

## Code of Conduct

### 1. Scope and objectives

Isavia's Code of Conduct applies to all Board members and employees within the Isavia Group and is intended to promote integrity in Isavia's operations, a good reputation and elaborate decision making

- The Board of Directors and management of Isavia Group intend to:
  - take the lead in setting an example and following up on the implementation of the Code of Conduct
  - monitor compliance with the Code of Conduct, respond to suggestions of possible violations and direct them through appropriate channels
- Each of us is going to adhere to the Code of Conduct and we commit to knowing and understanding it

### 2. Stakeholders

The Code of Conduct is followed and interpreted in accordance with its objectives and those of Isavia's stakeholders at any given time

Isavia stakeholders are as follows:

<ul style="list-style-type: none"><li>• Shareholder of Isavia<ul style="list-style-type: none"><li>• Customers</li><li>• Suppliers</li><li>• Employees</li><li>• Key partners at the airport</li><li>• Domestic and foreign regulators and governments</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Public Authorities and Public Interest Institutions<ul style="list-style-type: none"><li>• Air navigation partners</li><li>• Local community and municipalities</li><li>• Creditors</li><li>• Media</li><li>• Interest groups of stakeholders, business and professions</li></ul></li></ul>
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### 3. Responsible and good business- and governance practices

We comply with laws, regulations and guidelines that apply to our operations, as well as current strategy at any given time and the provisions of international treaties that apply to the company's operations

- We respect mandatory and good corporate governance
- We operate in line with responsible and good business practices and risk management
- We comply with competition laws and conduct business in a fair, honest and ethically responsible manner
- We are unequivocal in our conduct of business and do not push the boundaries of what is legally or morally right
- We show professionalism and integrity in our work, as well as confidentiality towards the company and customers
- Isavia generally does not award grants or allocate funds for purposes other than commercial purposes and does not participate in political activities
- We are committed to only doing business with suppliers that we believe are reputable and do not engage in any unlawful transactions or actions

### 4. Conflict of interest

Our interests and those of Isavia coincide. Our personal interests or those of related parties must never conflict with our professional duties and confidentiality towards the company

- We avoid conflicts of interest with Isavia and the company's customers
- We do not abuse our position
- We are never involved in decisions that we or parties associated with us may have a personal benefit from, nor do we engage in other work or positions that may create a conflict of interest with Isavia or the company's customers

## 5. Prevention of fraud and corruption

Fraud, bribery and corruption will never be tolerated, nor will any kind of improper facilitation

- All our business is conducted on an arm's length basis, i.e. on terms comparable to market terms between unrelated parties
- We strive to know and respect procurement rules
- Managers undertake to carry out all recruitment and promotion within the company on professional and transparent grounds
- We do not accept gifts or improper facilitation that may diminish credibility
- In case of doubt, we ask our immediate supervisor or seek advice

## 6. Social Responsibility

We are guided by sustainability in everything we do

- We are aware that the decisions we make affect many stakeholders, therefore we make decisions responsibly with our society, impact on stakeholders, the environment and the economy in mind
  - We take the initiative to increase sustainability in the airport community and our local community, and we place an emphasis on the mutual exchange of information, knowledge and experience
  - See further information on Isavia's sustainability policy and action plan.  
[Sustainability policy action plan](#)

## 7. Employees

We respect the work-related rights of employees, their human rights and equality, we treat each other with respect and respect each other's different opinions

- We put an emphasize on the welfare and legal security of our employees and do not tolerate any form of intimidation or coercion

- We emphasize diversity and equality of employees
- We emphasize training, health and safety
- We avoid engaging in any kind of inappropriate behaviour
  - For further information, see the Human Resources and Equality Policy [Human resource and gender equality policy](#), the Occupational Health and Safety Policy [Occupational safety and health policy](#), the Remuneration Policy, the Employee Handbook, the Culture Statement and the EKKO Plan

## 8. Protection of assets and information

We treat Isavia's assets as if they were our own value and respect Isavia's right to them

- It is the duty of all of us to dispose of Isavia's assets and funds only for the benefit of the company and not for personal use or for the benefit of us or third parties
- Assets refer to tangible assets, such as office equipment and computer equipment, intangible assets, such as trademarks, software and intellectual property rights, as well as information on Isavia, employees, customers, suppliers and other stakeholders
- We take special care in the handling of electronic data, we handle and store such data in a responsible and appropriate manner to ensure the confidentiality and security of such data
- We are all representatives of the company during and outside working hours, including on social media
- We are always mindful of our prudence and do not engage in any behaviour that may damage or impair Isavia's trademark or other related trademarks, or the reputation of the company and the company group
- See further information on Isavia's information security policy [Information Security Policy](#)

## 9. Disclosure

Our disclosure of information to stakeholders is at all times correct, concise and accurate, and we do not hide or manipulate information to our stakeholders

- We place great emphasis on transparency for our stakeholders regarding Isavia's corporate governance
- A communication plan is drawn up annually on the arrangement of communication with stakeholders
- We are aware of our right to express ourselves on behalf of Isavia and always direct media inquiries to the communication manager

## 10. Confidentiality

We handle confidential information with the utmost care and in line with applicable legislation, whether information concerns employees, customers, suppliers or partners

- We do not use confidential information for our own benefit or for the benefit of others
- For further information, see Isavia's information security policy and provisions on the processing of personal data on the company's external website [Data protection declaration](#)

## 11. Compliance and protection of whistleblowers

We are committed to never tolerate unfair business practices

- Each of us is responsible for ensuring that there is no violation of the law, the Code of Conduct, or any other rules or practices
- If we are in doubt as to whether there is a violation - it can help to ask ourselves the following questions:
  - Is this **legal** and in accordance with the company's policy and **Code of Conduct**?

- Is this **correct**?
  - Does this have a positive effect on your **image** and that of Isavia??
  - Would a **conscientious** person do this?
  - Do I feel **good** about myself because of this?
  - Am I ready to take **full responsibility** for this and **its consequences**?
  - Is it impossible for me to achieve the same goal in **another way** that does not raise moral questions?
  - Can I **tell** the relevant **stakeholders about** this?
- We follow approved guidelines for the protection of whistleblowers
  - Clear procedures are in place for the dissemination of information or data on suspicion or knowledge of violations of the law or other reprehensible conduct<sup>5</sup>
  - The Board of Directors and Executive Board undertake that all suspicions will be investigated and violations will be dealt with in an orderly and coordinated manner
  - The management guarantees that no one will be punished for such a notification in good faith

## 12. Entry into force and revision

Isavia's Code of Conduct enters into force upon signature by the Board of Directors and is reviewed annually and more frequently if necessary.

Reykjavík 16th of September 2024  
The Board of Isavia ohf.