ensure that this does not occur in our business activities.

Bribery occurs when attempts are made to influence someone in the performance of their duties, by giving them an unfair advantage. Improper influence trading occurs when an unfair advantage is given to someone to influence the performance of third-party obligations. Such an unfair advantage can occur in several forms, such as cash, items, credits, discounts, travel, accommodation, or services.

Swagelok Norway and Swagelok Sweden shall show respect for all individuals and work actively to ensure a good working environment that is characterized by equality and diversity. Swagelok Norway and Swagelok Sweden do not accept any form of discrimination against its associates or others involved in our activities. However, it can be legal and justifiable to use positive discrimination to achieve equality and diversity. Discrimination includes any unfair treatment, exclusion, or preference on the basis of race, gender, age, disability, sexual orientation, religion, political position, national or ethnic origin or similar circumstances, which leads to the setting aside or compromise of the principle of equality.

The use of child labor is strictly prohibited. Child labor refers to work that is mentally, physically, socially, morally dangerous, or harmful for children, or improperly interferes with their schooling needs.

Rules of Personal Conduct

Swagelok Norway and Swagelok Sweden demand high ethical standards from all who act on behalf of Swagelok Norway and Swagelok Sweden. Associates must comply with applicable laws and regulations and perform their duties in accordance with the requirements and standards applicable in Swagelok Norway and Swagelok Sweden. It is expected that associates will treat everyone they interact with through their work or through work-related activities with courtesy and respect. Associates must refrain from conduct that may adversely affect colleagues, the work environment or Swagelok Norway and Swagelok Sweden. This includes any form of harassment, discrimination, or other behavior that colleagues or business associates may perceive as threatening or degrading. Associates shall not behave in a way that may violate local customs or local culture.

Confidentiality

Everyone who works for Swagelok Norway and Swagelok Sweden is subject to a duty of confidentiality. Confidentiality shall prevent unauthorized persons from gaining access to information that may harm Swagelok Norway and Swagelok Sweden's business or reputation. This duty must also protect the privacy and integrity of the associates. Careful consideration must therefore be given to how, where and with whom Swagelok Norway and Swagelok Sweden-related matters are discussed to ensure that persons without authorization do not have access to sensitive information regarding security, individuals, commercial, technical, or contractual matters and information that is protected by law. The associate must comply with the requirements for classification of information for confidential processing of such information, except when permission has been granted to disseminate the information, or when the law requires such dissemination. The duty of confidentiality continues to apply after the employment relationship has ended, or after an assignment has been completed.

Conflict of Interest

Swagelok Norway and Swagelok Sweden respect the privacy of every employee in the conduct of his/her personal affairs. However, all employees have a duty to ensure that their personal and financial interests do not conflict with, or appear to conflict with, their duties on behalf of Swagelok Norway and Swagelok Sweden. Employees must be able to perform their duties and exercise their judgements on behalf of Swagelok Norway and Swagelok Sweden without impairment by virtue of an outside or personal influence.

Gifts, Hospitality, and Expenses

Associates shall not, directly, or indirectly, accept gifts, with the exception of promotional items of minimal value, which usually have a company logo. Associates who act on behalf of Swagelok Norway and Swagelok Sweden in their dealings with customers, suppliers and other parties may offer to pay for meals or entertainment that have a clear business purpose for Swagelok Norway and Swagelok Sweden. The cost of such hospitality must be kept within reasonable limits. Associates may not offer or consent to pay for gifts, hospitality or other expenses that would violate these principles. All associates should carefully consider the questions regarding hospitality before they invite or respond to an invitation.

Information and IT Systems

The associate's use of information, IT systems and especially internet services, must be governed by the company's needs and not by personal interests. Information produced and stored on the computer and in the cloud is considered the company's property. Swagelok Norway and Swagelok Sweden therefore reserve the right to access all information of this kind, where this is not limited by law or other agreements. The associate is responsible for taking care of electronic files and archives in a proper manner.

Private use is only allowed to a limited extent. Information that may be considered illegal, offensive, or inappropriate must not be processed, downloaded, stored or forwarded. All downloading, storage or distribution that violates copyright laws or regulations is prohibited. Any use of software that violates copyright laws or regulations is prohibited.

Drugs

Swagelok Norway and Swagelok Sweden is a drug-free workplace. Consequently, you should not be under the influence of alcohol or other drugs while working for Swagelok Norway and Swagelok Sweden.

Limited quantities of alcohol may still be served when local customs and special occasions make this appropriate, provided that the intake is not combined with the operation of machinery, driving or other activities that are not compatible with the use of alcohol. This also applies when you are working on assignments or business trips for Swagelok Norway and Swagelok Sweden. No one should use, nor encourage others to use, drugs in a way that could damage the reputation of the user, Swagelok Norway and Swagelok Sweden, or any business associates.

Implementation and Follow-Up

Personal Responsibility

Associates shall ensure that they are aware of and perform their duties in accordance with the requirements set out in this document, and applicable laws and regulations.

Management Responsibility

Managers shall ensure that activities within their area of responsibility are performed in accordance with the requirements set forth in this document. Managers are responsible for communicating the requirements and giving advice regarding the interpretation and application of the regulations.

Handling of Cases of Doubt and Breaches of Regulations

If the associate encounters issues that involve ethical doubts or breaches of Swagelok Norway and Swagelok Sweden's code of conduct, these matters must be reported immediately. The associate can report the conditions through the usual channels; to the superior, to the superior's superior or to the safety representative. Swagelok Norway and Swagelok Sweden will not impose sanctions in any form on associates who, in a responsible manner, inform persons in charge, internal units or relevant authorities about possible violations of our ethical guidelines, applicable laws or other reprehensible circumstances in our company.

Consequences of Violations

Violations of Swagelok Norway and Swagelok Sweden's code of conduct or relevant legal provisions may result in disciplinary action, including termination or dismissal, and may be reported to the relevant authorities.