

CODE OF CONDUCT



RESPONSIBILITY

- + Honest
- + Accountable
- + Predictable

TOMRA is committed to doing business ethically and operates with zero-tolerance for corruption. TOMRA respects internationally recognized human rights principles.

Our employees are expected to promote TOMRA's core values by acting responsibly at all times.

AN OVERVIEW

1. SCOPE AND RESPONSIBILITY

TOMRA recognizes that our operations impact a range of stakeholder groups, including shareholders, employees and other business partners. To properly manage these relationships and ensure compliance with relevant laws and regulations, TOMRA has developed the Code of Conduct for TOMRA's employees and board members worldwide.

All employees (including temporary staff) and Board members are required to comply with TOMRA's Code of Conduct and other policies and guidelines. When unsure if an activity is acceptable, you should discuss with your line manager or another member of the management team.

Violations of the Code of Conduct will not be tolerated and may lead to disciplinary action.

2. REPORTING COMPLAINTS, CONCERNS AND "WHISTLE-BLOWING"

TOMRA encourages openness and transparency in all of our activities. Any concerns should first be raised with your line manager. Details of alternative contacts, including the local Human Resource and Group CR & Compliance Officer are provided in the full Code of Conduct.

Note that it is a breach of TOMRA's Code of Conduct to discriminate or harass anyone who reports a concern in good faith.

3. PERSONAL CONDUCT

As a TOMRA employee, you are expected to conduct business responsibly and show respect for business associates, colleagues and others, including different cultures and customs. TOMRA does not accept any form of harassment, violence, discrimination or other unacceptable behavior.

4. EQUAL OPPORTUNITIES

TOMRA is committed to an inclusive work culture and shall provide equal employment opportunity and treat all employees fairly.

TOMRA does not accept any form of harassment or discrimination on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, or veteran status.

5. CONFLICT OF INTEREST AND INTEGRITY

TOMRA's employees and Board Members shall not try to gain improper advantages for themselves or act in a manner that may harm TOMRA's interests.

Potential conflicts of interests must be notified to your line manager, including:

- + Financial interests in other companies
- + Activities with a supplier, competitor or other business associates (either personally or through a close relation)

TOMRA promotes a culture of zero tolerance for all forms of corruption.

- + See the Anti-bribery policy for full details of TOMRA's procedures for preventing bribery.
- + See the Gift & Entertainment policy for information on what can be provided and received.

Information, intellectual property and innovative ideas are valuable TOMRA assets that should be protected at all times.

- + See policies on IPR and Confidential Information for further information

Safeguarding assets and records of TOMRA, customers and other business associates is the responsibility of all TOMRA employees and other Company representatives.

6. COMPLIANCE

TOMRA is committed to doing business ethically and operates with zero-tolerance for corruption. TOMRA complies with all applicable laws and regulations in all areas where we conduct business, including applicable antitrust and competition laws.

It is not permitted to trade in TOMRA shares or give trading advice to others based on internal information that could influence the share price. When in doubt, contact the Group CFO.

+ See Insider Trading policy

TOMRA is committed to transparency and accuracy in all the Company's dealings. As a TOMRA employee, you are responsible for maintaining complete and accurate records of the Company's activities and business relations.

7. ENVIRONMENTAL PERFORMANCE

TOMRA promotes high standards for environmental performance. We are committed to minimizing the impact of our activities on the environment with methods that are socially responsible and sustainable. Our objective is to ensure that the positive environmental impacts created by TOMRA's operations are significantly greater than the negative impacts.

The complete Code of Conduct and other Group policies are available in the "Our Company" section of toGO.

8. RESPONDING TO ENQUIRIES FROM THE PRESS AND OTHER EXTERNAL STAKEHOLDERS

TOMRA's profile in domestic and international markets is greatly influenced by our ability to communicate consistently and professionally with external parties, including the media. As a result, TOMRA shall promote openness and honesty when dealing with interested parties outside TOMRA as well as society at large.

In order to ensure a coordinated interface with external parties, general enquiries about the Company or its employees, as well as all enquiries from the media, should be directed to a member of TOMRA Group Management or the Director PR. Enquiries from financial analysts or investors should be passed onto the Investor Relations Officer, the Group CFO or the CEO.

+ See (Communication Policy) for further information.



INNOVATION

Open-minded
Creative
Aiming for continuous
improvement

We always want to be
one step ahead.

We want to understand
our customers' needs
and are open to new
perspectives.

We aim at bringing
good ideas to life.

PASSION

Committed
Enthusiastic
Engaged

We have an inner drive
that makes us strive for
excellence.

We are driven by the
power of enthusiasm.

We build team spirit to
reach common goals.

RESPONSIBILITY

Honest
Accountable
Predictable

We want to be
responsive, trustworthy
and proactive in our
actions.

We aim at delivering
quality.

We take full
responsibility beyond
what is expected.