



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 2025**

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CONDUCTING YOURSELF WITHIN HAFNIA

ALWAYS PEOPLE-FIRST

#WeAreHafnia

The Hafnia Code of Conduct is how we put our **CARE (Collaborative, Ambitious, Reliable, Enduring)** values into action.

It shapes how we define Hafnia's culture and sets the highest standards for how we conduct business.

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

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. Breaching our Code of Conduct may result in disciplinary action, including termination and potential legal proceedings by Hafnia.

Hafnia: A People-First Company

Being a People First company means valuing our team members as our greatest assets and ensuring that everyone is empowered to grow, learn, and contribute meaningfully.

We invest in team development both onshore and at sea, for continual progression to drive both personal and professional success. We cultivate a culture of psychological safety, where everyone is encouraged to share ideas, make decisions, and take the right risks, and opportunities, in a supportive environment. Afterall, we recognize that Hafnia thrives when we succeed together as a team.

People-First is also about balance. It does not mean prioritizing individuals at the expense of business outcomes, performance, or accountability. Nor does it mean avoiding difficult decisions or resisting necessary change.

Instead, we embrace a people-centred approach that promotes growth while maintaining excellence, adaptability, and shared responsibility.

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 applies to members of our extended workforce, including contractors, and secondees.

How do I Contribute to This?



- Act responsibly for shaping Hafnia's performance and reputation.
- Maintain professionalism and ensure compliance with all policies, legal requirements, regulations, and professional standards.
- Embrace honesty and trustworthiness to set a positive example.
- Treat people with **respect, courtesy, dignity, and fairness**.
- Foster a safe workplace free from discrimination, harassment, and any form of retaliation.
- Adhere to all health and safety recommendations.
- Transparently declare any gifts given or received, as per our Anti-Bribery & Anti-Corruption policy.
- Speak up and report any incidents, risks, or issues that violate company policy.

1. SPEAK UP

At Hafnia, we promote a culture of open communication and welcome input from everyone. We encourage you to ask questions or raise concerns even if you are unsure whether our standards apply in a specific situation or if you suspect a potential violation. Your voice matters, and we want to hear from you.

Channels

There are several ways for you to raise concerns, depending on the nature of the issue and your comfort level.

Here are the options for expressing your concerns:

- Your Manager
- The Governance, Risk & Compliance team or compliance topic owner
- The Head of the People, Culture & Strategy Team or any Regional Heads (for office staff)
- Any member of the Crewing, HSEQ, or Marine Team (for seafarers)
- Hafnia's Whistleblowing Platform

1.1 Whistleblowing

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

The Whistleblower system is hosted on a secure external website, available 24/7 and in multiple languages. You can also raise concerns by phone.

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

How do I Contribute to This?



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

Key Things to Remember



- You are protected: Reporting can be done anonymously and 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. 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.

Hafnia constantly strives for a working environment where people feel that they are included and belong and most importantly, can be their authentic selves. We are also committed to ensuring all our work practices are fair.

How do I Contribute to This?



- Always support one another, reject harassment, and maintain transparency in your interactions.
- Be your authentic selves, always ensuring that your expression of that identity is respectful and aligns with our values.

Key Things to Remember



- DIBE is everyone's responsibility and is not managed by one team alone. We all need to be involved and responsible for driving our DIBE culture.

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 prioritize 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. Hafnia may reassign employees to different roles or teams if a conflict of interest should arise. All conflicts should be reported to People, Culture & Strategy or our Crewing Team.

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

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.
- When sending gifts to customers, it is always a good idea to pre-check this both with Hafnia's Communication and Branding Team and the receiver's compliance team.

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](#).

3.2 Antitrust & Anti-Competition

At Hafnia, we are committed to ensuring that everyone understands and adheres to our antitrust policy to maintain fair competition.

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.

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 website.

3.3 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](#).

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.
- In case of any breach, or if you accidentally share confidential or sensitive personal data with the wrong recipient, report it immediately to the Data Protection Officer.

Key Things to Remember



- Hafnia only collects necessary information with your consent and retains data for a regulated period before securely deleting it.

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

4.2 Cyber-Security

All employees are expected to stay vigilant and follow the guidelines 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 are unsure about any suspicious IT activities, always consult a member of the IT department.

5. FINANCE

5.1 Insider Trading

At Hafnia, we are committed to ensuring fair and transparent trading in our securities. To uphold market integrity and prevent the misuse of confidential information, we have implemented an insider trading blackout period for employees and other designated "Insiders."

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, employees are informed via the intranet and an email.
- Employees are required to refrain from trading Hafnia securities 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, minimizing 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?



- Ensure our business partners share our commitment to environmental protection and comply with regulations.
- Focus on your individual environmental responsibility.
- Take a comprehensive approach to energy management by implementing energy-saving strategies, technologies, and best operational practices.

End of Document

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