



Hi3G Code of Conduct 2022

At Hi3G Denmark Aps (hereinafter “Hi3G”), we want to be an attractive partner - for our customers, owners, suppliers, and the community we are part of. We are committed to adhere to the principles of responsible behavior and to protect Hi3G and Hi3G's reputation.

Hi3G's Code of Conduct constitutes guiding principles and ethical standards that employees at Hi3G must always adhere to. Hi3G therefore requires that our employees have read and understood the principles and we also expect that they are complied with in the daily operations, and that all employees immediately report on matters where behaviors deviate from the Hi3G Code of Conduct and non-compliance is detected.

1.0 How to avoid conflicts of interest

1.1 Conflicts of interest

Conflict of interest may arise when our personal interest conflict with Hi3G's interests. At Hi3G we make sure that all our decisions are taken independently of private interests or divided loyalties. A conflict of interest exists when financial interests, or other personal incentives, influence or appear to influence an employee's professional performance. It may also be the case when employees give preferential treatment to personal contacts, such as family members, personal friends, or business associates. We ensure that we actively avoid or mitigate situations that create potential or perceived conflict of interest with our business activities.

If we do not act in the interest of Hi3G, it may compromise our integrity. This could adversely affect Hi3G's reputation. All decisions made on behalf of Hi3G must therefore be made in an objective and transparent manner. Openness and transparency are crucial in the event of a conflict of interest, so there can be no doubt as to whether we act impartially.

2.0 How to protect our assets, data and information

2.1 Privacy and data ethics

Our customers and everyone else must have confidence that we protect all forms of personal information as they trust us with their private and sensitive information.

Living up to this trust by respecting and safeguarding our customer's privacy is vital to us as we store personal information about all our customers and employees. We have an obligation to protect them, maintain confidentiality and use information only for legitimate business purposes to complete our work.

We are committed to acting in open and transparent to our customers and employees about how we use their data. Personal information is considered confidential, and we have internal procedures and processes that we must follow. We ensure that personal data is not processed without adequate control and security, and that safety measures are in place and implemented.

2.2 Confidentiality

At Hi3G we understand the importance of processing information with particular care and that data constitutes an asset that we are required to safeguard and process in accordance with applicable guidelines.

We regularly process confidential information about Hi3G, customers or partners. We ensure integrity of our assets and take great care to maintain confidentiality in accordance with internal procedures and processes.



2.3 Safety and protection of company assets

We strive for security to be an integral part of the way we run and develop our business. The company's assets include everything that Hi3G owns or uses to conduct business and provide services, including equipment, facilities, systems, and information. The protection of our assets is key to us.

Security threats can affect our assets and potentially have significant financial, operational, and reputational consequences. All employees at Hi3G hold a responsibility to ensure that we do not compromise on safety.

We work risk-based and set requirements for safety and protection levels. This applies to all assets, including persons, information, and data, IT and development of solutions as well as facilities, where we ensure that we comply with regulatory requirements. Cyber security has become increasingly important in recent years, and all employees must follow our guidelines for security and IT, act responsibly and protect Hi3G's network against unauthorized use and access. Extra care should be taken when working from a distance.

2.4 Insider information

At Hi3G, we take good care to protect confidential business information, especially when its disclosure of any non-public information could influence the share price or value of a company if it were known to the public. These can be financial results that have not yet been announced, potential mergers and acquisitions, changes in top management and significant legal issues.

3.0 How to run our business

3.1 Anti-corruption and -bribery

We do not tolerate corruption or bribery. Any offer of, provision of or receipt of wrongful services as part of your work at Hi3G is considered strictly forbidden and has serious consequences. It can be the use of a third party by extortion, arranging bribes to obtain a business advantage by simplifying or speeding up administrative procedures, sales processes and the like.

All Hi3G employees are required to report any possible incident immediately and to act in accordance with written procedures.

3.2 Gifts and hospitality (“Business Courtesies”)

We must avoid situations where we may be or perceived as being under the influence of indirect monetary contributions. This may be the case, when receiving gifts, entertainment offers, and travel, which can lead to potential conflicts of interest, or in the worst case be considered as a bribe and lead to questioning of our integrity and impartiality.

3.3 Fair competition

Fair and open competition is important to society and to serving our customers in the best manner. That is why we are subject to strict rules and antitrust laws that prohibits all anti-competitive agreements or practices, which has as their object the prevention, restriction, or distortion of competition. Infringements will have serious financial consequences for Hi3G and potentially damage Hi3G's reputation.

3.4 Supplier management

We expect our partners to meet Hi3G's standards and principles of supplier conduct, and to respect our ethical values.



The actions of our partners can potentially damage our reputation. Therefore, we conduct regular screening of our partners.

Our cooperation with suppliers is based on mutual trust. Failure to comply with applicable requirements may result in termination of our collaboration. Hi3G's employees are expected to report openly and without any delay, about any conduct that may be in non-compliance with our supplier guidelines.

3.5 Social media

Acting as a private person on social media, we expect employees to act with care and responsibility when posting online. We encourage employees to always re-think what they publish and how they communicate on blogs, tweets, wikis, or other forms of social media.

3.6 Press

Senior Management Team and selected "Heads off's act as spokespersons for 3.

In case, journalists or other external parties unexpectedly calls or wants to ask questions, these are handled by Corporate Affairs team being responsible for all press contact. In this way, we avoid journalists receiving conflicting information. Hi3G has a press number, which is always answered: 31200202.

Speaking up and expressing concerns

We expect our employees and everyone who represents us to act in accordance with applicable regulations as well as the guidelines for good code of conduct.

We also have separate guidelines for suppliers. Using various procedures, we ensure that our business partners meet our requirements.

For more information, our Supplier Code of Conduct can be accessed [here](#).

We are all responsible for complying with our ethical guidelines as well as preventing and reporting on any violations in a timely manner.

We always encourage to act quickly if employees or partners suspects or witness any non-compliance and to report to managers or HR.

All managers in Hi3G have a duty to ensure that reporting channels are known by the employees. In cases where an employee cannot report a concern to manager or HR, Hi3G has a Whistleblower hotline.

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