



Hafnia Code of Conduct

We are Hafnia

Putting **people-first** and **challenging the industry of today**
to deliver **a better tomorrow**

Hafnia Code of Conduct Employees

Correct as of **November 2024**

CONTENTS

| | | |
|-------|---|---------------------------|
| | <u>Hafnia Conduct Expectations</u> | <u>3</u> |
| 1 | SPEAK UP | <u>4</u> |
| 1.1 | <u>Whistleblowing</u> | <u>4</u> |
| 2 | PEOPLE | <u>5</u> |
| 2.1 | <u>Health and Safety</u> | <u>5</u> |
| 2.2 | <u>Human Rights</u> | <u>5</u> |
| 2.2.1 | <u>Diversity, Inclusion, Belonging and Equity (DIBE) Policy</u> | <u>5</u> |
| 2.2.2 | <u>Anti-Harassing & Anti-Bullying</u> | <u>6</u> |
| 2.3 | <u>Conflict of Interest and Relationships at Work</u> | <u>6</u> |
| 3 | BUSINESS CONDUCT COMPLIANCE | <u>7</u> |
| 3.1 | <u>Anti-Bribery & Anti-Corruption</u> | <u>7</u> |
| 3.1.1 | <u>Antitrust & Anti-Competition</u> | <u>8</u> |
| 3.2 | <u>Sanctions</u> | <u>8</u> |
| 4 | DATA AND IT | <u>9</u> |
| 4.1 | <u>General Data Protection Regulation (GDPR)</u> | <u>9</u> |
| 4.2 | <u>Cyber-Security</u> | <u>9</u> |
| 5 | FINANCE | <u>10</u> |
| 5.1 | <u>Insider Trading</u> | <u>10</u> |
| 5.2 | <u>Anti-Money Laundering (AML)</u> | <u>10</u> |
| 6 | SUSTAINABILITY | <u>11</u> |
| 6.1 | <u>Environment & Sustainability</u> | <u>11</u> |

CONDUCTING YOURSELF WITHIN HAFNIA

ALWAYS PEOPLE-FIRST

#WeAreHafnia

The Hafnia Code of Conduct is a key way that we put our **CARE (Collaborative, Ambitious, Reliable, Enduring)** values into action. It is shaped not only by our leadership but also by our employees, who define Hafnia's culture and set the highest standards for how we conduct business. We set high expectations not just to excel in our industry but also for practical reasons.

High standards enable us to hire the best talent, provide exceptional service to our customers, and implement a forward-thinking business strategy.

At Hafnia, we empower everyone to take ownership of their work, with each person contributing to our success. Our People-First approach emphasises that everyone has a personal responsibility to embody our values and conduct themselves in a way that demonstrates collaboration, ambition, reliability, and endurance. As you review these guidelines, we encourage you to reflect on how you can contribute and apply them in your roles.

We are all guardians of this policy, and it is our collective duty to uphold it for ourselves, for the company, and to follow the law.

Consistently and appropriately maintaining these codes is our shared responsibility. Breaching them may result in disciplinary action, including termination and potential legal consequences from Hafnia.

Hafnia Conduct Expectations:

The Hafnia Code of Conduct applies to all Hafnia employees, both onshore and at sea, as well as to our Board Members. It also extends to members of our extended workforce, including contractors who frequently work with us or are temporarily assigned to our employment (secondees).

How do I Contribute to This?



- Take ownership of your role in shaping Hafnia's performance and reputation.
- Maintain professionalism in all aspects of your work and ensure compliance with all policies, legal requirements, regulations, and professional standards.
- Embrace honesty and trustworthiness to set a positive example.
- Treat colleagues and business partners with respect, courtesy, dignity, and fairness.
- Foster a safe workplace free from discrimination, harassment, and any form of retaliation.
- Prioritise adherence to all health and safety recommendations.
- Transparently declare any gifts given or received, by our compliance policy.
- Speak up and report any incidents, risks, or issues that violate company policy without hesitation.

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1. SPEAK UP

At Hafnia, we promote a culture of open communication and welcome input from everyone, regardless of your role. We encourage you to ask questions or raise concerns if you're ever unsure about how to apply our standards in a specific situation or if you suspect a potential violation. Your voice matters, and we want to hear from you. Don't hesitate to speak up.

Channels

There are several ways for you to raise concerns, depending on the nature of the issue and your comfort level. If you're unsure which channel to use, the People, Culture & Strategy Team is available to guide you.

Here are the options for expressing your concerns:

- Your manager
- The compliance program responsible or compliance owner (a full list is available on Hafnia Daily)
- Any member of the People, Culture & Strategy Team (for office staff)
- Any member of the Crewing, HSEQ, or Marine Team (for seafarers)
- The Hafnia Whistleblowing system (ensure you use this platform for suitable scenarios)

1.1 Whistleblowing

Hafnia is committed to protecting stakeholders who report potential or actual ethical breaches within the company from any form of reprisal or victimisation.

However, it's important to note that the Whistleblowing process is not for employees to raise personal grievances, which should be addressed through a separate protocol involving their managers or designated personnel.

Whistleblowing applies to any concerns or actions that could affect Hafnia, as outlined in the [Whistleblowing Policy](#).

The Whistleblower system is hosted on a secure external website, available 24/7 and in multiple languages.

You can also raise concerns by phone. Reporting can be done anonymously, and all cases are kept confidential, whether you choose to share your name. However, if required by law or deemed essential to the investigation, the whistleblower's identity (if known) may be disclosed.

Click here: [Hafnia Whistleblowing Platform](#) to visit the Hafnia Whistleblower system.

How do I Contribute to This?

- Always speak up!
- Always recognise the importance of reporting concerns about unethical, illegal, or inappropriate behaviour.



Key Things to Remember



- You are protected: Hafnia prohibits any form of retaliation against whistleblowers. We prioritise confidentiality and make every effort to safeguard their identity.
- We utilise an independent whistleblowing reporting site and hotline provider, ensuring anonymity, security, and ease of use.
- External Reporting: If employees decide to report to government authorities, the media, or the public, it should be done in good faith, in the interest of public concern, and only after all internal reporting options have been exhausted.

2. PEOPLE

2.1 Health and Safety

Hafnia is committed to achieving Zero Harm to people and the environment it operates in.

How do I Contribute to This?



- Always prioritise safety!
- Familiarise yourself with our HSEQ policy and Employee Guidebooks to ensure a healthy, safe, and secure workplace.

More information on **Hafnia's HSEQ Policy** can be found [here](#).

2.2 Human Rights

Hafnia has a zero-tolerance policy for any violations of human rights and is committed to maintaining a workplace free from modern slavery and other human rights abuses. We fully support the principles of the United Nations Universal Declaration of Human Rights and follow the guidelines set by the International Labour Organization.

For more information, you can refer to [Hafnia's Human Rights Policy](#).

2.2.1 Diversity, Inclusion, Belonging, and Equity (DIBE) Policy

Hafnia embraces differences in age, nationality, gender identity, sexual orientation, ability/disability, background, and other characteristics that make our employees unique. We believe the collective sum of our individual differences represents a significant part of our company culture, and that a true cultural melting point is what contributes to our people-first and market-leading position. Realising difference and being accepting of it is important but is not enough.

Hafnia only accepts and aims for a working environment where people always feel that they are included and belong. We invite diverse thoughts, ideas, and perspectives and we strive to make sure people can be their true selves at work. We are also committed to ensuring all our work practices are fair.

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How do I Contribute to This?



- Always support one another, reject harassment, and maintain transparency in your interactions.
- If you are a bystander, get involved!

Key Things to Remember



- Everyone matters – we all need to be involved in encouraging a culture of DIBE.

For more information, you can refer to [Hafnia's DIBE Policy](#).

2.2.2 Anti-Harassment & Anti-Bullying

Hafnia is fully committed to providing a respectful, discrimination-free workplace. We do not tolerate any form of unlawful discrimination, bullying, harassment, or retaliation.

How do I Contribute to This?



- Always prioritise dignity, decency, and trust.
- Ensure there is no room for intimidation, oppression, or exploitation.

Key Things to Remember



- Speak up and report any misconduct immediately.
- Individuals who report misconduct or participate in an investigation will not face retaliation.

For more information, you can refer to [Hafnia's Anti-Harassment & Anti-Bullying Policy](#).

2.3 Conflict of Interest and Relationships at Work

As a Hafnia employee, you are expected to always act in the best interests of the company. However, conflicts of interest can arise when personal interests influence decisions, potentially compromising Hafnia's interests. It is important to disclose any personal interests that could reasonably be seen as affecting your decision-making.

A conflict of interest doesn't necessarily require stopping the activity; often, it can be managed through transparency and disclosure. Steps can then be taken to resolve or handle the situation appropriately.

Examples of conflicts of interest include:

- Romantic relationships with colleagues
- Personal friendships with third-party vendors
- Favouring friends or family members during the hiring process for personal gain

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Hafnia may reassign employees to different roles or teams if conflicts of interest arise. All conflicts should be reported via MyHR, supporting our commitment to transparency and ethical behaviour.

How do I Contribute to This?



- Always disclose any personal relationships, ownership, or business interests, whether direct or indirect.

3. BUSINESS CONDUCT COMPLIANCE

3.1 Anti-Bribery & Anti-Corruption

Hafnia has a zero-tolerance policy towards facilitation payments or gifts, except in situations of duress.

Gift & Entertainment Guidelines

At Hafnia, we promote responsible and respectful behaviour regarding the giving and receiving of gifts and entertainment to ensure that it aligns with our values and ethical principles.

How do I Contribute to This?



- Always act in Hafnia's best interests and avoid compromising situations.
- Maintain a zero-tolerance policy for gifts and payments; reject any gifts or payments intended to influence business decisions, unless under duress.
- When giving or receiving gifts and entertainment, consider whether they align with normal business practices (e.g. expressing condolences, congratulatory gifts, occasional lunches or dinners, and invitations to cultural events).

Key Things to Remember



- Employees must not use their positions at Hafnia for personal gain.
- Hafnia does not support causes associated with political agendas or corruption and is committed to maintaining transparency and ethics in all our operations.
- Gifts or corporate entertainment valued at more than USD 400 (or its equivalent) received or gifted must be reported to the People, Culture & Strategy Team using the Gift Declaration Form in MyHR. This process ensures that our relationships with Business Associates are based on mutual respect, ethical behaviour, and transparency, in alignment with our values.

For more information, you can refer to [Hafnia's Anti-Bribery & Anti-Corruption Policy](#).

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3.1.1 Antitrust & Anti-Competition

At Hafnia, we are committed to ensuring that everyone understands and adheres to our antitrust compliance regulations to maintain fair competition. This includes the requirement to disclose sensitive business information, such as pricing, strategies, and contract terms.

How do I Contribute to This?



- Never provide, request, or discuss competitively strategic information with competitors, including Pool Partners.
- Make decisions that are transparent, market-driven, and independent of any collusion or anti-competitive agreements with competitors and suppliers.
- Report any potential antitrust violations, suspicions of unlawful behaviour, or concerns about competitive practices through the established reporting or whistleblowing channels.

Key Things to Remember



- Non-compliance with the Company's Antitrust Policy can result in severe legal and financial consequences for both the Company and the individuals involved.

For more information, you can refer to [Hafnia's Antitrust & Anti-Competition Policy](#) on our policy section on our intranet or website.

3.2 Sanctions

At Hafnia, our core values include ethical conduct and compliance with all relevant sanctions, laws, and regulations.

How do I Contribute to This?



- Never participate in any activity involving parties that are listed or prohibited by applicable sanction laws.
- Always adhere to internal controls and procedures before engaging with a new counterparty.
- Never agree to modify any document to conceal the identity of a party or goods that are intended for a sanctioned party or country, or that are subject to export controls.

Key Things to Remember



- Employees should follow internal controls and procedures to reduce and eliminate risks.
- If in doubt, ask a colleague, raise to a manager or contact a member of the Sanctions Compliance Committee (SCC).

For more information, you can refer to [Hafnia's Sanctions Policy](#).

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4. DATA AND IT

4.1 General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a legal framework that enhances your control and privacy regarding personal data collection. It requires Hafnia to protect the information we collect, whether during recruitment or in our administrative processes.

How do I Contribute to This?



- Exercise caution when sharing personal data within Hafnia.
- If you accidentally share confidential or sensitive personal data with the wrong recipient, report it immediately to the GDPR Compliance Officer.
- Contact the GDPR Compliance Officer right away in case of any breach, as it must be reported to the authorities within 72 hours.

Key Things to Remember



- Hafnia only collects necessary information with your consent and retains data for a regulated period before securely deleting it.
- GDPR applies to EU citizens, both within and outside the EU. At Hafnia, we apply the same policy to all employees, regardless of nationality.

For more information, you can refer to [Hafnia's Personal Data Protection Policy](#).

4.2 Cyber-Security

Due to rising cyber threats and phishing attacks, all employees are expected to stay vigilant and follow the guidelines below established by our IT department to enhance our cyber defence. At Hafnia, we have a strict policy: **never click on links or attachments from unknown email addresses.**

Key Things to Remember



- Always verify email addresses to ensure they are authentic.
- Report anything that seems suspicious using the built-in email alert system, Hoxhunt.
- Never submit personal or sensitive information via email.
- If you're unsure about any suspicious IT activities, always consult a member of the IT department.

5. FINANCE

5.1 Insider Trading

At Hafnia, we prioritize transparency and ethical conduct. To support these values, we have implemented an insider trading blackout period for employees and "Insiders" (The CEO, CFO and Board members).

How do I Contribute to This?



- Do not trade our securities based on material, non-public information, and do not disclose such information to others.
- Comply with all relevant securities laws and regulations.

Key Things to Remember



- The blackout period starts 30 days before our quarterly earnings release. During this time, "Primary Insiders" are required to refrain from trading Financial Instruments or encouraging others to do so.
- Violating this policy may result in disciplinary action, including legal consequences.

For more information, you can refer to [Hafnia's Insider Trading Policy](#).

5.2 Anti-Money Laundering (AML)

At Hafnia, we are dedicated to preventing money laundering and conduct all our business in line with strong ethical principles and applicable Anti-Money Laundering laws.

How do I Contribute to This?



- Never participate in any transaction that you know, or should reasonably suspect, involves money laundering.
- Always adhere to internal controls and procedures when conducting any transaction with a counterparty.
- Report any suspicions of potential money laundering activities to your immediate manager, the AML contact, or through the Whistleblowing platform.

For more information, you can refer to [Hafnia's AML Policy](#).

6. SUSTAINABILITY

6.1 Environment & Sustainability

At Hafnia, we are committed to protecting the environment, minimising our ecological footprint, and promoting sustainable practices in maritime energy transportation.

For more information, you can refer to [Hafnia's Environmental and Sustainability Policy](#).

How do I Contribute to This?



- Continuously work to reduce harmful emissions to the sea, air, and land.
- Ensure our business partners share our commitment to environmental protection and comply with regulations.
- Conduct all tasks with a focus on environmental responsibility.
- Take a comprehensive approach to energy management by implementing energy-saving strategies, technologies, and best operational practices.
- Follow sustainable practices to align with the United Nations Sustainable Development Goals.

End of Document

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