

HPT Code of Conduct

August 2026

1. Purpose and Principles

This Code of Conduct sets out the fundamental principles and minimum requirements that **H. P. Therkelsen A/S ("HPT")** adheres to in its business operations and expects to be observed throughout its transport and supply chain.

The purpose of this Code of Conduct is to ensure that HPT's activities are carried out in a responsible, lawful, and ethical manner, with particular emphasis on:

- Ensuring fair and responsible conditions within the transport industry
- Respecting human rights and workers' rights
- Conducting business in an ethical, lawful, and transparent manner
- Supporting customers' requirements regarding CSR, ESG, and compliance

2. Compliance with Laws and Regulations

HPT is always committed to complying with all relevant and applicable laws and regulations in the jurisdictions in which it operates, including but not limited to:

- Applicable national and international legislation
- EU regulations concerning transport, occupational health and safety, and driving and rest periods
- Rules relating to taxation, social contributions, residence and work permits

HPT's conduct and business practices are furthermore based on and support the following international standards:

- The United Nations Global Compact
- The United Nations Guiding Principles on Business and Human Rights
- The core conventions of the International Labour Organization (ILO)

3. Human Rights

HPT respects internationally recognized human rights and does not accept any form of direct or indirect involvement in human rights violations.

The following are not tolerated:

- Forced labour or debt bondage
- Human trafficking
- Child labour
- Retention of passports, identity documents, or other personal documents

All work performed in connection with HPT's activities must be voluntary and based on lawful, clear, and transparent employment relationships.

4. Working Conditions

HPT works to ensure fair and lawful working conditions throughout the value chain. This includes, among other things, requirements for:

- Written employment contracts
- Correct and timely payment of wages
- Compliance with applicable working time regulations
- Respect for employees' right to rest, leisure time, and holidays

5. Diversity, Inclusion, and Equal Opportunity

At HPT, we treat everyone with respect and dignity. We value diverse perspectives and ensure equal opportunities for employment, development, and career advancement.

We do not accept discrimination, harassment, or inappropriate conduct. All employees are expected to contribute to an inclusive workplace where diversity is regarded as a strength and where people are evaluated based on their competencies, commitment, and conduct.

Where applicable legislation exists in this area, such rules shall always be complied with.

6. Driving and Rest Periods

Transport services carried out on behalf of HPT must be planned and performed in full compliance with applicable rules on driving and rest periods.

It must furthermore be ensured that:

- Drivers have access to lawful, decent, and safe rest and accommodation facilities

7. Health and Safety

HPT places great emphasis on maintaining a high level of safety and occupational health and works systematically to ensure:

- Safe and sound working conditions
- The use of roadworthy and legally compliant vehicles
- Relevant instruction and training for employees
- Access to necessary safety equipment free of charge

8. Environment and Climate

HPT continuously works to reduce the environmental impact of its activities, including through:

- Reducing the environmental impact of transport operations
- Minimizing unnecessary fuel consumption and emissions
- Compliance with applicable environmental legislation

9. Business Ethics

HPT has zero tolerance for any form of unethical or unlawful business conduct, including:

- Corruption
- Bribery
- Fraud and other unethical business practices

HPT strives to conduct business responsibly, professionally, and transparently in all relationships.

10. Data Protection and Confidentiality

HPT processes personal data and confidential business information in accordance with applicable data protection legislation, including Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), and implements appropriate technical and organizational measures to protect such information.

11. Whistleblowing and Reporting

HPT supports a culture characterized by openness and accountability.

Employees, business partners, and other partners must be able to report serious misconduct or concerns in good faith without risk of retaliation or adverse consequences.

12. Supplier Responsibility and Continuous Improvement

HPT imposes corresponding requirements, as set out in this Code of Conduct, on hauliers, subcontractors, suppliers, and business partners.

HPT works in dialogue with relevant parties to achieve continuous improvements in:

- Working conditions
- Safety
- Responsible and legally compliant transport operations