

## CODE OF CONDUCT

HNP has customers and suppliers in a number of countries. This means that our responsibility extends worldwide. Hence the need for a Code of Conduct that governs our relationships internally with each other as well as our relationships externally with customers and suppliers. Our Code of Conduct shall always be communicated as a natural part of our work.

### **Principles of Doing Business**

A basic requirement is that we act within the framework of all laws and international conventions both internally and externally. Such laws and conventions shall always be respected and abided by.

All cooperation with customers and suppliers is subject to the precondition of accommodating all requirements to our finished products. Agreements and arrangements related to the nature and scope of our assignments shall always be clear. Customers and other stakeholders shall always view HNP as a reliable and fair enterprise that always lives up to its commitments.

Any and all information regarding our business operations shall be treated as confidential. Corrupt business practises and other unfair, anti-competitive actions will not be accepted.

### **Corporate Social Responsibility and Human Rights**

Commitments to employees in pursuance of national laws and social protection agreements shall be respected and complied with. Employees shall be treated with respect and dignity.

There may be no punishments or threats of punishments.

No discrimination of employees is accepted. Equal opportunities and equal treatment shall always apply regardless of race, sex, nationality, age, marital status, sexual orientation, membership in trade unions, political convictions or religion.

Child or forced labour is not accepted.

Working hours shall comply with national laws and agreements.

Wages and other remuneration shall, as a minimum, comply with national laws, applicable agreements and generally recognised industry standards.

Employees' right to organise and bargain collectively shall be respected.

Occupational safety and health shall comply with the applicable acts and regulations relating to occupational safety. Machinery and other equipment shall be safe to use so as to minimise the risk of illness and injury.

### **Environment**

HNP is actively working to continually reduce the environmental impact of its operations. Our most substantial environmental impact is exerted by transport, so we actively work to put any incoming goods on rails and coordinate outgoing shipments in connection with deliveries.

As a steel supplier, we realise that steel production has a major indirect environmental impact. We appreciate the industry's ambition to make its steel production fossil-free, and we monitor technological developments in order to be able to offer our customers steel with a lower environmental impact once such steel is available on the market.

National and international environmental laws and regulations shall be complied with. The environmental work within the operations shall be subject to continual improvements.

Waste shall, to the extent possible, be sorted at source and recycled. Hazardous substances and hazardous waste shall be handled in an eco-friendly manner.

### **Application**

HNP is responsible for ensuring that the Code of Conduct is communicated both internally and externally. Managers are responsible for the application of this Code of Conduct along with national laws and regulations within their respective areas.

### **Follow-Up**

HNP follows up on the approach to our Code of Conduct internally as well as externally.

HNP reserves the right to conduct unannounced inspections of suppliers and other interested parties. Inspections may also be carried out by third parties.

Repeated and serious accidents will lead to corrective measures and possibly to the termination of our business dealings.