

# CODE OF CONDUCT

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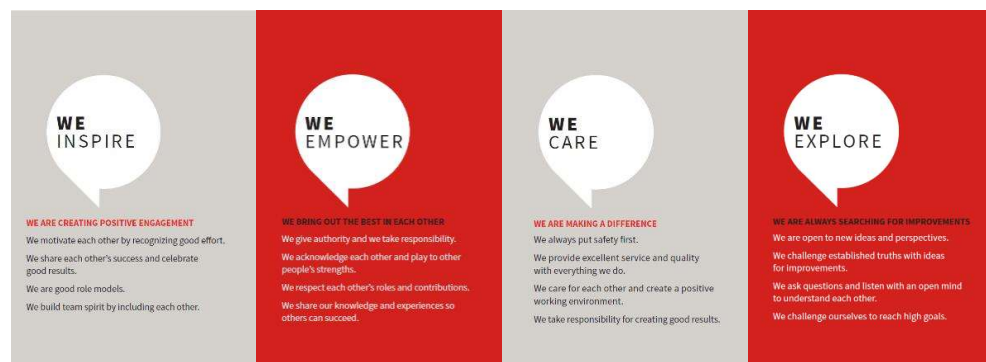
# 1 WE@HURTIGRUTENGROUP

## 1.1 OUR VALUES AND CODE OF CONDUCT

Our Code of Conduct and our values form the expectations, obligations and requirements that must be met by each individual employee and our corporate culture regarding behaviour.

Our values and our Code of Conduct apply to our owners, board members, all employees, contracted workers and suppliers.

Our core values shall be reflected in the way we conduct ourselves towards colleagues, guests, suppliers and partners, and society as a whole. Our values are characterised by a WE culture, which will help us reach our goal of becoming a World Leader in Exploration Travel:



Our Code of Conduct reflects our values, but also includes the most important expectations and requirements regarding our behaviour in situations where ethical dilemmas may arise. It is expected that each individual makes their own judgements based on the guidelines and values set out in this document.

## 1.2 YOUR RESPONSIBILITY

We have stringent requirements regarding ethics and values that apply to everyone who works in Hurtigruten Group and who acts on behalf of Hurtigruten Group.

It is everyone's responsibility to see that the values and ethical standards are complied with. It is therefore expected that each individual employee familiarises themselves with these values and the Code of Conduct. It is expected that you act in line with this Code of Conduct and that you seek advice from colleagues or a superior if you find yourself in a 'grey area' or in situations that you are unsure how to handle.

Most importantly, however, is that you spend some time considering our values and the Code of Conduct so that you do not make hasty decisions that can reflect badly on yourself and Hurtigruten Group, and in the worst case, make us as a company or you as an individual break the law.

**Reporting Misconduct**

If you suspect breach of our values or the Code of Conduct, you have a duty to report this immediately to your superior. If he or she is involved in the breach or if, for other reasons, it is not possible to report the deviation to your superior, you can contact HR, the head office or safety delegate.

In cases where notification does not lead to the matter being resolved, or the whistle-blower does not want to report the matter in the usual way, the breach should be reported in accordance with our procedures for reporting misconduct in Hurtigruten.

## 2 HURTIGRUTEN GROUP'S CODE OF CONDUCT

### 2.1 LOYALTY AND BEHAVIOUR IN PUBLIC

As an employee of Hurtigruten Group n, you must be aware of how you conduct yourself in relation to the public, particularly when you act on behalf of your employer, but also as a private individual.

It is also important to show diligence in relation to commenting on or sharing news about Hurtigruten Group, or politically controversial matters, in social media or through other channels. Always think about how your updates about and from your work situation, both digitally and through other channels, can be interpreted, including by people other than your friends and acquaintances.

Employees of Hurtigruten Group must not participate in advertisements for external products or suppliers with an obvious connection to Hurtigruten Group n, without approval from the management.

We are ambassadors for Hurtigruten at all times.

#### Examples of situations:

- You are an active local politician and are to give a speech about a delicate matter in your home town. You are wearing a uniform that clearly reveals that you work in Hurtigruten Group. How do you feel about this?
- After 22 long and hectic days on board, you are finally due for some time off. A group of you leave the vessel in Trondheim and go out in the afternoon for a well-deserved beer or two. You notice that one of your colleagues is wearing a CREW jacket. What do you do?
- Later that evening, you notice that your colleague has posted photos from the party on Instagram using the #hurtigruten hashtag. How do you feel about this?
- A colleague is tired of her job and is worn-out after a long season. She is also involved in an ongoing conflict with her manager. On her Facebook profile, she writes: 'I hate my job and my boss [name] is a real [bad word].' How would you handle this?
- As a frequent debater of social issues and politics, you are engaged in a lot of current issues in your home town. You personally disagree with a matter that Hurtigruten Group has been advocating for many years, and you have now been asked to give a speech about this matter based on your private opinion. What do you do?

These are just some examples of situations. Other similar situations can also influence your impartiality and loyalty.

#### If you are in doubt about your impartiality, consider the following:

- Will I have problems defending my statements in front of my colleagues and superior?
- Could it be assumed that I am speaking on behalf of Hurtigruten Group when I am speaking my own mind? Even if you believe that this distinction is obvious, the deciding factor is how other people perceive it. This is particularly tricky with regards to social media.

If you answered 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## 2.2 SEXUAL HARASSMENT

As managers and co-workers in Hurtigruten Group, we do not tolerate any form of sexual harassment. This includes unwanted physical contact and the use of sexual language and body language, both directly towards the person in question and when referring to each other.

The threshold for what can be regarded as acts of a sexual nature is individual, but we are all responsible for ensuring that no one perceives their working environment as inappropriate. Our actions must reflect acceptable behaviour in society at large.

As an employee, you have a right and a duty to directly notify, or report, if you or another person is experiencing sexual harassment.

### Examples of situations:

- Images showing nudity are displayed on the walls at work, both in work areas, toilets etc. What do you do?
- You witness a manager touching a subordinate's behind. The person in question moves away, but at the same time laughs it off. What do you do?
- A colleague comments about one of our new employees who has just started and says, 'Did you see that girl/guy who started today? What a body!' How would you respond to a comment of this nature?
- You see a colleague making gestures of a sexual nature behind another colleague's back. How would you respond?

If you are in doubt about whether you have contributed to or witnessed sexual harassment, consider the following:

- Could I do or say that to my partner/spouse?
- Could I do or say that to my friends or my children?
- Is what I or others do or say relevant for the person in question's role or contribution?
- Could I do or say that in front of my colleagues?

If you answer 'no' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## 2.3 GENDER EQUALITY

All employees of Hurtigruten shall be given equal opportunities for employment and professional development, regardless of their gender, ethnic and cultural background, religion, age, sexual orientation, functional ability, and political view.

For more information, please see our Gender Equality policy attached. (pdf on the right) )

## 2.4 WORKING ENVIRONMENT AND BULLYING

In Hurtigruten Group we want everyone to succeed and enjoy their work, and none of our employees should feel excluded or bullied in the workplace. As an employee, you respect other people's roles and contributions by cooperating with others in a constructive manner. You share your experience and knowledge with others so that, together, we can succeed even better.

You have a right and a duty to report if you or another person is being bullied. Reporting that you or another person has been bullied shall not lead to negative consequences.

**Examples of situations:**

- During lunch, there is negative talk of a colleague who is not present. What do you do?
- At a departmental meeting, the same person is ignored by his/her superior and other key participants time after time. The person in question attempts to contribute to the meeting but is overlooked. What do you do?
- You witness one of your colleagues having a violent outbreak of anger and acting in a threatening manner towards one of our partners. How would you handle this?
- You experience bullying by your own superior through the person in question ignoring you, making harassing statements and behaving in a negative manner towards you. What do you do?
- Over dinner, you overhear your colleagues talking about other departments, **sections**, or other parts of the business group in a negative manner. How would you handle this?
- One of your colleagues is ridiculed in social media by a picture being posted of him/her in a situation where they have not given their permission to be photographed, for example while he/she was asleep. What do you do?

**If you are in doubt about whether you or another person negatively influences the working environment in Hurtigruten Group n, or engages in bullying, consider the following:**

- Does my behaviour contribute to creating positive engagement?
- Do I talk to the people in question instead of talking about them behind their backs with others?
- Do I think about encouraging a 'we' culture in the way I behave towards and talk about others?

If you answer 'no' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## **2.5 IMPARTIALITY**

As a board member, manager or employee of Hurtigruten Group n, you must be aware of situations where questions can be raised about your integrity or independence. The company's interests must always come before personal or other external interests.

No one must participate in or attempt to influence decision-making processes where circumstances exist that can be assumed to weaken trust in our independence. If a situation of this nature arises, you must immediately report the matter to your immediate superior.

**Examples of situations:**

- You are responsible for choosing the salmon supplier for Hurtigruten Group. A good friend of yours is the marketing manager in one of the companies participating in the tendering process. What do you do?
- You are going to recruit a new able seafarer to the vessel you work on. You are informed that one of the applicants is your superior's stepson. What do you do?
- During your time off, you receive pay from a supplier. The supplier's manager asks you for advice in connection with a tender submission for Hurtigruten Group n. What do you do?
- You hold an office in a political party that wants Hurtigruten Group to call at a port in its municipality and you are asked to evaluate the proposal. What do you do?

**If you are in doubt about your impartiality, consider the following situation:**

- Will you or a related party gain direct or indirect financial or other personal advantages through the outcome of the matter?
- Is your superior disqualified from considering a matter that you are responsible for deciding or considering?
- Would I have problems publicly defending my decision?
- It is not necessarily you who decides your impartiality, but the people around you. Is it possible that other people view the matter differently from you?

If you answer 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## **2.6 GIFTS AND HOSPITALITY**

Both parties are obligated to remain loyal to the other party's interests. Mutual trust between the parties is presumed, and as a result of this the employee has a general obligation to loyally promote the employer's interests.

Employees of Hurtigruten Group must not accept gifts other than promotional items of a minimal value.

As an employee of Hurtigruten Group, you may accept hospitality in the form of social gatherings, meals or entertainment if these are obviously work-related. The cost of such hospitality must be kept within reasonable limits. Travel, accommodation and other expenses for employees in connection with this type of hospitality shall always be paid for by Hurtigruten Group.

The above principles also apply the other way round, meaning that when you as an employee act on behalf of the company, you may not offer to or accept to pay for gifts, hospitality or cover other expenses for customers, suppliers and other partners that will entail a breach of these guidelines.

**Examples of situations:**

- A supplier invites you to come on a customer weekend in London, with all expenses paid. What do you do?
- You receive a gift of high value as thanks for the deal and cooperation. What do you do?

- You hear that the entire management group of one of our most important partners has been invited on a golfing holiday in Spain by our sales department. What do you do?

If you are in doubt about whether you or another person has acted correctly, consider the following:

- Would others have questioned the morality of the action internally and externally?
- Would you have problems telling others about it?

If you answer 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## 2.7 CORRUPTION

If you are acting on behalf of Hurtigruten Group, you must not carry out acts of corruption for the purpose of influencing or speeding up procedures. Corruption undermines lawful business operations, distorts competition, destroys reputation and puts both the company and individuals at risk. Hurtigruten Group deplores all forms of corruption and works actively to ensure that corruption does not occur in our business operations.

If someone believes that their own or another person's life or health could be in danger, however, facilitation payment may be allowed. In such cases, payments must be correctly described in the accounts and reported to the manager of the business area as soon as possible.

Hurtigruten Group can be held liable for bribery or other acts of corruption carried out by a third party under contract with Hurtigruten Group n, or in other situations in which Hurtigruten Group can benefit from bribery or acts of corruption carried out by a third party.

Examples of situations:

- You are the captain of an Explorer vessel. The pilot asks for a sum of money to allow you to dock. What do you do?
- You suspect that a colleague is receiving money so that Hurtigruten Group will do business with the supplier. What do you do?

If you are in doubt about whether you or another person has acted correctly, consider the following:

- Does the payment or service give you or **other** advantages that you are not entitled to?
- Would others have questioned the morality of the action internally and externally?
- Would you have problems telling others about it?

If you answer 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## 2.8 CONFIDENTIALITY AND DUTY OF SECRECY

All employees of Hurtigruten Group n and our business connections have a duty of secrecy regarding circumstances that we learn about and that concern the company, our customers and their business

connections. Information about the company that can hurt the company's reputation if it falls into the wrong hands is deemed to be confidential.

All information provided in connection with Hurtigruten Group's operations must be correct and reliable, and must only be given by authorised persons.

The duty of secrecy does not only apply externally, but also internally regarding other employees who are not involved in the matter. The duty of secrecy also applies after the employment relationship has ended.

#### Examples of situations:

- You work in the Operations Department in Hurtigruten Group and are sitting with some friends. They ask you a question about a newbuild project that has just started up, which you are involved in. What do you reply?
- As a manager, you are involved in a personnel matter in your own department. Another manager asks you for details about the case. How would you handle this?
- In the middle of a recruitment process, a colleague asks you about internal applicants for the position. How do you approach this situation?

**If you are in doubt about whether you or others are disclosing confidential information, consider the following:**

- Am I maintaining the company's reputation when I say this?
- Has what I am saying already been made public through the media or other official channels?
- Am I authorised to disclose this information to outsiders?
- Am I certain that the information I am about to disclose is available to everyone?

If you answer 'no' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior. If you are unsure whether the information you have received is confidential, you should ask the source to what extent and to whom you can disclose the information.

## 2.9 BUSINESS REPORTING

Hurtigruten Group is obliged to report its business information in a way that provides complete, correct, precise and easily understandable accounts in periodical financial statements, and other documents sent to supervisory authorities and offices, and in other official correspondence.

The information given must be correct, precise, and give a detailed description of the company's assets, liabilities, revenues and expenses. All transactions must be documented in a comprehensive manner.

#### Examples of situations:

- You discover that documentation is lacking for an expense item in the accounts. What do you do?
- In connection with an audit, a colleague asks you to provide information that you know to be incorrect in relation to the actual situation. What do you do?
- In a financial report, you notice that someone has left out an important expense item. What do you do?

If you are in doubt about whether you or others have reported correctly, consider the following:

- Are you sure that the information comes from the correct source?
- Does the information provide a correct picture of the actual situation?
- If someone were to check the information, could they find that it is misleading?

If you answer 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## 2.10 OFFENCES

Employees of Hurtigruten Group and our business connections must not act in breach of Norwegian law or other recognised international commitments, including on journeys and in connection with operations abroad. As long as we are representing Hurtigruten Group, we must follow Norwegian regulations.

Examples of situations:

- Hurtigruten Group has started up a new route to Amsterdam. In the port in Amsterdam, you are offered to buy cannabis, which is a legal drug in the country. What do you do?
- You discover that a guest on board is selling sexual services to other guests on board. What do you do?
- A colleague says that he is going to buy sexual services in the next port. What do you do?
- You suspect that a colleague is using illegal substances while on duty. What do you do?
- This is not an exhaustive list, but applies to all offences.

If you are in doubt about whether you or others have acted in breach of the law, consider the following:

- Is the act you are about to commit or observe in breach of Norwegian law?
- Would others have questioned the morality of the act?
- Would you have problems telling others about the act?

If you answer 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## 2.11 SUBSTANCE ABUSE

The safety of our passengers and employees is Hurtigruten Group's top priority. Therefore, Hurtigruten Group has a zero tolerance policy concerning the possession, use and distribution of intoxicating substances by maritime employees serving on board our ships and by onshore employees within ordinary working hours and during duty periods.

By intoxicating substances is meant alcohol, doping preparations, substances registered on the narcotics list and substances with similar effects. Note that unauthorised use of prescription drugs that are on the narcotics list is also defined as substance abuse. When a maritime employee uses a

prescription drug that is marked with a warning label, the captain must immediately be notified by the employee for an assessment of his/her safety function.

When you represent Hurtigruten Group outside of ordinary service or ordinary working hours, for example in connection with promotion/study trips for tour operators, trade fairs, courses etc., you are expected to conduct yourself in a way that does not harm the company's reputation. Employees may drink alcohol in moderation but must not be visibly intoxicated. Employees are expected to be able to determine what constitutes moderation and how to avoid being visibly intoxicated.

Read more about the company's substance abuse policy in in PY-0037 in our safety and quality management system.

#### **Examples of situations:**

- You suspect that a colleague is using intoxicating substances while at work. What do you do?
- You find something that you believe to be equipment for smoking hashish in an employee area. What do you do?
- A colleague often becomes extremely intoxicated at work-related social get-togethers. What do you do?
- A colleague manages to avoid the unannounced substance test on board. What do you do?

**If you are in doubt about whether you or others have problems relating to substance abuse, consider the following:**

- Are you unsure whether you or another person can resist temptations?
- Does the substance abuse negatively affect working relationships?
- Does the substance abuse negatively affect safety?

If you answer 'yes' to one or more of the above questions, you should reflect on your own behaviour and possibly have a talk with your superior.

## **2.12 IT**

### **Background**

Information security is vital for Hurtigruten's business - we rely on an IT environment that is both accessible and secure. Therefore, we have implemented a number of technical solutions that protects our systems and networks from hackers, scammers and viruses. However, these arrangements by themselves cannot guarantee a fully waterproof and adequate protection: you as a user play an important role in fostering IT security. You must therefore be aware of the hazards associated with the IT world and how to reduce the risk of destroying information and make the risk of misappropriation as small as possible.

### **Objectives**

To ensure that the IT systems of the company are used correctly, securely and responsibly. The intent of publishing an IT Code of Conduct is not to impose restrictions on Hurtigruten's employees, business partners or contractors but to protect its information, assets and IT resources whilst reflecting Hurtigruten's established culture of openness, trust and integrity.

**Applies for**

Anyone who uses the IT systems of Hurtigruten: all employees, substitutes, suppliers, consultants and other persons working for any of the companies belonging to the corporation. As with all other policies and procedures of the corporation, the leaders have the responsibility to ensure that users act in accordance with these principles

**1. Acceptable use**

Devices issued by Hurtigruten such as computers/smartphones, portable storage devices or any network (Wi-Fi/internet connection) operated and/or provided by Hurtigruten, must not be:

- used to view, create, download or distribute inappropriate content/material. “Inappropriate content/material” includes (but is not limited to) pornography, illegal/criminal activities, racial/religious slur. The definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law
- lent out to or operated by non-Hurtigruten users (e.g. family members, friends etc.)
- used to distribute or create messages or material that is damaging to Hurtigruten’s image and reputation, or puts Hurtigruten at risk/liability
- used to publish or share any copyrighted software, media or materials owned by a third-party, unless explicit permission is given by said party.
- used to download illegal copies of movies, music, games, software or other copyrighted materials through filesharing services or other technologies
- left unattended, at any time, in unprotected areas
- installed with software by anyone other than IT (applicable for computers, not smartphones)

Company IT and network resources — including but not limited to computers, smartphones and internet connections — are provided for legitimate business use. The company therefore reserves the right to monitor use of the internet, to examine systems and review the data stored in those systems. Any such examinations or monitoring will only be carried out by authorized staff.

Users must only use the computers, logon accounts or data for which they have authorization and not make efforts to gain access systems or information for which they do not have authorization.

If an individual is found to be in violation of the IT Code of Conduct, Hurtigruten can and will take disciplinary action up to and including suspension or termination of employment.

**2. Theft/loss of devices**

Theft or loss of any electronic device used to access and/or store company resources, such as laptops, smartphones/tablets or removable storage must immediately be reported to Service Desk at <https://wedoit.hurtigruten.com> or +47 913 41 505.

Computers issued by Hurtigruten may be labeled with an asset tag for identification purposes. The asset tag must not be removed or otherwise damaged – if the asset tag is indeed damaged or otherwise changed to the point where the tag is no longer identifiable, please report this to the Service Desk immediately using the contact information listed above.

If a lost mobile device is equipped with a remote management solution (such as “FindMyiPhone”), use the solution to deactivate the device as soon as possible – contact the Service Desk if you require assistance.

### **3. Passwords**

Passwords used to access any solution (computer logon, e-mail etc.) needs to meet the at any time applicable policy that is enforced by password system.

To create a strong password that’s also easy to remember, consider the following guidelines:

Use whole sentences to make it easier to remember and write long passwords  
Join words that don’t normally appear together (e.g. “banana” and “door”)

Refrain from:

Using easily identifiable personal data or phrases such as combinations of name and birth date or “standard” password phrases (e.g. “Password1234” or “sommer2019”)  
Writing down passwords on paper and keeping them in plain sight  
Sharing your passwords with anyone  
Using the same password across services (e.g. Gmail and your Hurtigruten user account)

### **4. Data protection**

OneDrive for Business is Hurtigruten’s corporate cloud storage solution, and content stored within it is protected by backup solutions and security protocols according to company policies. Whilst basic support for other cloud storage solutions is provided for interaction with external partners/vendors (e.g. deployment of Dropbox software), Hurtigruten does not take responsibility for content stored/shared through those solutions, nor is the content backed up or protected in case of accidental deletion or loss.

Content stored locally on company computers, smartphones/tablets or other devices is not backed up and cannot be recovered in case of deletion or loss/theft of said devices. Use approved storage solutions, such as network folders or OneDrive for Business, to store data or content.

Storing business and/or confidential data on personal equipment (e.g. home computer) is not permitted, nor is using personal equipment to access Hurtigruten internal networks, neither remotely nor internally.

Storing personal data (e.g. family photos, personal backups etc.) on Hurtigruten storage solutions is not permitted.

Data transmitted or created on company systems is deemed to be the property of the company and is subject to monitoring. Hurtigruten proprietary information stored on electronic and computing devices whether owned or leased by Hurtigruten, the employee, or a third party, remains the sole property of Hurtigruten.

Removable devices (USB stick/drive/DVD or similar) should only be used to store corporate data in exceptional cases. If used, the user must ensure that steps are taken to protect the device from theft

or loss. If corporate data is temporarily stored on a removable device for transfer (i.e. to customer or vendor), ensure that said data is deleted once the transfer is completed.

## **5. E-mail/social media**

E-mails to external contacts are transmitted unencrypted over the internet and are susceptible to interception or eavesdropping. Furthermore, once an e-mail is sent you are no longer in control of contents or re-distribution of these. As such, keep in mind the following:

Do not write anything in an e-mail that you wouldn't write on a postcard

Attachments containing confidential or business internal information to be sent by e-mail or shared through OneDrive for Business to external parties, must be encrypted and password-protected using 7-Zip software included on all HRG computers (link to KB article)

Please refrain from sending large attachments via e-mail. If you need to share large amounts of data, use OneDrive for Business.

As an employee in Hurtigruten, you have a responsibility to maintain the company's reputation and image. As such, ensure that language and tone is kept professional, courteous and appropriate when communicating through e-mail.

With the advent of social media and internet transparency, please also keep in mind that your social media profiles can easily be linked to your employer, even when acting as a private person. The principles outlined in paragraph 2, "Acceptable use", also applies both for social media and e-mail.

## **6. Remote access**

Remote access to Hurtigruten IT systems is achieved using a VPN solution. These solutions require two-factor authentication – one factor being your logon name and password, the other a one time-password either sent to your cell phone or provided by a token.

## **7. Security**

As an employee in Hurtigruten, you also have a responsibility to assist in keeping IT systems, information and data secure. Whilst Hurtigruten IT employs several technologies to ensure security and data integrity of all systems, please keep in mind the following when using Hurtigruten IT systems:

Computer viruses and malware often propagate via e-mail – please do not open attachments from unknown sources. If you are unsure about the validity of data attached to an e-mail or have opened one, please contact Service Desk immediately

If prompted to install anything when visiting a website, please deny the request. Should you happen to do so anyways, please report the incident to the Service Desk

Hurtigruten IT staff will never ask for your password or any other authentication details. If you receive any request to give out your password(s), please deny the request and report the incident to Service Desk

## **8. Clean desk & Clear screen**

Hurtigruten applies a clean desk and clear screen policy. This means that users have the responsibility to ensure that no confidential information is viewable on either desks or on screens, for others than the user or by other users with provisioned access rights to the information.

Screens shall be locked if left unattended. Confidential information on desks shall be securely locked away when not used. The same applies for information used outside the workplace.

## **9. Travel**

When working with the computer in public areas, such as airports, planes, trains or hotel lobbies, care must be taken to ensure that others cannot view the information on the screen. Preferably a privacy filter, which limits the angle from which the screen can be viewed, should be used. Please contact Service Desk to order a privacy filter if you need to do a lot of work in public areas.

Travel to [high risk countries](#) e.g. China or Russia (what is considered a high-risk country may vary from time to time) requires special consideration and preparation when it comes to IT equipment that you bring with you. Please contact the Service Desk if you are planning a trip to what could be considered a high-risk country.