

Infortar Guide for Responsible Business Conduct

Introduction

AS Infortar is an investment company which, together with its subsidiaries and affiliates, forms a group (hereinafter 'Infortar'). Its main investments are in shipping, real estate development, energy, construction, extraction of mineral resources, and printing.

Investment firms play an important role in society, creating jobs and managing financial assets in a way that promotes economic growth and prosperity. The commercial activity of Infortar directly and indirectly affects the markets and communities in which it operates.

The long-term goal of Infortar is a good reputation and profitable commercial activity based on ethics and responsibility. Infortar follows the laws of the country where the company is located.

For Infortar, responsible business conduct means creating and adhering to long-term economic, ethical, social, and environmental values. In its activity, Infortar uses a broad business model and focuses on transparent and legal commercial activity, making people feel valued, equal treatment, community well-being, responsible partnerships, and the surrounding environment. The core values of Infortar are commitment, cooperation, transparency, and the creation of synergies between the different subsidiaries and affiliates of the group.

Purpose

The purpose of this document is to highlight the principles of responsible business conduct to inform employees and partners and to ensure the sustainability of Infortar.

Scope

The principles of responsible business conduct apply to the commercial activity and operations of Infortar worldwide. All Infortar employees are obliged to follow this guide. We also expect our partners and suppliers to follow these principles.

Responsible business conduct

Infortar believes that sustainable development is an essential and integral part of creating value for customers, employees, stakeholders, and society as a whole. Infortar is convinced that companies that act on principles of sustainability and responsibility are more successful in the long run. Infortar aims to create long-term financial, ethical, social, and environmental value. Infortar addresses aspects of responsibility that are important and meaningful to Infortar as an investment company and to the markets in which Infortar operates.

Infortar

- is guided in all its activities by the principles of sustainability and responsibility, being accountable for its actions and for implementing its values, and striving for openness and transparency;
- influences through dialogue, and develops solutions and offers that empower the customers and the community of Infortar and the group itself to make beneficial contributions to a sustainable future;
- manages risks, including environmental, social, and governance risks;
- contributes to the development of society and future generations.

Managing responsible business conduct

Infortar integrates issues of sustainability and responsibility into its daily operations by applying a broad business model. This includes identifying and implementing opportunities to achieve a beneficial impact, as well as avoiding or reducing the adverse impact resulting from Infortar's activities, services, or transactions. By guiding and motivating employees and customers, Infortar aims to raise their awareness and to promote knowledge and innovation related to responsible business conduct in all functions of the company. Infortar has identified the following priorities in managing responsible business conduct:

People

Infortar is a reliable employer. A reputable group that motivates people to promote the values of Infortar and adapt the organisation for the future. Infortar ensures a safe and healthy working environment for its employees and, where necessary, appropriate training. The aim is to prevent accidents at work and to reduce time away from work due to accidents/injuries.

Infortar gives everyone the opportunity for professional and personal development. Infortar makes every employee feel valued and appreciated, involved and engaged, and that their knowledge and skills have been utilised to their full potential.

We treat everyone fairly and equally, without discrimination. We value employees regardless of their gender, race, religion, or social background. Infortar does not use child, forced, or compulsory labour in its companies.

Our people care about each other and interact with each other and with people outside the group in a kind and courteous way.

The social responsibility of the company

We value people, our community, and the environment around us. We involve future generations and educate the community about the activities of the group through campaigns and public appearances. We engage with public organisations and authorities to contribute to community development. Through active partnerships, we support young people, their development and sporting opportunities, and entrepreneurship.

Professionalism and honesty

We do our work professionally, diligently, and dutifully, while following all applicable laws, regulations, and standards. We always try our best and keep our promises.

Investments

We ensure that investment decisions are made responsibly and investments are transparent. We follow environmental responsibility, as well as social responsibility and governance aspects when making investment decisions.

Integrity of documents and information

Each Infortar employee is personally responsible for the information they provide. All Infortar employees are required to ensure that the information they provide, both inside and outside the company, including information documented through IT systems, is reliable, truthful, and complete for customers.

The same principle applies to documented labour, financial, legal, and tax information provided to national and supervisory authorities.

Confidentiality and the protection of personal data

At Infortar, we value confidentiality and the protection of personal data. We follow the general data protection principles, the rules under the GDPR, and the principles on the use of personal data at Infortar group.

We treat any information obtained in the course of providing our services as strictly confidential and will keep all data strictly secret. All of our employees take the protection of information in their possession seriously, while ensuring that employees under their authority also keep the information confidential. It is the responsibility of everyone to ensure that confidential information is protected by appropriate safeguards that allow access only to authorised persons.

Cybersecurity and crime prevention

We ensure cyber security, including data security. We work to prevent money laundering, fraud, and the financing of criminal activities.

Fighting corruption

Infortar has zero tolerance for all forms of corruption, bribery, and taking bribes. Infortar has developed a separate Anti-Corruption Guide.

Environmental impact

The aim is to reduce Infortar's direct impact on the environment by using more energy-efficient solutions and reducing waste through recycling. Waste (including hazardous waste) is disposed of in accordance with the Waste Act and through companies with the relevant permits. Infortar pays attention to training its employees in environmental safety. Infortar encourages employee participation in volunteer activities such as planting forests, etc.

We limit Infortar's indirect environmental impact related to services provided by our subsidiaries and cooperation with suppliers to reduce the harmful and increase the beneficial impact.

Consumer interests

Infortar ensures that the goods and services it provides comply with the requirements agreed upon or prescribed by law to ensure the health and safety of the consumer and, where appropriate, are marked with health risk warning labels and product safety and information labels. Infortar avoids providing misleading information to consumers and handles and resolves consumer complaints fairly and as quickly as possible. Infortar respects the requirement to protect the personal data and private life of the consumer.

Intellectual protection

Infortar complies with the requirements of the protection of intellectual property.

Competition

Infortar does not enter into anti-competitive agreements between market participants. Infortar operates in compliance with competition laws.

Management

Decisions on the strategy and sustainability aspects of Infortar are made by the Supervisory Board of Infortar. The Managing Director together with the members of the Management Board of the group (hereinafter 'the Management') decide on the principles of sustainable business conduct and their implementation in line with the strategy of Infortar.

International agreements

In all markets, Infortar operates in accordance with the law and the principles and rules established within the organisation and adheres to high ethical values, internationally recognised human rights standards, and working practices.