

# Hampiðjan Group's Code of Conduct

## **1 Application: Who must follow the Code of Conduct?**

The Code of Conduct applies to all employees of Hampiðjan hf and its subsidiaries (hereafter: Hampiðjan Group). The rules should promote honest and ethically correct behaviour of Hampiðjan Group and its employees.

Hampiðjan Group expects all parties concerned to familiarise themselves with the rules and to work according to them. As the Code of Conduct may not answer every questionable situation, all are expected to exercise good judgement, promptly seek advice, and report concerns about possible violations of the Code of Conduct as described in *Section 3 Follow up*.

## **2 Our ethical guidelines**

### **2.1 We do business according to the law and in an ethical manner.**

We comply with the laws and rules that apply to our activities at our locations and the policies and rules that Hampiðjan Group has set for itself. We do not accept any form of money laundering or terrorist financing and comply with all applicable laws prohibiting the same. Our employees shall take reasonable steps to prevent and detect any illegal form of payments and prevent Hampiðjan Group or any of its subsidiaries from financial transactions used by others to launder money.

Where differences exist between applicable laws, regulations, and our Code of Conduct and underlying policies, the strictest standard of behaviour shall prevail.

### **2.2 We respect human rights.**

At Hampiðjan Group, we perform business in line with basic human rights enshrined in the UN Declaration of Human Rights. Hampiðjan Group shall comply with internationally recognised human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work. Furthermore, we emphasise good relations with the local communities where we operate. For more information, please see *Hampiðjan Group's Human Rights Policy*.

### **2.3 We promote equality and diversity and have a zero-tolerance for discrimination.**

Hampiðjan Group creates a safe work environment that supports the general well-being of employees and provides equal opportunities for all.

No form of harassment, bullying, discrimination, or any other conduct which may be interpreted as threatening or degrading, shall ever be permitted.

#### **2.4 We safeguard our environment.**

We work to reduce the impact of our activities and our customers' activities on the environment and nature, e.g., with better use of resources, recycling, and a lower carbon footprint. For more information, see *Hampiðjan Group's Environmental Policy*.

#### **2.5 We do not tolerate any form of corruption and fraud.**

We do not tolerate any form of corruption or bribery, and only do business with suppliers or customers that Hampiðjan Group trusts. All gifts and invitations should be appropriate and reported to the immediate superior. All employees in the Hampiðjan Group shall comply with all applicable laws and regulations on bribery and corruption.

#### **2.6 We avoid situations where there is a conflict of interest.**

It is the duty of the employees to manage Hampiðjan Group's assets and funds carefully and only for the benefit of the company. Each and every employee must make sure that personal interests do not conflict with professional duties and confidentiality towards Hampiðjan Group and be careful to disclose other jobs and holdings in activities where there may be a risk of conflicts of interest to their manager. In cases of uncertainty or where impartiality might be compromised, managers shall be consulted.

#### **2.7 We compete fair and honest.**

We follow good business practices characterised by professionalism, honesty, and fairness. We do not enter into any agreements or understandings with competitors or other market players or engage in any conduct that undermines fair competition. We maintain confidentiality as regards all trade secrets, competition-sensitive or other non-public information about Hampiðjan Group and any business partners which we gain access to as part of our work for Hampiðjan Group.

#### **2.8 We do not trade in financial instruments based on inside information.**

We comply with applicable laws and regulations regarding securities trading and should under no circumstances purchase or sell financial securities based on inside information, advise others to do the same, or communicate inside information to unauthorised parties.

#### **2.9 Compliance with National and International Sanctions**

At Hampiðjan Group, we comply with all applicable, national, and international sanctions.

### **3 Follow-up.**

Any Hampiðjan Group personnel who observes a possible violation of the Code of Conduct, other underlying policies, and/or applicable laws and regulations shall report their concern immediately.

Individuals who fail to comply with the Code of Conduct, including those who fail to report Code violations, may face disciplinary action, including termination.

Questions or concerns regarding ethical and compliant conduct shall be reported to one's immediate supervisor whenever this is appropriate. Any employee may also report breaches, or suspects of possible breaches, through the process described in the *Hampiđjan Group's Procedure for Reporting (Whistleblowing) and Handling of Non-Conformities*. It is Hampiđjan Group's policy to prohibit any retaliation in all forms towards whistleblowers who report in good faith.