

Dear Nemko colleagues

Nemko shall in our provision of services to our customers and in our interactions with partners, governments and the wider community, represent safety and sustainability with a sound and profitable business, and act in accordance with what we promise.

We are a global company. Regardless of where we are, our conduct of business and provision of services shall be law-abiding and sustainable. Our services shall be robust. They shall be performed in a professional and timely manner, in accordance with the applicable agreement with customers and our management system. This Code of Conduct is meant to maintain a common set of expectations to each and every individual and team.

There are eight main elements in the Code of Conduct. They represent an integral part of who we are and who we want to be.

We shall:

1. make informed decisions;
2. maintain impartiality and independence in our conformity assessments;
3. safeguard the confidentiality of Nemko's and our customers' information;
4. understand and abide by local law and agreements with customers;
5. act in an ethical manner and not engage in human trafficking or corruption in any of its forms;
6. care for the environment and sustainability;
7. care for our colleagues and maintain their trust; and
8. encourage reporting of breaches of this Code of Conduct.

These requirements apply for all in Nemko, at all levels. They apply also for those who represent us without being employed, and for the Board of Directors in the various legal entities in Nemko.

Lysaker, Norway, 1st February 2026



Per Ove Øyberg
CEO Nemko Group AS



Ingvild Myhre
Chair, Nemko Group AS



Nemko Group Global Code of Conduct

1 We make informed decisions

Nemko shall make informed decisions and manage risks arising in connection with our daily operations and support activities, major decisions and projects at global or local level in accordance with the principles set out in ISO 31000. The elements listed below in 2–8 should be included in the risk assessments.

2 We maintain impartiality and independence in our conformity assessments

Every one of us shall take the time to acknowledge that together we contribute to Nemko's role as an independent third party conformity assessment body.

A basic expectation to this role is that each of us shall not let — or be perceived to let — our professional judgment or the execution of work be unduly influenced by other interests, concerns, pressures or familiarities than those that are relevant under the schemes concerned. There will and shall always be room for individual professional discretion in our performance of work — and this authority must be used in a transparent, informed and professional manner, within the direction of the applicable scheme.

This means that we shall always apply our intellectual ingenuity, our commercial understanding and our combined domain and regulatory knowledge to accommodate customer needs for professional conformity assessment services delivered on time in accordance with contract specifications.

We shall document what we do in a manner which allows us to demonstrate that we have actually performed our work in accordance with the applicable requirements, including contracts and Nemko's requirements. All shall use the designated global digital Nemko Group Management System, workspaces and archive systems.

Our reports and certificates shall present what we do in a transparent and correct manner. We shall not misrepresent the nature or extent of our work and communicate that we do one thing, while in reality we do something else.

3 We safeguard the confidentiality of Nemko's and customers' information

Everyone working for Nemko shall contribute to safeguarding the confidentiality of both our own and customers' information, data and business secrets. Information shall only be accessed on a need-to-know basis. Access to customer information shall as a starting point only be given to customer itself.

All have a personal responsibility to comply with the directions given for compliance with the requirements following from Nemko's ISO/IEC 27001 certification. This applies in particular for use of the designated global digital Nemko Group Management System, workspaces and archive systems.

Tools applying Artificial Intelligence features can be used in conduct of business or provision of services if approved in accordance with the applicable Nemko procedures. Nemko Group IT's requirements, guidelines and protocols shall be complied with for the purpose of development of AI-based tools.



4 We understand and abide by local law and our agreements with customers

Local laws and regulations must be complied with, both in our service provision and in our conduct of business. That applies for instance for tax, license, authorization, personal data, business secrets handling and reporting purposes. If Nemko has decided to establish and maintain operations in a specific country, we have also accepted that local law applies. Breaches of law can have significant negative effects for our operations, customers, reputation and personnel. To the extent the Code of Conduct or Nemko global Management System are stricter than the local law, the strictest set of requirements shall apply.

We honor our agreements with customers, and do not promise something that we cannot or do not deliver.

All statements that we issue, whether from support functions or in our service delivery, represent what we do in an open and transparent manner. In particular, we do not misrepresent in reports or certificates the nature or extent of the work that we perform for customers.

5 We act in an ethical manner and do not engage in human trafficking or in corruption in any of its forms

We do what is right and act in an ethical manner in our conduct of business and provision of services.

It is strictly prohibited for Nemko personnel to purchase sexual services in connection with work for Nemko or to support human trafficking by in company context.

Corruption represents a threat against fair trade, development, democracy and a well-functioning civil society. Corruption also represents a risk from reputational, commercial and criminal law perspective for Nemko as well as a risk for our colleagues and their families. We shall comply with the applicable gifts and hospitality guidelines, and we shall not

1. Make payments or provide gifts or hospitalities to a company or an individual to obtain benefits for Nemko or colleagues without us being legally entitled to these benefits (bribery). Neither shall we accept similar gifts or favors to Nemko or our colleagues from customers or others.
2. Make payments or provide gifts or hospitalities to friends, family, relatives and others in the environment of a decision-maker to influence the decision-maker to obtain decisions or business that we might not otherwise have obtained (trading in influence).
3. Pay or receive so-called facilitation money. These are payments that are typically requested by public officials who control some kind of bottleneck for a person's legitimate access to goods and services. The bottlenecks may typically be related to physical access to customer facilities, issuance of a work permit, a building permit or a business license, transit at airports, issuance of certificates or test reports or access to a customer product at a delivery point.

Due diligence shall be demonstrated in the selection and contracting of subcontractors and partners, in particular for agents and other middlemen used in the provision of our services.

6 We care for the environment and sustainability

Nemko shall implement environmentally sustainable practices and reporting in accordance with law and customer requirements, both globally and locally, in our conduct of business and provision of services as well as in our management of suppliers.



7 We care for our colleagues and maintain their trust

Nemko and all who work for us have a responsibility to protect and contribute to the safety, health and well-being of our colleagues worldwide.

All in Nemko shall be treated fairly and with respect. The work environment shall be free from verbal or physical harassment. A principle of equal treatment in accordance with objective criteria shall be applied from employer perspective. Nemko does not discriminate based on race, colour, gender and political or religious belief.

Nemko shall protect the personal identifiable information (PII) of all those that work for Nemko.

Use of Nemko's assets or facilities for personal purposes is not allowed unless pre-approved at the right level in the organization or otherwise following from the context.

We all have the responsibility to apply the elements of the Code of Conduct in our day-to-day activities, in good times and in bad times. In order for all of us to live up to these expectations, it is important that all can trust that all that work for Nemko shall

1. have access to the training and qualifications necessary to provide the services in a professional manner and to comply with this Code of Conduct;
2. be allowed to exercise professional judgment in the execution of conformity assessments in an independent and impartial manner without undue interference from superiors;
3. get the necessary support from the organization in case of pressure to make decisions or take actions which are contrary to this Code of Conduct or which otherwise jeopardize the impartial and professional execution of Nemko's role as independent third party;
4. be able to address challenges or concerns regarding Nemko's conduct of business or provision of services by using the internal channels dedicated to this, without fear of retaliation; and finally
5. have the right to express views and concerns in good faith, using the channels and reporting lines available.

8 We encourage reporting of breaches of the Code of Conduct

Doing the right thing is not always easy.

In some cases the Code of Conduct, our trainings and Nemko's Management Systems might not provide the necessary guidance and you are in doubt regarding what to do in a particular situation. Please seek advice or report misconduct as close to your place in the organization as possible.

This means your primary contact point for support and reporting of misconduct is your Line Manager or the relevant Quality Manager. If the Line Manager or Quality Manager are not available or there are other legitimate grounds to bypass the line, you can also contact the Nemko Group General Counsel. There should be substantiated good grounds to report to the Nemko Group General Counsel directly.

In some local units there are dedicated reporting tools available.