

OK

Business Conduct Policy

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Purpose

This policy brings together OK's approach to business conduct and forms the foundation for how we, as a company and as employees, must act in practice – with integrity, accountability, and respect for applicable laws and ethical principles.

Scope of the policy

This policy applies to all employees and contractors within the companies in scope (OK a.m.b.a., including OK Plus A/S, Danoil Exploration A/S). It sets out OK's internal ethical standards and expectations for responsible conduct, respect for human rights, and anti-corruption.

For external business partners and suppliers, reference is made to OK's Supplier Code of Conduct, which sets out requirements for ethical business conduct, human rights, and anti-corruption throughout the value chain.

Ethical principles and values

OK seeks to base all aspects of our activities on ethical business conduct. Our approach is anchored in recognized international guidelines for responsible business conduct, including:

- The UN Global Compact, which sets out 10 principles for responsible business conduct.
- The OECD Guidelines for Multinational Enterprises, which support responsible business practices.
- The UN Guiding Principles on Business and Human Rights, which clarify the responsibility of companies to respect human rights.

Content of the policy

The Business Conduct Policy sets out the following specific expectations for responsible conduct among OK's employees and management:

1. Compliance with laws and conventions

OK is committed to comply with all laws and regulations in the countries and sectors where we operate. In addition, we respect relevant international conventions and standards for responsible business conduct. We expect all employees to act in accordance with legal requirements and to seek advice in case of doubt.

2. Human rights

OK respects the international human rights and labour rights as defined by the UN Universal Declaration of Human Rights and the International Labour Organization (ILO). OK is committed to identifying, preventing, and mitigating any adverse human rights impacts that we may cause or contribute to through our business activities. We treat employees, suppliers, customers, and other business partners with trust, respect, and equality.

3. Corruption and bribery

OK has a zero tolerance towards corruption and bribery. No one may offer, promise, give, or receive anything of value that could result in undue or unethical influence on decision-making. We act with integrity, both internally and externally.

4. Conflicts of interest

Employees and contractors must avoid situations where personal, financial, or family interests may affect their professional judgement.

5. Nepotism and favouritism

OK makes decisions based on competencies and objective criteria. Our decisions must not be influenced by personal relationships, and we expect a professional and fair approach in all processes.

6. Money laundering

OK will not engage in or facilitate money laundering or other illegal transactions. We comply with applicable rules on financial transparency and reporting and remain attentive to risks in our business relationships.

7. Free and fair competition

OK supports free and fair competition and complies with competition law. We do not participate in cartels, price fixing, or other practices that restrict the functioning of the market or harm consumers.

8. Export controls and sanctions

OK complies with all relevant export control laws and does not trade with entities, individuals, or countries subject to international (UN and EU) sanctions. We carry out necessary controls and due diligence in our business trades.

9. Information security and cybersecurity

OK protects confidential information, personal data, and digital systems against unauthorised access, misuse, and data loss. All employees and contractors are responsible for following internal guidelines for security and data protection.

10. Communication and openness

OK promotes a culture based on openness, honest communication, and transparency. We share relevant information in a timely and clear manner – both internally and externally – and encourage dialogue, knowledge sharing, and responsible communication in all relationships.

11. Grievance mechanism and whistleblower scheme

OK provides secure and confidential channels for reporting concerns about unethical or illegal conduct. OK's whistleblower scheme is available to all internal and external stakeholders, and all reports are handled with respect for anonymity and due process.

Implementation, training, and prevention

OK works actively to prevent unethical behaviour and to ensure that the Business Conduct Policy is put into practice. This is achieved through internal training and awareness programmes, where OK's employees and managers are regularly informed and trained in this policy as needed.

Duty to report

OK seeks to promote a culture of openness and accountability. All employees are obliged to act if they become aware of conduct that contravenes this policy. Concerns may be reported to the immediate manager or another manager in the organisation.

In addition, serious matters may be reported anonymously through OK's whistleblower scheme, available on OK's website.

Any questions?

In case you have questions to this policy feel free to contact Legal, Bid & Compliance.



OK a.m.b.a.

Åhave Parkvej 11
8260 Viby J
Tlf. 70 12 12 33

sustainability@ok.dk
www.ok.dk
CVR-nr. 39170418