



Code of Conduct

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Introduction

This is the code of conduct for the H+H Group. The code of conduct is the foundation of H+H's compliance work and sets the tone with regard to our business ethics and integrity. On top of the code of conduct there are a number of building blocks in the form of different policies dealing in more detail with specific topics mentioned in the code of conduct such as health & safety, fair competition, anti-corruption and personal data protection.

Every employee of H+H shall know and adhere to our code of conduct. Every manager shall serve as a role model and inform and encourage colleagues to discuss openly, how we follow the principles set forth in the code of conduct.

If you are in doubt whether an action constitutes a violation of the code of conduct or any group policy, feel free to seek advice and guidance from your line manager, your compliance officer, your managing director, Group HR or Group Compliance.

H+H will not tolerate any breach of our code of conduct. It is therefore very important that you speak up immediately if you become aware of or suspect any violations of our code of conduct, so we can take action in due time. This includes, for example, breaches of health & safety procedures, bribery, corruption, fraud or anti-competitive arrangements. H+H wants to promote an open dialogue, and we therefore encourage you to report your concerns to the relevant H+H manager, to Group HR or, if you are a supplier, customer or other stakeholder of H+H, to your point of contact within the H+H Group. However, if circumstances are such that you prefer to report in confidence, you may also report your concerns – anonymously or non-anonymously – through our online whistleblower system.

All reports of suspected violations of the code of conduct or any specific H+H policy made in good faith shall be fully investigated, and retaliation against anyone who reports in good faith shall not be tolerated.

Thank you for complying with our code of conduct!



Michael T Andersen
CEO of H+H International A/S



Kent Arentoft
Chairman of H+H International A/S

Employees

Workplace health & safety

Safety first! Our most valued asset and therefore our primary responsibility is our employees. Every employee shall be entitled to a safe and secure workplace. The health and safety culture in H+H is driven by our group health and safety policy. Management is committed to continuously following up on all lost-time accidents and making health and safety aspects visible in the H+H organisation. H+H believes in Zero Harm and so strives to continuously raise safety awareness for all and commits to imbedding health and safety into H+H's values and strategy.

Basic employee rights

H+H strongly supports the human rights and employee rights as set out in the UN Universal Declaration of Human Rights and the International Labour Organization's eight fundamental conventions.

Therefore, H+H:

- Respects freedom of association and the right to collective bargaining
- Supports the principle of equal opportunity
- Does not accept the use of forced or compulsory labour or the use of child labour



Employees

Equality, non-discrimination and respect for privacy

H+H shall maintain non-discriminatory behaviour and treat every employee with proper respect regardless of race, gender or gender identity, age, national origin or citizenship, religion, political conviction, sexual orientation, marital status, disability or genetic information or any other legally protected categories. We will not tolerate any kind of harassment or abuse of employees.

We respect the privacy of our employees and retain only the relevant personal data in compliance with GDPR and/or other applicable personal data protection legislation. Everyone should bear in mind that, except for any limitation under local law, all electronic information on H+H's IT infrastructure belongs to H+H and may be logged in order to carry out the legitimate business interests of H+H.

Confidentiality and insider trading

Disclosure of confidential information may harm our competitive position, and every employee is obliged to protect our confidential information and to avoid discussing such information, where the information can be overheard or read by third parties. Likewise, no employee may utilise confidential information from competitors.

H+H International A/S is a publicly traded company and every employee is responsible for keeping inside information about H+H confidential in accordance with the securities legislation applicable at any given time. Trading in shares and other securities of H+H can only be carried out in accordance with our internal rules for trading in H+H shares and other securities and handling of inside information.



Employees

Conflicts of interest

Business activities shall be conducted in the best interest of H+H. All employees are responsible for avoiding conflicts of interest and shall therefore not without the written consent of HR or for the smaller H+H entities without a local HR then the managing director, and for the managing director written consent of the H+H Group CEO:

- Do business on H+H's behalf with close relatives or close friends
- Invest directly in Autoclaved Aerated Concrete (AAC) and/or Calcium Silicate Unit (CSU) producers competing with H+H
- Work or take employment outside of H+H, which is in competition with H+H

Fraud

H+H has an anti-fraud policy to ensure establishment of proper controls to prevent fraud as well as to describe procedures on how to investigate reports on suspicion of fraud. All employees are obliged to report any suspicion of fraud or fraudulent behaviour in H+H to the relevant managing director or Group HR directly or, if necessary, via our whistleblower system that can be accessed from all H+H web-sites.



Business ethics

Fair and lawful competition

H+H wants to compete on equal and fair terms – no deal is good enough to be achieved by unethical or illegal means! Unlawful and anti-competitive arrangements may not only damage our business and reputation, but also result in severe penalties for H+H and the employees responsible as well as imprisonment for individuals.

All employees are therefore under an obligation to comply with applicable competition law and adhere to the H+H competition compliance policy:

- Do not participate in any price fixing or market sharing
- Do not share any market information regarding e.g. prices, volumes or cost structure other than as permitted by law through trade associations and government bodies



Business ethics

Bribery

H+H condemns corruption and bribery and it is therefore not acceptable for any employee to:

- Promise or offer a bribe in any form to a public official
- Solicit, accept, promise or offer a bribe or kickback in any business relationships

Donations

Political engagement with politicians and governments may serve to promote H+H's legitimate interests. However, this does not entail that political contributions are acceptable – and in some countries they may even be illegal. H+H and its employees shall not make any political contributions on behalf of H+H, unless prior written approval has been obtained from the H+H Group CEO.

Local or national non-political sponsorships or donations may serve to promote H+H's legitimate interests, but they shall;

- Always be within the specific limits approved by the managing director
- Promote the interests of H+H and its employees and be disclosed openly within H+H
- Never be directly or indirectly tied to the execution of a business transaction or government action



Business ethics

Entertainment and gifts

Business entertainment and gifts may be a completely legitimate and customary business practice. However, there are circumstances where the value exceeds reasonable limits or business entertainment and gifts are used to obtain undue business advantages.

H+H expects all employees to use good judgment. Discuss with your line manager if you are uncertain whether the business entertainment or gift you are offering or being offered is appropriate.

Money laundering

Watch out for unusual payments! Money laundering is disguising illegal sources of money (“dirty money”) so that the money looks like it came from legal sources (“clean money” or “white money”), e.g. by using money earned from criminal activities to buy legal products such as e.g. H+H products. Money laundering is a serious crime and no employee shall accept any payment which is likely to stem from criminal activities.

Human rights

We extend our strong support for human rights to safeguard the basic employee rights (see the Employee section above) to also encompass a general obligation that our suppliers commit to respect the protection of internationally proclaimed human rights and urge our employees to report any human rights abuse within H+H or our suppliers.



Environment and climate

Environment and climate

Doing business in a sustainable way is an integral part of all of H+H's activities. Our products are eco-friendly wall building materials and provide comfortable, safe and healthy buildings due to excellent indoor climate, thermal insulation, fire resistance and acoustics. H+H's know-how, experience and research have enabled a robust manufacturing process and, most importantly, products with strong properties for sustainable buildings.

To help ensure that sustainability is always considered when H+H does business, we commit to:

- Complying with all environmental legislation and ensure that our suppliers commit to do the same
- Improving the utilisation of resources, energy efficiency, emissions and waste minimisation
- Innovation within our products and processes which among other objectives shall be environmentally driven

