



Eimskipafélag Íslands hf.

CODE OF CONDUCT

INTRODUCTION

Eimskip is a leading transportation company in the North Atlantic with connections to international markets and is specialized in worldwide forwarding services. The Company's vision is excellence in transportation and services.

Eimskip's name and reputation is one of the Company's most valuable assets, which needs an utmost protection on a daily basis.

The purpose of this Code of Conduct is to support Eimskip's mission and vision. It applies to all board members and employees of Eimskip and its subsidiaries and guides them in conducting the Company's daily activities in an honest, responsible and ethical way, based on its values and generally accepted professional standards of conduct. Suppliers and subcontractors are also required to conform to high standards.

Eimskip's aim is to secure a good return for *shareholders* with profitable growth, create value for *customers* with outstanding solutions and services, be an outstanding workplace for *employees* with great team spirit and ambition and show concern for the *society* with social responsibility and reduced ecological footprint.

HUMAN RESOURCES

Eimskip's employees, their knowledge and skills, are the company's greatest resource. The team consists of different individuals who undertake a variety of work and have a diversity of experience and knowledge. Through common values, the team acts in harmony, creating a dynamic company and an eligible workplace based on great team spirit and ambition.

Eimskip offers reliable transportation services with customers' needs at the forefront. The employees' mission is always to provide customers and co-workers with excellent services. This is performed with care and due regards for Eimskip's values.

Values

Daily work of Eimskip's employees is based on the Company's values: *Achievement – Cooperation – Trust*.

Communication

It is employees' duty to make every effort to be objective and fair in their reviews, feedback and comments on co-workers and their work within the Company and to show respect for each other. They are supposed to do their best to prevent that any kind of injustice occurs, such as bullying, sexual harassment or violence. They actively participate in the Company's activities and development with the aim of strengthening its corporate culture, as well as the team spirit and job satisfaction of employees in a creative working environment, characterized by ambition and joy.

Use of Company assets

Eimskip's assets are for the exclusive benefit of the Company and should not be used or traded for personal gain. Employees must exercise care in their use of these assets and should only use them for authorized purposes. They must use good judgement when using company assets and resources, such as email and social media.

Human Rights Policy

Eimskip respects human rights. The objective of the policy is twofold:

1. To ensure the human rights of Eimskip's employees
2. To ensure that Eimskip complies with laws and regulations on human rights

Eimskip commits itself to complying with all applicable laws and regulations on human rights concerning freedom of association, forced and compulsory labor, child labor and discrimination in respect of employment and occupation.

Freedom of association

Eimskip respects employees' right to join or not to join a labor union.

Forced and compulsory labor

Eimskip rejects and acts against all forms of forced and compulsory labor.

Child labor

Eimskip complies with international laws and regulations on the minimum age employees. The Company can decide on raising the age limit due to certain nature of jobs or according to laws and regulations in each country.

Discrimination in respect of employment and occupation

Eimskip rejects any kind of discrimination regarding employment and occupation.

Eimskip has issued various policies related to rights of its employees. These policies are Human Resource Policy, Wage Policy, Equal Opportunities Policy, Health Policy, Occupational Safety and Security Policy and Prevention Policy.

Eimskip encourages all employees to report any suspected human rights violation within the Company.

The Company requires its suppliers and subcontractors to respect human rights.

THE MARKET

Competition and fair business practices

Eimskip intends to grow its market position through excellent performance and services. The Company believes in fair competition through fair business practices and in compliance with applicable competition laws.

Customer service

Eimskip has always maintained a strong focus on the services provided to customers and employees are dedicated to work according to the Company's service policy. Under this, the Company provides total transportation services where customer needs and excellent services are the key focus, based on Eimskip's values.

Anti-Corruption and Bribery

Eimskip's policy is to fight against any kind of corruption and bribery. The Company and its employees strive to comply with applicable laws and regulations and with rules and general standards of business ethics and corporate governance at all times, to avoid conflict of interests and maintain confidentiality. Reasonable and appropriate gifts and entertainment are allowed. The Company's internal control and risk management is intended to spot abnormalities, including the risk of corruption and bribery.

Compliance with laws, regulations and rules

Eimskip is obliged always to comply with all applicable laws and regulations governing the professional activities of the Company, as well as complying with general standards of business ethics and corporate governance and with the Company's own rules.

Conflict of interests

Employees' duty is to avoid making decisions that lead to conflict of interests and they shall honor the rule that their interests and the Company's interests coincide.

Confidentiality

Employees must maintain the highest degree of confidentiality regarding all proprietary and confidential information they become aware of in their job concerning customers, shareholders and the Company's activities. Employees are bound to secrecy after employment termination. Employees' use of confidential information for their own or others benefit is prohibited.

Gifts and entertainment

Reasonable and appropriate gifts and entertainment are allowed, given or received for normal and legitimate business purposes. Gifts and entertainment should be reported to immediate superior. Cash or cash equivalents may not be given or received. Business decisions should under no circumstances be based on or influenced by the level of gifts or entertainment provided and they should not create conflict of interests.

Internal Control and Risk Management

Eimskip's internal control and risk management is intended to minimize risk of material misstatements and fraud and to spot abnormalities in the Company's operations, including the risk of corruption and bribery.

Data protection

Eimskip respects the fundamental right of data protection regarding individuals and will comply as reasonably practicable. Eimskip issues specific Data Protection Policy on how the company processes personal data.

Suppliers and subcontractors

Eimskip expects its suppliers and subcontractors to adhere to similar standards as the Company's employees. The Company is using Supplier Evaluation Questionnaire for evaluation of its suppliers and subcontractors.

Insider information and trading of shares

Eimskip is a publicly traded company with its shares listed at Nasdaq Iceland. In listed companies, all investors must have equal access to information about the Company.

The use and disclosure of material non-public information must be in compliance with applicable securities law and Eimskip's insider rules. Trading based on insider information

is strictly prohibited. Eimskip does not comment on matters related to financial results or expectations in a period of four weeks prior to announcements of the Company's interim and full year financial results.

CORPORATE SOCIAL RESPONSIBILITY

Eimskip is a registered participant of the UN Global Compact, the United Nation's initiative for social responsibility with respect to human rights, labor, environment and anti-corruption. With its participation, the Company has committed to manage its business operations so that the UN Global Compact and its Ten Principles become a part of the Company's strategy, culture and day-to-day operations. The Company has also committed to advocate the UN Global Compact and its Ten Principles through available communication channels and communicate annually on implementation efforts.

Eimskip's Corporate Social Responsibility (CSR) Policy is based on the Nasdaq ESG Reporting Guide, published in March 2017. The Nasdaq voluntary reporting guide focuses on 33 environmental, social and governance (ESG) performance indicators.

CSR Policy

Eimskip has for over a century offered reliable transportation services and the Company's vision is to reach excellence in transportation solutions and services. Eimskip focuses on creating shared value for its shareholders, customers, employees, society and other stakeholders.

Environment

Eimskip respects its environment and seeks to limit its impact on the ecosystem and reduce its environmental footprint.

Society

Eimskip offers employees equal opportunities in a safe and healthy working environment and endeavors to be a good corporate citizen, recognizing its responsibility to work in partnership with the communities in which it operates.

Governance

Eimskip strives to ensure open and transparent relationship between the Company's management, its Board of Directors, its shareholders and other stakeholders.

REPORTING OF VIOLATIONS

Employees who want to report suspected violations of this Code of Conduct or general compliance concerns should speak to their immediate superior or report to Eimskip's Compliance Officer. The Company will not accept any retaliatory action against individuals reporting actual or suspected violations in good faith.

Approved by the Board of Directors on 22 February 2018