

Code of Conduct for HITSA

November 2021

Purpose

HITSA aims to provide financial value and appealing urban spaces for its owners, employees and customers and to make a positive difference by means of design, expertise, social responsibility and sustainability.

In order to achieve these objectives, it's necessary to take an interest in the world in which our business operates.

This Code of Conduct formulates and establishes an ethical framework for all of HITSA's activities.

The purpose of HITSA's Code of Conduct is to communicate to everyone involved with HITSA – employees, customers, partners, suppliers, authorities and others – what HITSA stands for in terms of conduct and how we aim to play our part in the world.

Values

HITSA is founded on three fundamental values – honesty, responsibility and customer focus.

These values indicate first and foremost how we want to be perceived in a business context.

The values of honesty and responsibility in particular incorporate an integral ethical obligation. HITSA's concept of honesty is that we want to be trustworthy, and we want to ensure consistency between what we say outwardly and who we are internally. Responsibility to us means that we do not push responsibility for the impact of our actions onto someone else – and if we have a negative impact, that is our problem.

This Code of Conduct explains how we aim to apply our values in relation to a number of specific topics.

Laws and regulations

All activities at HITSA must comply with applicable laws and regulations.

HITSA's own activities are based in Denmark, Sweden and Latvia. The company may conduct customer activities in other countries. HITSA complies with national and international legislation wherever we operate. If our customers or partners have stricter regulations than applicable legislation, we respect these.

In certain instances HITSA wishes to take greater responsibility than required by laws and regulations. This is the case for social responsibility and climate and environmental responsibility, for example.

Ethical framework

Working environment

HITSA wishes to protect its employees against illness and injury resulting from their duties at HITSA. Therefore HITSA complies with national working environment legislation and works continuously in cooperation with its employees to ensure the best possible working environment.

Employee rights

HITSA complies with the principles of the core conventions of the International Labour Organisation (ILO) and the ILO Declaration on Fundamental Principles and Rights at Work.

HITSA does not condone child labour and does not work with suppliers or other parties who employ child labour. HITSA complies with national legislation with regard to employment of minors in after-school jobs.

HITSA does not condone forced labour and does not work with suppliers or other parties who use coercion, pressure, threats or similar on employees. All employment relating to HITSA or HITSA's stakeholders must be entered into on a voluntary basis.

HITSA does not condone discrimination in work-related or other contexts owing to a person's gender, skin colour, age, political opinion, sexual orientation or ethnic origin.

HITSA has signed up to and complies with Danish Industry's Industrial Agreement. HITSA respects the right of employees to collective bargaining and their freedom to opt in or out of membership of a union. Employees' terms of employment are independent of any union membership.

Sustainability

HITSA wishes to conduct its activities in a manner that does not cause harm to the environment or the climate. As a result we regularly monitor our environmental and climate impact and use this knowledge as far as possible to modify our actions for the good of the environment and climate.

As a framework for our environmental and climate efforts, HITSA has prepared a sustainability strategy, which is available at hitsa.dk.

Confidentiality

When we come into possession of information at HITSA that may be deemed to be sensitive, personal or confidential, we handle such information with the necessary care and confidentiality. We comply with GDPR requirements and related legislation and also apply common sense. This applies in all respects, e.g. in day-to-day operations between colleagues, in HR and in business contexts.

Competition

HITSA is happy to compete with our colleagues in the industry. HITSA does not enter into activities intended to restrict or distort competition on the market, e.g. exchange of price information with competitors.

Corruption

HITSA does not condone any form of unethical inducements to secure orders or permits, including contributions, bribes, corruption or threats.

Social responsibility

HITSA regards every individual as independent and unique whatever their group affiliation in terms of gender, skin colour, age, political opinion, sexual orientation or ethnic origin. HITSA never wishes to act in a prejudiced manner towards anyone.

HITSA has a strategy for social responsibility and inclusion of individuals on the fringes of the labour market. In collaboration with job centres and our owner, Den Sociale Kapitalfond Invest, HITSA gives vulnerable individuals a chance to enter the labour market. We produce audited social accounts every year. Our strategy for social responsibility is described on hitsa.dk.

Financial crime

HITSA does not enter into activities for the purposes of money laundering, fraud, tax evasion or other financial crimes.

Consequences

If HITSA ascertains that a manager, employee, partner or supplier is acting in violation of this Code of Conduct, HITSA will take the action that we deem necessary in the case in question. This could be discussion, reprimand, dismissal, termination of collaboration, police report or other, dependent on the circumstances.

Process

This Code of Conduct has been approved by HITSA's board of directors in November 2021.

Work on the Code of Conduct – review, documentation, supplier requirements, etc. – will be ongoing.