



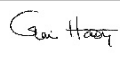

KONGSBERG

Kongsberg Gruppen ASA

Code of Ethics and Business Conduct

KOG-GOV-0011

Document ID: KOG-GOV-0011 Code of Ethics and Business Conduct RevK

Rev	Date	Reason for issue	Author	Approved by	Sign	Security level/ IPR
-	2004	First issue	Nils Molin	CEO/J E Korssjøen		
A	AUG 2005	Update	Even Aas	CEO/J E Korssjøen		
B	24 APR 2008	Update	Nils Molin	CEO/W Qvam		
C	01OCT 2009	Update	Compliance Team	CEO/W Qvam		
D	25 JAN 2011	Update	Lene Svenne	CEO/W Qvam		
E	05FEB 2014	Update	LeneSvenne	BoD CEO/W.Qvam		
F	30JUN2016	Update	LeneSvenne	BoD CEO/G Håøy		Public
G	13FEB2019	Update	CCO L.Svenne	BoD CEO/G Håøy		Public
H	01JUL2022	Update	CCO Yngve Larsen	BoD CEO/G Håøy		Public
J	01JAN2026	Update	CCO Yngve Larsen	BoD CEO/G Håøy		Public
K	23APR2026	Update	CCO Yngve Larsen	BoD/CEO/ Eirik Lie		Public

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1. Message from KONGSBERG's President & Chief Executive Officer

Acting responsibly in a changing world

The world around us is changing rapidly. Climate, security, geopolitics, and technology all affect how we operate. In addition, the world around us recognises the increased impact our company has. This is something we shall be proud of, and build on, but also understand the expectations placed on us. Responsibility, integrity and sound judgement are more important than ever.

KONGSBERG's purpose is to protect people and planet by innovating technology today, for a better tomorrow. This is not a statement of ambition alone. It is a practical guide for how we make decisions, manage risk and create long-term value.

Trust is fundamental to our business. We build trust by acting ethically, complying with laws and regulations, and being transparent in how we operate. Our Code of Ethics and Business Conduct set clear expectations for everyone who works for, with, or on behalf of KONGSBERG, regardless of role or location.

Our values — determination, innovation, collaboration, and reliability — define how we work. They guide how we engage with customers, partners, authorities, internally, and the communities affected by our activities. Responsibility cannot be delegated. Each of us is expected to act with integrity, raise concerns and speak up when something is not right. This applies especially in difficult situations or when the right answer is not immediately clear.

We work continuously to identify, prevent and mitigate adverse impacts related to our operations and our value chain. Due diligence is an integral part of how we operate responsibly and protect the trust placed in us.

When you act on behalf of KONGSBERG, you represent our people, our culture and our responsibilities beyond the company itself. This requires awareness, professionalism and respect. This is how we protect our license to operate and our future.

Eirik Lie
President & CEO
KONGSBERG

2. Our responsibilities

Our Code of Ethics and Business Conduct (the “Code”) defines the principles that we are required to demonstrate in everything that we do. They codify our values and guide us to demonstrate responsible business conduct.

The Code applies to all KONGSBERG employees within every subsidiary and joint ventures where we have control. Where we have non-controlled joint ventures, we encourage the joint venture to adopt the principles of this Code.

The Code establishes the minimum standards of conduct that are expected, regardless of our geographical location. If you believe the principles in this Code conflicts with local law and you are unsure how to act or behave, then you should follow the higher standard. In this situation you may also need to seek guidance from your manager, the ethics and compliance team or legal team.

Breaches of this Code are not acceptable and will result in the Company taking action. Consequences may include disciplinary action up to and including dismissal. If you witness or identify any misconduct, unethical conduct, or breaches of this Code you should speak up and raise your concern as detailed in section 7 below.

At KONGSBERG, compliance with applicable laws, regulations, and internal requirements is a fundamental part of our Corporate Governance. This Code has been approved by the Board of Directors in KONGSBERG. The CEO is authorised to sign the Code and may approve documented and justified deviations from it.

It is not possible for this Code to be exhaustive and set out every legal or Company requirement. In some situations, you will need to use common sense and good judgement to make ethical decisions based on the principles contained in this Code. If you are faced with a dilemma and you are unsure how to solve it, then you should seek guidance.

2.1 Your responsibilities as employee

You must make time to read and understand the principles set out in this Code. If you have any questions, speak to your manager, or seek advice from the ethics and compliance team.

Our principles:

- We ensure that we understand and comply with this Code and our governing documents.
- We comply with laws and regulations.
- We undertake relevant training.
- We participate in fostering a solid and robust culture of ethical behaviour and a safe, open and inclusive working environment.
- We conduct ourselves with integrity.
- We shall not engage in any activity that creates a conflict of interest.
- We shall promptly report any concerns, suspicions or observation of misconduct, unethical behaviour or potential breach of this Code as described in section 7 through raising concerns channels.

2.2 Responsibilities of leaders

We recognise our leaders have a key role empowering and coaching teams and investing energy to drive performance. We rely on our leaders at every level of the company, to accept responsibility for facilitating and supporting a culture of integrity.

Our principles:

- We shall value, support, and develop others.
- We manage any risk or conflict proactively.
- We act as ethical role models and demonstrate intolerance for unethical behavior or breaches of our Code.
- We encourage a speak up culture in which colleagues feel comfortable discussing risk or raising concerns.
- We ensure that all team members have access to and understand the Code.
- We raise concerns when they arise.

3. We will treat people with respect and dignity

KONGSBERG is committed to providing a working environment that is safe, productive, and stimulating place to work, and to ensure an inclusive working environment. We shall foster communication, productivity, creativity, teamwork, and employee engagement.

Our principles:

- We comply with local and applicable international legislation and generally accepted frameworks.
- We will respect all internationally recognised human rights, including those set out in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and applicable standards of international humanitarian law.
- We comply with national regulations and collective agreements on working time and where possible provide for a flexible working environment.
- We support employees' freedom of association and recognise the right to collective bargaining in accordance with national laws and regulations.
- We recruit, employ, and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.
- We value diversity and promote equal opportunities and inclusion.
- We seek to provide employees with a remuneration package that meets or exceeds the legal minimum standards and that is in line with industry standards in the markets in which we operate.
- We do not accept or tolerate discrimination of any kind, including in hiring, compensation, access to training, promotion, termination, or retirement based on gender, race, colour, national or social origin, ethnicity, caste, religion, age, disability, sexual orientation, gender identification or expression, pregnancy, political affiliation, union membership or any other status protected by applicable law.
- We strive to conduct ourselves with integrity, showing respect and dignity for colleagues and others we meet in the course of our work. Bullying, harassment, and similar behaviour will not be tolerated.
- We will not use any form of forced, compulsory, trafficked or child labour.
- We seek to reward and recognise high performance and actively manage under performance. We assess performance in a fair and consistent manner.
- We actively engage and involve our people in improving the business and welcome employee feedback.

The safety of our employees and other individuals performing work on our behalf is of the utmost

importance to KONGSBERG. Risks and threats that could cause harm to personnel on duty, on and off-site, shall be identified, analysed, and controlled.

Our principles:

- We should take responsibility for our health and safety and that of others.
- We develop emergency plans and regularly carry out exercises in accordance with these plans.
- We strive to protect our people and the business from health and safety risks that could arise from our work activities.
- We strive and aspire to achieve zero harm in the workplace.
- We should identify and mitigate health and safety risks before we start work.
- We are committed to continuous improvement by working together and complying with agreed processes across businesses, functions, and geographies.
- We shall speak up when safety, health or integrity at work is comprised in anyway.

4. Our operations shall be sustainable

Sustainable development is a development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Our principles:

- We are committed to achieving sustainable development in our operations.
- We strive to strike a good balance between financial results, value creation and corporate social responsibility. We embed sustainability in our strategy.
- We seek to leverage our competence and expertise towards contributing to developing a sustainable future.

4.1 The climate and environment

KONGSBERG shall act responsibly and aim to reduce our footprint on the environment. This includes discharges to water, air and ground, consumption of resources, hereunder energy consumption, water consumption and waste treatment.

Our principles:

- We work towards reducing direct and indirect emissions of greenhouse gases in our operations.
- We seek to recognise the impact of environmental harm and climate change on human rights.
- We strive to reduce our footprint on the environment and seek to avoid adverse environmental impact to the communities in which we operate. Where a risk of such impact remains, we shall put in place measures to prevent or mitigate the risk.
- We are committed to reducing the environmental impact of our products and services and develop new solutions for green technology through investment in research and development and by applying technological innovation.

4.2 Respecting human rights

Respect for human rights is at the heart of sustainable development. By adhering to and promoting the human rights standards set out in our Directive for Human Rights risk assessment and reporting.

Our principles:

- We commit to identify, prevent, cease, mitigate and remediate any adverse impact of our business activities to the people we employ, in our supply chain, with our business partners and in local communities and society at large.

5. We shall conduct our business reliably**5.1 Anti-Corruption**

Corruption undermines legitimate business activities, distorts competition, endangers reputations, and exposes companies and individuals to risk.

Our principles:

- KONGSBERG is opposed to all forms of corruption.
- We shall conduct business with integrity, always complying with anti-bribery and corruption laws and our directives.
- We will not offer, promise, give, solicit, or receive – directly or indirectly anything of value to or from a government official or someone in the private sector to obtain or retain business advantage or secure some other improper advantage.
- We will not make facilitation payments or permit others to make them on our behalf.
- We shall inform the ethics and compliance team if we become aware of any requests or solicitations for improper payments.

5.2 Gifts and hospitality

KONGSBERG encourage our employees to build and maintain relationships with our Business Partners through networking and social interaction.

Our principles:

- We only offer or receive gifts and hospitality in line with our directives and always within applicable laws and legislation.
- Gifts and hospitality shall be reasonable, justifiable, and not lavish nor excessive.
- We shall not offer or receive gifts and hospitality that is extended to improperly influence a business decision or gain an undue competition advantage.
- Interactions with public officials or state organisations present particular risk that must be adequately addressed.

5.3 Sponsorship, Political and Charitable Donations

Through sponsorships and charitable donations, KONGSBERG aims to build positive relationships with and make investments in the communities in which we operate.

Our principles:

- We shall not give political contributions, or use company funds or resources to support any political candidate or party even if combined with charity. If you choose to participate in political activities or give any political contributions, this must be personal and not linked to KONGSBERG.

- We shall perform appropriate due diligence on all sponsorships and charitable donations.
- We will be transparent and fully comply with public disclosure requirements.

5.4 Fair competition

KONGSBERG shall compete fairly and build our business and reputation on world-class quality.

Our principles:

- We will compete in a respectable and ethically responsible manner within the framework of anti-trust and competition laws and regulations that apply in the countries and markets in which KONGSBERG operates.
- Abuse of any dominant position is prohibited
- We don't fix prices with competitors
- We don't engage in bid-rigging
- We don't engage in market allocation
- We act carefully in trade associations
- We don't share commercially sensitive information with competitors

5.5 Trade Regulations & Sanctions

KONGSBERG is committed to complying with all applicable sanctions, export, import, transit, and trade compliance laws in all countries in which KONGSBERG operates. These laws include embargoes, sanctions, customs, product/country of origin marking, and anti-boycott laws.

Failure to comply, or failure to report any possible deviations or non-compliance, can cause severe penalties and restrictions on our business in the future including our license to operate.

Our principles:

- We will comply with all applicable export, import, transit, and trade compliance laws in all countries in which KONGSBERG operates.
- When transferring products, services, software, or technology within your country or across national borders we shall be aware of and follow laws and regulations.
- We classify our products, services, software, or technology.
- We will not engage with persons or companies that have been placed by governments on sanctioned party lists.
- We will ensure that all duties, levies, and tax obligations are satisfied, that the terms and conditions of any import or export authorisations are complied with, and that any necessary import or export declarations are made including those to the Customs Authority at the point of exit and/or entry.

5.6 Anti-Money Laundering

Money laundering can be defined as transforming the proceeds of crime into the legitimate economy. It can often be seen in connection with other types of crime, including drug trafficking, terrorism, corruption, and tax evasion.

Our principles:

- KONGSBERG is firmly opposed to all forms of money laundering.

- We will comply with all applicable anti-money laundering laws.
- We shall take appropriate steps to prevent our financial transactions from being used by others to launder money.
- We shall ensure that our Business Partners is legally established and conducting a law-abiding business.

5.7 Responsible Tax

KONGSBERG's international presence means that we must comply with a wide variety of tax legislation in many countries. We take a responsible approach to taxation that is decisive for our long-term activities in the countries in which we operate.

This includes identifying and complying with current tax legislation, disclosing all the necessary information to the relevant authorities, and taking prudent tax positions where tax legislation allows different interpretations or choices. Transactions shall only be made if they satisfy the requirements for form as well as content pursuant to the tax legislation of the countries in question. KONGSBERG shall not employ "artificial" structures in tax havens to avoid paying tax.

5.8 Professional secrecy

We respect obligations of confidentiality related to information entrusted to KONGSBERG by third parties such as customers and Business Partners.

An obligation to keep information confidential may follow from agreements or other forms of mutual understandings, and/or relevant laws and regulations.

Our principles:

- We shall maintain professional secrecy in respect of all business matters and other situations that could give outsiders access to confidential information.
- When working on programs which are subject to military classification rules shall adhere to any applicable security regulation, including safety obligations as set out below and our contracts for such programs.

5.9 Classified information

KONGSBERG are according to national safety legislation required to safeguard all military classified information.

Our principles:

- We shall establish and maintain systems to protect all classified documents and/or equipment and obtain the necessary system and site approvals from our customers and national security authorities.
- We shall ensure that all employees and subcontractors that are given access to classified information have the necessary security clearances and authorisation.

5.10 Data Privacy

We use personal information that we are entrusted with in a responsible way.

Our principles:

- We respect the personal privacy of our employees and Business Partners.

- We collect and process personal data relating to our employees and Business Partners in accordance with applicable laws and regulations and adhere to our binding corporate rules <https://www.kongsberg.com/privacy>.

5.11 Conflicts of interest

We ensure our business judgement is not influenced by personal interest.

Our principles:

- We shall disclose and record any actual or potential conflicts of interests.
- Where conflicts exist, we will manage or mitigate them.
- When employing or engaging the services of a current or former military and civilian public officials we comply with applicable laws and regulations.
- We speak up when we believe there is or might be a conflict of interest.

5.12 Intellectual property rights

KONGSBERG's intangible assets are fundamental to our business. They include our knowledge, ideas, structures and working methods. We have a duty to protect our assets.

Our principles:

- We safeguard our assets and manage them in the best interest of KONGSBERG.
- We shall show respect and uphold our duty to protect assets entrusted to us by third parties.

5.13 Correct information and communication

Information provided about KONGSBERG's business operations shall be communicated precisely and correctly, inside, and outside of KONGSBERG. Corporate communications will manage official communications.

Our principles:

- We will secure appropriate approval before making any public statement about KONGSBERG.
- We keep our stakeholders informed by providing information through reporting and our media channels.
- We shall always exercise due care and integrity when speaking about KONGSBERG on social media.
- We shall assume all information not already in the public domain is confidential information.
- We shall exercise the highest standard of care in preparing information and communication materials.

5.14 Insider information

Insider information is confidential and share price sensitive information and shall not be shared to any unauthorised individuals or companies.

Our principles:

- We shall maintain the confidentiality of any inside information to which you have access to avoid any accidental disclosure.

5.15 Accurate Business Records

We will maintain accurate and complete records of our business dealings.

Our principles:

- We ensure all business information documentation including not limited to our financial records and transactions must be timely, accurate, complete, fair, and understandable.
- We maintain a rigorous system of financial, operational and compliance controls and an effective system of risk management.
- We adhere to all accounting standards and relevant legislations.
- Payments to Business Partners shall only be made against invoices that are issued based on agreements in writing between KONGSBERG and the other party.
- We ensure that payments from KONGSBERG shall be made by bank transfer. All company funds shall be used prudently and in agreement with KONGSBERG's governance documents.
- No transaction may be intentionally misclassified, e.g., as to accounts, departments, or accounting periods.
- We will not conceal information from auditors; internal, external, or other independent auditors.
- We speak up if we have concerns about any business records.

6. We are committed to working with Business Partners with integrity

6.1 Supply Chain

KONGSBERG has a large and diverse extended supply chain of goods and services, and we recognise the critical role our suppliers play in helping us to source responsibly and sustainably.

Our principles:

- In collaboration with our suppliers, we will strive to ensure that operations are conducted in compliance with internationally recognised standards for responsible business conduct.
- We require suppliers to comply with the values and principles set out in the KONGSBERG Supplier Conduct Principles. We also expect our suppliers to cascade these principles throughout their supply chains.
- We shall continuously perform due diligence for responsible business conduct aligned with the OECD Guidelines for Multinational Enterprises to identify, assess, cease, prevent mitigate and remediate adverse impacts in our supply chain with respect to human rights, the environment or other integrity risks. In line with our Supplier Conduct Principles, our suppliers are also required to conduct due diligence to ensure responsible business conduct.

6.2 Business Partners

The nature of our work requires KONGSBERG us to interact and transact frequently with business partners. Our Business Partners, include but are not limited to customers, resellers, sales representatives, distributors and dealers, integrators, joint venture partners or other cooperation partners, market and sales representatives, agents, offset partners, consultants, and custom agents.

Our principles:

- We treat all our Business Partners with fairness and integrity and build mutually beneficial relationships.

- We aim to build and maintain high levels of customer satisfaction through our commitment to improving quality, delivery, responsiveness, and reliability.
- We endeavour to only work with reputable Business Partners.
- We only appoint Business Partners to assisting us in marketing, sales and distribution our products and services who are of known integrity and whose conduct always meets our standards.
- We shall continuously perform risk based due diligence for responsible business conduct aligned with the OECD Guidelines for Multinational Enterprises to identify, assess, cease, prevent, mitigate and remediate adverse impacts related to our Business Partners.
- We will monitor our Business Partners throughout the life of the business relationship to ensure they operate to the highest standards of quality and integrity and provide KONGSBERG with the value they have promised to deliver.

6.3 Communities and other stakeholder

We seek to contribute to the economic develop and social well-being of communities in which we operate. Our aim is to ensure through dialogue that we are listening to, learning from, and considering the views of rightsholders as we conduct our business.

As part of our due diligence for responsible business conduct, we shall engage with rightsholders and their legitimate representatives who are, or are at the risk of, being adversely affected by our business activities.

7. Raising Concerns

Compliance with applicable laws and regulations and internal requirements is an important part of our corporate governance.

It is essential for KONGSBERG that our employees share their concerns to help protect the company, our colleagues, and our stakeholders. If you believe someone is violating the Code of Ethics, internal directives or the law, we urge you to report it immediately. If you have experienced or witnessed misconduct or unethical behaviour, you are expected to speak up.

KONGSBERG is committed to reviewing and, where appropriate, investigating all concerns raised by employees or third parties regarding unethical behaviour or potential misconduct. We have transparent, fair, and confidential procedures in place for raising concerns. We are committed to continuously improving our compliance systems, adapting to regulatory changes, incorporating best practices, and learning from both internal and external experiences.

Zero-retaliation

KONGSBERG expressly prohibits any form of retaliation against people who report a concern in good faith or against people participating in an investigation, regardless of whether the investigation was substantiated or not. Individuals that retaliate may be subject to disciplinary consequences. KONGSBERG is obligated to ensure that the reporter's working environment remains satisfactory during and after the process.

How to Raise a Concern

As a KONGSBERG employee, you can report Concerns through the following channels:

- The "Raising Concerns" portal in the KONGSBERG Compliance Management System or through our website.
- Phone service

- Your direct manager
- Your local HR representative
- The Division or Corporate Compliance Team
- The Ombudsmen

Third parties may also raise concerns via our website <https://www.kongsberg.com/our-commitment/raising-concerns>

Any non-compliance with this Code, KONGSBERG's governing documents and/or relevant laws and regulations, shall be followed up and consequences shall be consistent, predictable, and proportionate. Breaches of the law, our Code or our governance system may lead to disciplinary measures up to and including dismissal and may be reported to the relevant authorities where appropriate.

Any direct participation in corrupt activities, even if no benefit is received by the employee, will normally lead to termination of employment, and reported to authorities. Similarly applies to contractual parties, even if the corruption may not relate to business or other interaction with or for KONGSBERG.

8. Effective date

This document becomes operative from the date the document is signed by the CEO and authorised by the Board.

This document is the original English version. It is translated to various language versions. In case of discrepancy between the English language original text and the other language translations, the English text shall prevail.

9. Document history

Revision	Date	Change description
-	2004	First issue
A	AUG 2005	Periodic update to keep the Code relevant and aligned with evolving business practices.
B	24 APR 2008	Periodic update to keep the Code relevant and aligned with evolving business practices.
C	01OCT 2009	Periodic update to keep the Code relevant and aligned with evolving business practices.
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F	30JUN2016	Periodic update to keep the Code relevant and aligned with evolving business practices.
G	13FEB2019	Periodic update to keep the Code relevant and aligned with evolving business practices.
H	01JUL2022	Periodic update Main changes: Expanded and clarified coverage of: <ul style="list-style-type: none"> • anti-corruption and gifts/hospitality • conflicts of interest • data privacy and insider information • human rights and sustainability.
J	01JAN2026	Periodic update Main changes: <ul style="list-style-type: none"> • Clarify the Code as a fundamental part of our Corporate Governance. • Specifying procedure for raising concerns.
K	23APR2026	Update and approval in connection with demerger and listing of Kongsberg Maritime.