Code of Conduct Policy

To be a recognized **industry leader and trusted partner**, delivering **value** to the **energy** industry.



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Prepared by:	Tracey Simpson on 14 January 2026
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Document description:	This policy outlines MR Group’s Code of Conduct to help us to ensure that we do things safely, ethically and responsibly

Version history:

Revision	Reason for revision	Authorized by	Date
0.0	New document	Duco de Haan	7 Nov 2024
0.1	Reviewed for 2025 following MRM-No changes	Duco de Haan	20 Jan 2025
2.0	Full review and new ‘Harassment’ section added.	Duco de Haan	28 Jan 2026

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Policy

MR Group provides technical, engineering consultancy, and training services to the energy industry. Our corporate values guide all our actions, setting the standards for behaviour expected of MR Group personnel. This policy outlines essential principles to ensure integrity, responsibility, and professionalism across all operations.

The guiding principles that define the company's business philosophy are focussed on:

- Health, Safety and Security
- Information Management
- Conflicts of interests
- Financial integrity
- Loyalty
- Personal conduct
- Ethical behaviour
- Professionalism.

Health, Safety and Security

The health, safety, and security of our personnel and others affected by our activities is our highest priority. MR Group is committed to providing training, safety measures, and standards compliance to create a safe workplace.

Confidential Information and Intellectual Property

Personnel with access to confidential information must protect it from unauthorized disclosure, including information from previous employment. Confidentiality obligations continue after employment ends, in line with MR Group's policies. Refer to HR-POL-007 Intellectual Property Policy for details.

Conflicts of Interest

Personnel must avoid situations that create, or appear to create, a conflict of interest. Examples include accepting gifts beyond symbolic value or engaging in activities that compromise impartiality. Any secondary professional role must have CEO or Regional Director approval, and all conflicts should be disclosed to management or HR.

Financial integrity (including the giving or accepting of gifts)

MR Group's financial records must be accurate and transparent. Personnel are prohibited from engaging in unauthorized payments, with strict consequences for fraud. Any gift exceeding USD 50.00 (or local equivalent) must be recorded in the gift register and reported to management

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Loyalty

Personnel are expected to maintain loyalty to MR Group, avoiding actions that may damage its reputation, both during and after employment. All documents, data, and files must be returned upon termination.

Personal conduct

MR Group values a respectful, inclusive work environment. Personnel are expected to support our goals, respect diversity, and foster open communication and **collaboration.**

Ethical behaviour

Honesty, integrity, and respect are the foundation of MR Group's ethics. Discrimination, harassment, or any unethical behaviour is prohibited. Personnel may report ethical concerns directly to their manager or in the event that personnel are confronted with a potential ethical dilemma that they would rather not discuss with their direct manager, the Regional Director or CEO should be approached.

Professionalism

Professionalism is essential to MR Group's reputation. All personnel are expected to perform their duties with integrity, diligence, and respect in all interactions.

Compliance and Disciplinary Action

This policy is enforceable, and any breach of the Code of Conduct may result in disciplinary action in accordance with MR Group's disciplinary procedures and applicable local legislation. Disciplinary action will be fair, proportionate, and consistent, and may include corrective measures up to and including termination of employment or engagement, and where appropriate, legal proceedings.

MR Group does not and will not impose fines, financial penalties, or monetary deductions from wages, salary, or other remuneration as a form of disciplinary action. Disciplinary measures are intended to be corrective rather than punitive. Any adjustment to pay or remuneration will occur only where permitted by applicable law and in accordance with contractual terms (for example, where remuneration is linked to hours worked, approved leave, or variable compensation arrangements), and will not be used as a disciplinary sanction.

This Code of Conduct and associated disciplinary processes may be updated from time to time to ensure ongoing alignment with legal requirements, regulatory expectations, and best practices.

Harassment and Bullying

MR Group has a zero-tolerance approach to any form of harassment or workplace bullying. All personnel are entitled to a work environment that is professional, respectful, inclusive, and free from intimidation, hostility, or offensive behaviour.

Harassment may be verbal, physical, visual, or written, and includes but is not limited to conduct related to race, colour, nationality, ethnic origin, religion or belief, age, sex, gender identity or expression, sexual orientation, marital or parental status, disability, or any other characteristic protected by applicable law. Bullying includes repeated or unreasonable behaviour that creates a risk to health and safety or undermines an individual's dignity at work.

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Harassment or bullying by any personnel including employees, contractors, clients, or third parties, will not be tolerated under any circumstances. All concerns will be taken seriously and investigated promptly, confidentially, and fairly in accordance with MR Group's policies and applicable legislation.

Any substantiated breach of this standard will result in disciplinary action, up to and including termination of employment or engagement, and where appropriate, legal action.

Authorized by

Duco de Haan

Chief Executive Officer



28 January 2026

MR Group Holdings Limited

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