SEC CODE OF CONDUCT AND ETHICS

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Introduction – Statement

Welcome to SEC – a renowned group of temporary employment agencies specializing in providing qualified personnel to leading companies in the offshore construction, FPSO, and Oil & Gas sectors. Since 2010, we have successfully connected ambitious professionals with top industry enterprises.

We are aware that our success is built on the reputation that all SEC employees shape every day through their attitude and actions. **The way we work directly influences our image – both internally and externally. Each of us has a real impact on how our organization is perceived.**

Ethical, responsible, and transparent conduct is the foundation of our operations. In our daily work, we are guided by professionalism, reliability, and prudence. Each of us is responsible for ensuring that our actions reflect the highest ethical standards – because it is consistent behavior aligned with our values that determines our credibility.

We believe that people are the key to success. Trust, mutual respect, and a shared goal enable us to overcome the greatest challenges. As a socially responsible organization, we are committed to respecting human and labor rights, protecting the natural environment, and actively engaging in the life of local communities.

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What is the SEC code of conduct and ethics?

The SEC Code of Conduct and Ethics is a set of principles that defines the expected standards of behavior for all individuals associated with our organization. It serves as an ethical guide, indicating appropriate attitudes and actions aligned with the values we represent. The Code functions as a moral compass, and its detailed provisions are complemented by internal procedures and operational policies.

Who is bound by the code?

The Code applies to all SEC employees, members of the management board, individuals employed by subsidiaries and affiliated companies, as well as all other persons acting on behalf of the SEC Group – including suppliers, subcontractors, and business partners. Compliance with the principles outlined in the Code is a condition for initiating and continuing cooperation with our organization. Each person covered by the Code is required to confirm in writing that they have read and understood its contents.

Commitment to company policies

Every employee is obliged to comply not only with the principles set out in this Code, but also with all company policies and procedures in force, including the Occupational Health and Safety Policy, the Corporate Social Responsibility (CSR) Policy, and the Integrated Management System (IMS) Policy.

How and when to apply the code?

We expect all employees and partners to follow the principles described in the Code in their daily work – regardless of their position, location, or the nature of their duties. These principles apply without exception and should be treated as an integral part of SEC's organizational culture.

The Code does not describe every possible situation in which ethical dilemmas may arise, but it contains universal principles applicable to a wide range of cases. In the event of discrepancies between legal regulations and the provisions of the Code, the highest standards in accordance with applicable local law should always be followed. Since we operate in many countries, all members of our organization must be aware that their actions are subject to both national and international laws.

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SEC organizational culture

At SEC, we build a culture based on care, health, and inclusion – as the foundation of sustainable success. By acting responsibly and ethically, we create lasting relationships built on **cooperation and shared values.**

Sustainable development

Sustainable development means making conscious and responsible business decisions. In our operations, we follow international standards, as confirmed by our ISO 9001, ISO 45001, and ISO 14001 certifications. Our ethical and organizational culture distinguishes us both locally and globally. Development is an integral part of our identity – we value innovation, creativity, and continuous improvement.

Quality

Our activities are closely linked to the quality of the services we provide. We set high standards for diligence, effectiveness, and professionalism. We draw on extensive specialist knowledge and understand the needs and challenges of our clients. Any action that knowingly or unknowingly lowers the quality of our services is unacceptable.

Risk assessment

As a responsible organization, we take a realistic approach to commitments and risk assessment. Every action is preceded by an analysis of potential threats, aiming to minimize them and prepare for possible consequences. Reliable, fact-based evaluation is the foundation of effective prevention.

Due diligence

Aware of the impact our operations have on society and the environment, we make every effort to limit negative effects. **Due diligence** means acting **responsibly, in line with best practices and common sense**. It includes processes for identifying, preventing, mitigating, and accounting for the consequences of our activities. Our approach is based on OECD guidelines for responsible business conduct.

We also take into account the results of human-rights audits conducted by our clients. Recommendations related to communication, working conditions, accommodation, deductions and employee rights are analysed and implemented in line with responsible business conduct.

Open communication culture

We promote transparent and open communication. We believe that principles should evolve with the organization, which is why we are open to dialogue with all stakeholders. Everyone has the opportunity to report irregularities – such as violations of rules, policies, or laws. Every report is taken seriously, as it helps us maintain high ethical standards.

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Reporting issues

We encourage proactive responses to irregularities before they escalate into more serious problems. If you notice unethical behavior or violations of health and safety rules – do not ignore it. Your safety and well-being also depend on your involvement in creating a responsible work environment.

Reports can be submitted to a supervisor or **via an online form – including anonymously**. Reports made in good faith **will never be grounds for disciplinary action**. Detailed information can be found in the procedure for reporting irregularities. In case of doubt, you can contact the Quality Department: quality@secgrupa.com.

Personal responsibility

Each of us is responsible for our actions and for building a safe and ethical organizational culture. Violations of the Code may result in disciplinary consequences, especially in cases of:

1. Violating or encouraging others to violate laws, the Code, or company policies.
2. Failing to report known or suspected violations.
3. Retaliating against individuals who report irregularities.
4. Knowingly submitting false reports to harm others.
5. Failing to fulfill managerial duties or neglecting to uphold the Code.
6. Refusing to cooperate during an investigation.

Prohibition of Retaliation

We do not tolerate any form of retaliation against individuals who report irregularities in good faith or participate in investigations. Retaliation itself constitutes a violation of the Code and should be reported immediately.

Procedure after reporting

Every report is treated with the utmost seriousness. Upon receipt, an investigation is initiated, requiring cooperation and confidentiality from all involved parties. Information related to the investigation is protected in accordance with applicable legal regulations.

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Occupational Health and Safety

At SEC, we recognize[1] that the quality of our services is inseparably linked to our approach to occupational health and safety. In this area, we do not allow any compromises. We take our responsibility for the health and lives of our employees with the utmost seriousness, ensuring safe working conditions in accordance with applicable laws and international standards.

We promote a healthy lifestyle and treat mental well-being with the same care as physical health. Our goal is to create a work environment that supports both safety and the overall well-being of every team member.

Employer cooperation in OHS

SEC employees working on client premises are required to comply with the health and safety regulations in force at the respective site. In particular, they are obliged to:

- familiarize themselves with local health and safety rules,
- participate in mandatory health and safety training,
- immediately report any situations that may pose a threat to workplace safety to their supervisor.

Alcohol and drugs prohibited at work

For safety reasons, there is a strict ban on being present in the workplace under the influence of alcohol or intoxicating substances. Violating this ban may result in a warning or termination of employment under disciplinary procedures. Tests for prohibited substances may be conducted whenever deemed necessary and in accordance with applicable law.

[1] We monitor key safety indicators such as: Total Recordable Incident Frequency (TRIF), Severity Rate (SR), and Lost Time Injury Frequency / Days Away, Restricted or Transferred (LTIF / DART).

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Care for People and Respect for Human Rights

At SEC, we recognize respect for human rights as a fundamental obligation of every responsible organization. Our actions are based on respect for others, and cooperation with business partners must align with ethical principles and social responsibility. We follow UN guidelines on responsible business practices and human rights, acting in accordance with applicable laws.

We treat every individual with respect, honesty, and dignity. The recruitment and employment process is based solely on the qualifications, competencies, commitment, and achievements of candidates.

Prohibition of child labor, forced labor, and modern slavery

We employ only adults (18 years and above) with appropriate qualifications. Employment at SEC is entirely voluntary – we do not require recruitment fees, deposits, or documents that restrict freedom of movement or the ability to terminate cooperation.

We do not tolerate any form of forced labor, human trafficking, use of force, threats, fraud, or other manifestations of modern slavery.

Prevention of harassment and mobbing

There is no place for violence at SEC – whether physical or psychological. Any behavior that violates the dignity of another person is strictly prohibited, including offensive comments, gestures, facial expressions, or unwanted physical contact. Remarks about appearance, age, gender, or sexual orientation are also unacceptable.

Every case of mobbing, harassment, bullying, or disrespect must be reported immediately – including anonymously. Victims and witnesses of such situations are obliged to take action.

Labor rights and freedom of association

We respect every employee's right to form and join trade unions and to elect their representatives. Membership in employee organizations is entirely voluntary. Matters important to employees are consulted with their representatives.

Membership in employee organizations is entirely voluntary and is not a condition for employment or for working in a rotational schedule.

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Equality and anti-discrimination

We create a work environment that respects individuality and diversity. We provide all employees with equal opportunities for professional development, regardless of their position. We believe that diversity enhances creativity, efficiency, and job satisfaction.

We do not tolerate any form of discrimination, particularly on the basis of:

- social background,
- skin color or ethnic origin,
- gender and sexual orientation,
- religion or beliefs,
- worldview or political opinions,
- disability and age.

Employment conditions, remuneration, and working time

We ensure fair employment conditions in accordance with applicable labor laws. We offer competitive salaries and benefits that meet or exceed minimum legal requirements, taking into account local market realities.

Employees are entitled to leave and time off in accordance with legal regulations and the official holiday calendar.

Deductions and Cost Recovery

SEC may apply deductions from wages only in strictly defined cases, in compliance with applicable law and contractual provisions:

- **Training or certification costs** – only if the employee terminates the contract within the first 6 months of employment, and only up to the actual documented cost.
- **Late accommodation check-out** – only if the delay is caused by the employee and results in additional charges from the accommodation provider.
- **Bank transfer fee** – a fixed amount of NOK 75 applies only when the employee chooses to receive salary in a foreign bank account; this fee reflects actual bank charges and can be avoided by using a Norwegian account.

Additional employment

Additional employment for full-time employees is not recommended and may, in some cases, be legally prohibited. If not contractually or legally restricted, it is permitted provided that it does not interfere with the employee's duties at SEC and does not lead to a conflict of interest.

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Human rights in the supply chain

We expect our business partners to share our commitment to respecting human rights. We are aware that risks of violations may occur within the supply chain, which is why we analyze and manage them as part of our Human Rights Due Diligence (HRDD) processes.

In cases of serious ethical violations, cooperation with a supplier or partner may be suspended or terminated.

Business Ethics and Responsibility

At SEC, we value honest and transparent business relationships. We are committed to complying with applicable industry standards, clearly defining terms of cooperation, and making decisions based solely on substantive considerations.

We avoid conflicts of interest, do not accept financial benefits, and do not tolerate any form of corruption. All disputes and misunderstandings are resolved constructively, in accordance with the principles of ethics and mutual respect.

Fair competition

We conduct our business based on the principles of fair and open competition, with respect for applicable laws. Information about competitors is obtained only in a legal and ethical manner.

Information security and data protection

We respect intellectual property and confidential information. Such data is processed securely and used only for the purposes for which it was collected. We apply the principle of limited access and protect our IT systems against unauthorized access.

Personal data

As part of our operations, we process personal data in accordance with applicable laws. We treat this data with the utmost care and responsibility. Data may be shared only with authorized entities, such as clients or insurance institutions. Detailed information is available in our privacy policy published on the SEC website.

Confidential information and intellectual property

SEC employees may have access to confidential information, trade secrets, and intellectual property. This information must not be disclosed, copied, or used without proper authorization – including during work performed for clients.

Intellectual property includes, among others, trademarks, copyrights, trade secrets, and domain names. Confidential information refers to non-public data such as strategic plans, financial data, or marketing materials.

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Protection of property and resources

Every employee is obliged to protect company property as well as the property of clients for whom they work. Tools and equipment must be used solely for professional purposes, in accordance with their intended use, and properly secured after work.

Intentional damage, theft, or misuse of property is considered a serious breach of employee duties and may result in disciplinary action. Fraud, embezzlement, and other crimes will be reported to the appropriate authorities.

Conflicts of interest

We do not allow private interests to influence decisions made on behalf of the company. We avoid situations that could lead to a conflict of interest or even the appearance of one. Any doubts should be reported to a supervisor.

The following actions are prohibited:

- working for a competitor,
- using confidential information (so-called insider trading),
- abusing resources, position, or influence for personal gain,
- expecting benefits from suppliers or clients in exchange for favorable treatment,
- directing orders to companies in which the employee or their relatives have a personal or financial interest.

Zależności służbowe w rodzinie Family work relationships

We allow the employment of related individuals, provided there is no direct reporting relationship between them. Employment must be based on competencies and alignment with the organizational culture. Family members are subject to the same labor laws as all other employees.

Non-compete after termination

SEC does not impose any non-compete restrictions after termination of employment. However, please note that some clients may apply their own restrictions regarding employment at specific sites or projects – these are independent of SEC and based on the client's internal policies.

Anti-Corruption

Corruption poses a serious legal and reputational risk. We do not make promises or offer benefits in exchange for business favor. We comply with national and international regulations on anti-corruption, money laundering, and counter-terrorism financing.

The Code is supplemented by internal procedures that define responsibilities and provide tools to prevent abuse.

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Gifts and Hospitality

We allow the practice of mutual hospitality, provided it is conducted transparently and in accordance with applicable rules:

- all gifts and benefits must be disclosed and approved by SEC,
- cash or cash equivalents must not be accepted or given,
- employees must not request invitations, gifts, or other benefits,
- in case of doubt, refrain from accepting or giving a gift,
- respect the rules in place at business partners.

Selection of suppliers and service providers

All offers are evaluated fairly and in accordance with the law. We cooperate only with partners who comply with the principles outlined in this Code. Violations of these principles may result in the termination of cooperation.

Social Responsibility

At SEC, we recognize the importance of social engagement. We encourage our employees to participate in local charitable initiatives (excluding political activities), provided that such involvement does not interfere with their professional duties. Participation in these activities is voluntary – no one should be forced or pressured to contribute time or financial resources.

Charity and sponsorship

Donations and sponsorship activities are part of building a positive image of the company and may only be carried out in accordance with the internal rules of the SEC Group.

Each donation must be documented – its purpose, recipient, and confirmation of funds transfer must be clearly defined and verifiable. We do not make payments to private accounts or support organizations with questionable reputations.

Taxes and fees

Compliance with tax obligations is not only a legal requirement but also an expression of our social responsibility. Violations in this area can damage the company's reputation and undermine the trust of our stakeholders.

As an international organization, we comply with the tax regulations applicable in each country of operation. Failure to meet these obligations may result in serious financial and legal consequences – both for the company and for the individuals responsible.

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Environmental protection

We understand that the natural environment provides us with essential resources – air, water, and food. Therefore, we are committed to using natural resources responsibly and minimizing our environmental impact.

We operate in accordance with applicable environmental laws and standards. Our environmental management system is certified under ISO 14001. We regularly monitor and improve our activities in this area.

Main Areas of Environmental Impact:

- waste generation,
- consumption of natural resources (including energy),
- business travel.

Our Environmental Goals:

- applying the 3Rs principle: reduce, reuse, and recycle,
- choosing transportation methods that minimize environmental impact,
- saving water,
- complying with environmental laws and regulations,
- regularly reviewing and updating our environmental policy,
- sharing environmental goals with clients,
- publishing the environmental policy internally and externally,
- promoting ecological awareness among employees.

Postanowienia końcowe Final provisions

This Code of Conduct and Ethics has been approved by the Management Board of the SEC Group. Any deviations from its provisions require written consent.

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Are you an SEC employee?

Your engagement and responsibility are crucial to maintaining high ethical and safety standards within our organization. Therefore:

- regularly participate in training and understand the scope of your duties,
- familiarize yourself with the SEC Code of Conduct and Ethics – understand its principles and follow them in your daily work,
- report any irregularities, concerns, or suggestions,
- actively participate in investigations if you are involved,
- do not hesitate to ask questions or raise concerns,
- take care of SEC's and our clients' property and resources.

When should you report a problem?

If the answer to any of the following questions is "yes" or "maybe" – report the issue:

- Could the observed behavior violate laws, the Code, or other company policies (e.g. OHS, CSR, IMS)?
- Could it be perceived as dishonest, unethical, or illegal?
- Could it negatively affect SEC's reputation?
- Could it harm others – colleagues, clients, investors?

You do not need to have all the information – if in doubt, take action.

Are you a manager?

As a leader, you are a role model. Your attitude directly influences the organizational culture. Therefore:

- follow the Code and encourage others to do the same,
- never ignore unethical behavior,
- be available and open to employee questions and reports – you are a key link in the reporting system,
- never retaliate against individuals who report issues in good faith.

Are you a supplier or partner?

We expect our business partners to follow the same principles that apply at SEC. In particular:

- respect human and labor rights,
- provide a safe, healthy, and discrimination-free work environment,
- treat employees with dignity and respect.

In the event of human rights violations, SEC expects partners to provide effective remedies.

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