



HÖEGH AUTOLINERS

Supplier Code of Conduct



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HÖEGH AUTOLINERS

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At Höegh Autoliners, we hold ourselves—and our employees—to the highest standards of professionalism, ethical behavior, and legal compliance.

We expect the same unwavering commitment from our suppliers. This Supplier Code of Conduct sets the foundation for the vital partnerships we build with those who do business with us. All suppliers, as well as any company seeking to engage with Höegh Autoliners, are required to fully adhere to the principles outlined herein.

Höegh Autoliners is firmly committed to these standards and expects its suppliers to actively adopt and uphold the same level of integrity and conduct. Furthermore, we expect our suppliers to ensure that these standards are reflected throughout their own supply chains.

By working together with shared values and mutual accountability, Höegh Autoliners and our suppliers can achieve more—together.

Andreas Enger
CEO



HÖEGH AUTOLINERS

Purpose and Scope

This Code sets out the core expectations Höegh Autoliner places on all suppliers, sub-suppliers, contractors, and business partners. It defines the ethical, legal, and sustainability standards that must guide all business activities conducted on our behalf. Suppliers are expected to operate responsibly, comply with all applicable laws, and promote these standards throughout their own supply chains. Moreover, all suppliers are expected to ensure their subcontractors are familiar with and comply with this Code.

This Code may be updated from time to time. The most recent version, as published on Höegh Autoliner's [<https://www.hoeghautoliner.com/resources>], shall apply and supersede all previous versions. Suppliers are expected to remain informed of updates and ensure ongoing compliance with the current version.

Our approach is grounded in internationally recognized frameworks, including the UN Global Compact, the Universal Declaration of Human Rights, the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, Organisation for Economic Co-operation and Development (OECD) and ISO standards on health, safety, and environmental management.

In cases where local laws differ from the standards in this Code, we expect suppliers to follow the more rigorous requirement. If conflicts arise between legal obligations and this Code, we encourage open dialogue to determine the most appropriate course of action in alignment with our shared values.

Work Environment

CHILD LABOUR

Höegh Autoliners Suppliers must have a zero tolerance for child labour.

The minimum age of all workers must meet or exceed local laws for employment age and must comply with International Labour Organization (ILO) regulations.

FORCED LABOUR AND HUMAN TRAFFICKING

Höegh Autoliners prohibits trafficking in persons and slavery. Höegh Autoliners contractors, subcontractors, vendors, suppliers, partners and others through whom Höegh Autoliners conducts business must not engage in any practice that constitutes trafficking in persons or slavery and shall have policies and processes in place to prevent trafficking, modern slavery and forced labour throughout its supply chain.

Höegh Autoliners has undertaken actions and is committed to maintaining and improving its systems and processes, in addition to eradicate human trafficking and slavery in its direct supply chain.

INCLUSIVE WORKPLACE

Höegh Autoliners Suppliers shall offer an inclusive workplace, which values and respects the diverse background, perspectives, ideas and identities of all individuals. Höegh Autoliners Suppliers shall ensure that all individuals have equal access to resources, opportunities, and advancement, regardless of gender, race, family situation, age, disability, sexual orientation, gender identity, ethnicity, culture, nationality, union membership or religion.

Höegh Autoliners Suppliers shall respect the dignity and human rights of all employees, including women's rights, and rights of minorities and indigenous peoples. In no event shall employees be subject to physical, sexual or verbal harassment.

Furthermore, no employee shall be held to corporal punishment, retaliation, or use of monetary penalties as an act of punishment. All Höegh Autoliners Suppliers and it shall treat its employees with respect and courtesy and shall not discriminate or harass other employees based on gender, race, family situation, age, disability, sexual orientation, gender identity, ethnicity, culture, nationality, union membership or religion or any other statute protected by law.

HOURS OF WORK

Höegh Autoliners Suppliers will ensure that its employees working hours per week, inclusive of overtime, comply with local laws governing regular work hours and overtime work hours.

WAGE AND BENEFITS

Höegh Autoliners Suppliers will pay their employees on a regular interval and in a timely manner, no less than the minimum compensation required by local laws inclusive of regular wages, overtime pay and benefits that are legally mandated.

FREEDOM OF ASSOCIATION

Höegh Autoliners Suppliers are expected to recognize and respect the right of employees to freedom of association and collective bargaining. Suppliers must ensure that security personnel respect human rights at all times, including refraining from the use of force to intimidate, interfere with, or restrict workers' rights to freedom of association.

Health and Safety

Höegh Autoliners suppliers shall identify, assess, and control its and its employees' exposure to occupational health and safety hazards, and comply with all relevant health and safety laws, rules and regulations. Höegh Autoliners suppliers will ensure that their employees have a safe and healthy work environment that meet all local laws and regulations. Suppliers are encouraged to document incidents, report them promptly, and conduct root cause analysis to help prevent recurrence.

All suppliers must provide their employees with required job-related safety equipment with instructions on its proper use. The supplier is responsible for ensuring that the equipment is appropriately maintained and replace non-compliant equipment. Suppliers shall ensure all workers receive safety training at the time of hiring and annually thereafter.

The suppliers shall identify and assess potential emergency situations relevant to the services provided and deploy adequate safety measures.

Supplier employees shall have the right to refuse unsafe work and to report unhealthy working conditions.

Environment

Höegh Autoliners gives the utmost respect for the environment and expects its suppliers to conduct their operations in the highest of environmental standards while at minimum complying with international, local and regional laws and regulations regulating environmental controls, emissions and sourcing of materials. Suppliers are expected to monitor and assess the environmental impact of their activities with the purpose identifying aspects which may be improved in order to reduce their environmental footprint.

We are committed to reducing CO₂ emissions across all aspects of our operations. We encourage our suppliers to set science-based climate targets and implement measures that lower both their direct and indirect CO₂e emissions, including those arising from their upstream value chains.

We expect our suppliers to protect natural ecosystems and to avoid contributing to their degradation, including deforestation or the alteration of natural woodlands and other habitats. We encourage our suppliers to act in line with requirements for non-deforestation and biodiversity impact screening.

All suppliers shall obtain, keep current and comply with all required environmental permits. Suppliers must comply with any reporting requirements of applicable permits and regulations.

Höegh Autoliners expects that changes or trends in each local law should be anticipated and considered and encourage all suppliers to take a precautionary approach to environmental challenges. Suppliers should monitor, track and take active measures to limit the use of energy, raw materials and natural resources, and to ensure minimum impact on air, soil and water quality. Such measures may include the use of renewable energy where available, recycling and waste handling procedures.

Additionally, suppliers are expected to avoid forced evictions and must not deprive communities of land, forests, or water resources during the acquisition, development, or use of such areas.

All suppliers must have adequate control over of all hazardous substances handled and suppliers handling chemicals must have appropriate measures in place to ensure adequate handling, storage and disposal.

Suppliers shall exercise due diligence with respect to sourcing, extraction and handling of raw materials.

Höegh Autoliners encourages all suppliers to seek out and prefer environmentally friendly solutions and/or technology when possible.

Höegh Autoliners' suppliers shall commit to applying best practices in environmental management in its operations (including energy and resource efficiency, waste reduction, recycling and sustainable resources).

Ethical Standards

GIFTS, FAVORS, AND IMPROPER PAYMENTS

Höegh Autoliners will conduct its business affairs fairly and impartially in an ethical and proper manner. Business decisions made by suppliers of Höegh Autoliners should be made on the basis of quality, service, price and similar competitive factors.

Höegh Autoliners Suppliers must avoid any decisions that are, or give the appearance that, any decisions are or were influenced by business courtesies. A business courtesy is a gift or favour for which fair market value is not paid by the recipient. It might be a tangible or intangible benefit and would include, but is not limited to, such items as meals, drinks, entertainment, all forms of hospitality, recreation, transportation, discounts, tickets, passes, promotional material and the recipient's use of the donor's time, material or equipment.

Social amenities customarily associated with legitimate business relationships are permissible. These include the usual forms of entertainment such as lunches or dinners as well as occasional gifts of modest value. While it is difficult to define "customary," "usual" or "modest" by stating a specific amount, common sense should dictate what would be considered extravagant or excessive. Suppliers must not accept anything that would influence or is intended to influence their exercise of their independent judgment in pursuit of the best interests of Höegh Autoliners. If a disinterested third party would be likely to infer that it affected our judgment, then it is too much. All of our business dealings must be on arms-length terms and free of any favourable treatment resulting from the personal interest of any employee.

BRIBERY AND INTEGRITY

Höegh Autoliners Suppliers shall not engage in any corruption, bid-rigging, kickbacks, bribery or facilitation payments to government or ranking officials in connection to business related to supplying of Höegh Autoliners product or services. We expect all suppliers to act in accordance with international anti-corruption standards, including those set by the United Nations and the OECD, the UK Bribery Act, and the U.S. Foreign Corrupt Practices Act (FCPA).

Suppliers must record and report any offer, request, or receipt of bribes or facilitation payments. They are expected to actively challenge and refuse such requests—except in situations where personal safety is at risk. Suppliers must also provide training to relevant personnel to help them recognize, handle, and report these situations appropriately.

COMPETITION LAW

Suppliers must comply with all applicable competition and anti-trust laws and compete fairly and independently in the market. They must not engage in practices such as price fixing, market allocation, bid rigging, or the improper exchange of sensitive competitive information.

SANCTIONS AND EXPORT CONTROL

Suppliers must comply with all applicable sanctions and export control laws, including those of the UN, US, EU, and UK. They are expected to conduct due diligence and avoid engaging with sanctioned parties or providing restricted goods or services in connection with our business.

Legal Compliance

COMPLIANCE

Höegh Autoliners suppliers must comply with the law of each country and region inclusive of compliance with competition/anti-trust laws, sanctions and export/import law, and personal data protection laws in each country or region. Any potential conflict of interest shall immediately be disclosed to Höegh Autoliners.

Suppliers must also ensure compliance with applicable tax laws and maintain accurate and transparent financial records to prevent tax evasion and support responsible fiscal conduct.

All suppliers must observe and comply with relevant export control and sanction regimes and monitor changes to ensure compliance over time.

All suppliers to Höegh Autoliners must take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with providing services.

Suppliers are expected to conduct their business transparently and ensure that all transactions are accurately recorded in their financial reports and filings. They should also have appropriate controls in place to support reliable financial reporting.

CONFIDENTIALITY AND DATA PROTECTION

All Höegh Autoliners supplier shall respect proprietary information and intellectual property, obtained by the employee in the performance of his/ her work, preventing misuse, informal discussion or disclosing of such information to unauthorized persons and refrain from, with knowledge, making false or improper records of any document.

Suppliers must also implement appropriate data protection and information security measures, including compliance with the General Data Protection Regulation (GDPR) and other applicable privacy laws.

MONITORING AND RECORD KEEPING

Höegh Autoliners suppliers must maintain the necessary documentation to support its compliance and shall allow Höegh Autoliners the right of inspection and/or review of the respective documentation for assurance of the Höegh Autoliners Code of Conduct. We encourage suppliers to conduct regular self-assessments and share information on their environmental, social, and governance (ESG) performance.

In line with this Code, we assess supplier compliance through audits, self-assessments, and documentation reviews. If gaps are identified, suppliers are expected to develop and implement a time-bound improvement plan in coordination with Höegh Autoliners. Follow-up reviews and audits are conducted periodically based on our internal risk assessment procedures to monitor progress and ensure ongoing alignment.

Failure to comply with this Code may result in corrective actions, suspension, or termination of the business relationship with Höegh Autoliners.

REPORTING MISCONDUCT

In the event of a supplier, sub-supplier, prospective supplier or any other person or group believe that any of the listed elements of the Höegh Autoliners Supplier Code of Conduct have been violated or breached, this person(s) may report such activity with strict confidentiality. In the event a supplier or a supplier's employee wishes to report an issue confidentially, we expect them to either contact Höegh Autoliners' legal department or file a report through our whistleblowing hotline. We do not tolerate retaliation against anyone who raises concerns in good faith.

Suppliers are also encouraged to establish their own grievance mechanisms accessible to both internal and external stakeholders, to raise concerns related to human rights, environmental, or ethical issues.

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ENDORSEMENT AND SIGNATURE

The Company set out below confirms it has made diligent investigation of the matters subject of this document and hereby agrees that it will comply with the provisions set out herein. The person signing this document is authorized to do so on behalf of the Company.

Company:

Signature:

Position

Place and Date:

© 2025 Höegh Autoliners group. This code references intentionally internationally accepted principles such as International Labour Organisation's (ILO) International labour standard, OECD Guidelines for Multinational Enterprises and UN Global compact

This Supplier Code of Conduct is not intended to create new or additional rights for any third party.