



# Code of Conduct

doing the right thing every day.



***“Our Code of Conduct is central to how we operate.”***

## **A message from our CEO**

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Every day, we handle internet connectivity, calls, and text messages for more than 1.7m. Danish customers. Stable and secure means of communication is a vital task today, and we take great pride in providing this to our customers.

Taking on this responsibility also includes an obligation to observe our Code of Conduct and constantly consider how to act as an ethical telco operator and a critical infrastructure provider.

Our Code of Conduct is central to how we operate. It shapes our decisions, helps us respond responsibly to a changing world, and underpins the trust we aim to build – with our customers, our colleagues, and society at large.

To 3, having and observing our Code of Conduct will always be more than just words on a page. The ability to communicate over distances binds and builds society together more than almost anything else. If society is to truly benefit from the technologies and solutions we provide, it is essential that we facilitate safe and secure communication in an ethical manner.

I hope the following pages offer a clear and transparent insight into how we continuously work to deliver critical infrastructure to our customers – guided by moral principles, ethical decision-making, and a commitment to transparency in everything we do.

**Morten Christiansen**  
Regional CEO at 3 Scandinavia and Austria





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# Who we are

## Our history

Hi3G Denmark ApS (hereafter 3) began in 2003 with a clear ambition to challenge the established telecom market by being the first to launch a 3G network in Denmark. At the time, few believed we could succeed, but we did. That early experience shaped the resilience and winning mentality that still characterizes the culture at 3 today. There is a spirit and determination here to succeed, to grow, and to prove our doubters wrong.

Over the years, 3 has become a successful company, turning losses into stable profits. The road to that success lies in our ambition and our constant drive

to challenge the market and be first with the latest innovations that make the mobile experience better and more user-friendly for our customers.

## Vision

To be at the forefront of future digital solutions that improve the way we live.

## Mission

Through innovative and user-friendly solutions and a strong network, we pave the way for a life where being connected has never felt more free. Free from limitations. Free from hassle. Free from worries.



## Our core values

This ambition is only possible because of our employees. At 3, it's not background or job title that matters but attitude, drive and the will to contribute. We value people who take initiative, speak up, and work together to solve problems. Our culture is shaped by this mix of openness, commitment and forward thinking – strengthened by the solid competencies and experience our employees bring to the table.

- We believe in trying things out, even if success isn't guaranteed. We learn by doing. We test ideas, we adjust quickly, and we keep moving. That's how we stay competitive and creative.
- We also believe that different perspectives make us stronger. Diversity, of thought, background and personality, isn't something we just talk about. It's part of how we find better solutions and build a good workplace for everyone.
- And finally, we believe in trust. People at 3 are given room to make decisions and take ownership. In return, we expect honesty, accountability, and a willingness to learn, especially when things don't go as planned.

Together, these values form the foundation of how we work. They guide our choices, shape our collaboration, and help us deliver meaningful results for each other and for our customers.



## Our guiding principles

### Forward-thinking

We dream big and set the bar high in everything we do. Our goal is to keep our customers one step ahead.

### Opportunity

We create new possibilities by building on what exists today and surprising with what's coming tomorrow.

### Simplicity

We turn even the most complex challenges into simple, understandable solutions. Life is complicated enough as it is.



# Our Code

We are committed to upholding the highest standards of ethical and responsible business conduct at all times.

## Why do we have a Code of Conduct?

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Because our success depends not only on what we achieve but how we achieve it, we have distilled our values into a clear Code of Conduct.

The Code serves as the cornerstone of our business practices and interactions. It outlines the ethical principles and standards that guide our actions every day, ensuring we treat each other and our customers with integrity and respect. Adhering to our Code furthermore underscores our commitment to compliance with applicable laws and regulations, protecting our reputation and fostering a company environment we can all be proud of.

## Who does the Code apply to?

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Everyone working for 3 is expected to uphold this Code regardless of role or seniority, including anyone acting on our behalf (consultants, temporary employees, etc.). We also expect our suppliers and partners to share similar ethical standards and follow 3's [Supplier Code of Conduct](#). No business objective or instruction from a superior can justify breaching this Code or the law. Ethical business conduct is everyone's responsibility at 3, and each individual is expected to contribute to our culture of personal integrity.

## Your personal responsibility

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While the Code cannot cover every scenario, it sets out the principles and standards that guide our decisions. Use it alongside our internal policies, rules and procedures that address the subjects of the Code in more detail. If you face a dilemma not explicitly answered here or elsewhere, consider these questions: Is it legal? Does it align with our values and this Code? Would I feel comfortable if my actions were made public? If the answer is no, or if you're unsure about the right course of action, [speak up immediately](#). After all, no document, including this Code, is a substitute for your good judgment.

## Lead by example

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As a manager at 3, you carry an increased responsibility. You are expected to lead by example in your behavior, communication, and decision making, and to demonstrate the judgment and integrity that reflect the culture we want to build. Your employees must feel safe coming to you with questions, concerns, or dilemmas, knowing they will be taken seriously and supported without fear of negative consequences. You must also make sure that your team comply with applicable laws, regulations, and internal policies, and make it clear that our Code must be followed at all times.



# Our workplace environment

Our workplace environment is the foundation of our success. We thrive when we treat each other with dignity, work in safe and healthy conditions and respect the planet that sustains us. Building an inclusive, supportive and sustainable culture helps us attract and retain talent and live up to our values.

## Diversity and inclusion

We embrace diversity among our staff and work to create an inclusive working environment that ensures equal opportunities for all and does not tolerate discrimination and harassment.

We work to create equal opportunities for all workers and to treat everyone with respect and avoid harassment in the workplace.

We are committed to obtaining gender balance at management level and diversity with clear objectives. We endeavour to ensure that all employees are recognised for their skills and can pursue and develop their careers within the 3 framework and opportunities.





## Non-discrimination efforts

We actively promote non-discrimination in employment and labour relations.

We do not discriminate in recruitment, remuneration, access to training, promotion, dismissal, pension, working conditions, work assignments or discriminate on the basis of personal characteristics such as, for example, race, age, religious beliefs, gender or gender identity, sexual orientation, health, age, disability, political opinions, nationality, ethnic origin or membership of a workers' organisation.

We take responsibility for maintaining a workplace free from discrimination or harassment. We are committed to ensuring that recruitment, development, compensation and promotions are based on merit, performance, skills and experience. Violation of the Code of Conduct may lead to labour law consequences.

### You must:

- Treat everyone with dignity and respect, regardless of their role or background.
- Hire, promote and reward based on merit, skills and performance.
- Avoid nepotism.
- Respect cultural and personal differences and seek to learn from diverse perspectives.
- Speak up if you witness discrimination or harassment, and support those who raise concerns.

### Learn more:

- [Politik for kønsbalance og Mangfoldighed](#)
- [Menneskerettighedspolitik](#)

## Workplace health and safety

Our employees are our greatest asset, so we are committed to maintaining a safe and healthy work environment whether in the office, in stores, or out in the field. Our safety culture is built on responsibility and care. We fully comply with all occupational health and safety laws and continually work to identify risks and implement improvements. Our Health and Safety Committee (Arbejdsmiljøudvalg), with both employee and management representation, regularly evaluates conditions, manages safety training, reviews incidents and recommends actions for continuous improvement.

### You must:

- Follow all safety procedures and guidelines applicable to your job.
- Identify, raise and mitigate health and safety risks.
- Proactively help to create an environment that promotes health, safety, and wellbeing for all.

### Learn more:

- [Arbejdsmiljø - Intranettet](#)



## Human rights

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We support and respect internationally recognised human rights, including the principles enshrined in the Universal Declaration of Human Rights. We have adopted and approved a human rights policy. We support the effective abolition of child labour and do not employ persons of school age or younger than 15 years (or 14 years where permitted by the ILO Convention 138). 3 protects young workers up to the age of 18 from any form of work that could jeopardise their health or safety.

**Learn more:**

- [Menneskerettighedspolitik](#)

## Labour rights

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We strive to uphold the freedom of association and recognise the right to collective bargaining without fear of reprisal, intimidation or harassment. We discourage any form of discrimination against workers, whether the worker chooses to organise or not, and we comply with all applicable laws, regulations and collective agreements on minimum wages and maximum working hours. We are not involved in any way, directly or indirectly, in human trafficking and support the abolition of all forms of forced labour. We cherish and ensure a healthy and safe working environment.



## Sustainability

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At 3, we view sustainability broadly – balancing environmental care, social equity and long term economic value. Our approach is guided by global standards (the UN Global Compact's principles and the EU's CSRD for transparent reporting) and focused on concrete action. For example, network upgrades have helped improving our network efficiency. We've launched circular initiatives such as '3LikeNew' and 'Byt til nyt', aiming to increase the life cycle of devices and reduce resource depletion. In 2024, 128 employees took part in our 3Academy development program and we joined Copenhagen's Coding Class to teach programming in local schools. Efforts like these are showcased in our yearly sustainability report and show how 3 is reducing its footprint and expanding positive impact.

Everyone at 3 can make a difference. We encourage all colleagues to integrate sustainability into their work, thinking long term, and promoting responsible product design.

### In practice, this means employees should:

- Reduce environmental impact: Minimize waste, energy use and emissions in daily tasks (for example, by recycling, using energy efficient devices or choosing green travel options).
- Promote inclusion and fairness: Respect and value each colleague, support diversity and equal opportunity, and help everyone grow.
- Embrace circular practices: Use and advocate for circular solutions (like our 3LikeNew refurbished phones), recycle or repair equipment, and design work processes to extend product life.
- Engage with community and learning: Participate in our initiatives (such as Coding Class outreach and internal training), share your skills with others, and suggest ideas for innovation.
- Uphold our standards: Follow 3's sustainability policies, complete any required training, and speak up with suggestions or concerns to help us improve.

### Learn more:

- [Newest sustainability report](#)
- [Supplier Code of Conduct](#)
- [Miljøpolitik](#)



Conducting business with integrity means obeying the law, competing fairly and building relationships based on trust. By maintaining high ethical standards in all business dealings, we protect our reputation and uphold our responsibilities to customers, shareholders and society.

# Fair and ethical business practices

## Anti-corruption and anti-money laundering

3 has zero tolerance for corruption or money laundering in any form and complies with all applicable anti-corruption and anti-money laundering laws, directives and regulations. No employee may ever participate in, enable, or benefit from corrupt conduct, money laundering or the financing of criminal activities.

### What is corruption?

Corruption is the abuse of entrusted power and funds for personal gain. It can take many forms and often occurs in subtle or indirect ways. The most common form is bribery which can be disguised as gifts, hospitality, discounts, donations, sponsorships, “consulting” fees, or personal favours. The risk is

higher when dealing with public officials, suppliers, consultants, or other third parties, especially where expectations or power imbalances exist. Even small benefits, if offered or received in the wrong context, can undermine trust and breach the law.

### Money laundering

Money laundering involves disguising the origin of funds obtained through illegal activities, so they appear legitimate. 3 takes the necessary precautions to prevent any form of active or passive involvement in money-laundering activities and does not tolerate the misuse of its operations or services for financial crime.

### You must:

- Never offer, give, or accept bribes, kickbacks, cash, or other improper advantages.
- Only accept or offer hospitality, small gifts or business courtesies if they are modest, transparent, and in line with company rules.
- Never provide gifts or hospitality to public officials or companies partly owned by a public entity.
- Treat all customers, suppliers, and partners fairly, without undue influence.
- Immediately report any suspected corruption or unethical conduct.

- Not make political contributions, directly or indirectly, to political parties, candidates, or public officials on behalf of the company or its affiliates.

- [Use the gift register.](#)

### Learn more:

- [Politik for Anti-korruption og Anti-bestikkelse](#)



## Avoid conflicts of interest

A conflict of interest arises when your personal interests, relationships, or external roles could affect, or appear to affect, your ability to act in 3's best interests. Conflicts are not wrong in themselves, but if they are hidden or poorly managed, they undermine trust, create opportunities for misconduct or corruption, and can weaken confidence in our decisions.

You are expected to use sound judgment and be open about any situation that might influence your decisions. If you see a potential conflict of interest, do not ignore it. Disclose it promptly to your manager so it can be assessed and, if needed, managed. Remember, a conflict may still exist even if the decision benefits 3.

### It's not possible to list every scenario in which a conflict can occur, but here are some examples:

- Hiring or supervising a close friend or family member without disclosing the relationship.
- Having a financial interest in a company that does business with 3.
- Accepting outside employment with a competitor, supplier, or customer.
- Using confidential company information for personal benefit or for someone close to you.
- Awarding contracts to a company owned by a friend or family member, even if they offer a fair price, without disclosure.

## Insider trading

Although 3 is not a publicly listed company, we may gain access to non-public, price-sensitive information about other companies such as suppliers, partners, customers, or our parent companies. This makes us "insiders" with legal obligations to protect that information. Inside information is any non-public information that, if made public, could influence the price of financial instruments such as shares, bonds, or derivatives.

### Examples include but are not limited to:

- Upcoming financial results or earnings reports.
- Planned mergers, acquisitions, or divestments.
- Major strategic or regulatory decisions.
- Other sensitive business developments.

Using such information to buy, sell, or recommend financial instruments is insider trading and is strictly prohibited. Sharing insider information to others so they can trade, known as tipping, is also illegal and treated just as seriously, even if you receive no personal benefit.

### You must:

- Never buy, sell, or attempt to trade financial instruments when you possess inside information.
- Never encourage others to trade based on inside information.
- Never share inside information with anyone unless they are directly involved in the project and have a clear business need to know.

## Compete fairly

At 3, we compete vigorously, but always fairly. We believe that open competition drives innovation, quality, and better outcomes for our customers. We therefore never seek business advantages through illegal or unethical means and comply with all relevant competition and antitrust laws.

This means we do not engage in agreements or arrangements that have an impact on prices, conditions, strategies, customer relations or any other agreements that restrict competition. We never exchange sensitive information with competitors, and actively discourage and must not participate in or contribute to cartelisation. This is especially important in meetings held in the industry associations 3 is part of.

Misusing confidential information from competitors or suppliers is also strictly prohibited, as is abuse of a dominant market position.

### Example scenario

*Scenario: At an industry conference, a competitor's representative suggests that both companies raise prices next quarter to improve margins.*

*What happens next? You immediately end the conversation, state that 3 makes independent pricing decisions and report the incident to your manager and Legal.*



*Key takeaway: Even discussing or listening to conversations about price-fixing can be illegal. Always make it clear that you do not want to participate further because you think this is a competition issue, step away from the situation, and promptly inform your manager and Legal.*

### Learn more:

- [Konkurrenzeretlig Compliance Manual](#)



## International trade and sanctions

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We are committed to conducting international business in full compliance with applicable laws and regulations on trade, export controls, and economic sanctions issued by relevant national and foreign authorities and international organisations.

Trade restrictions exist to prevent the misuse of global commerce, including in connection with armed conflict, human rights violations, and organised crime. As such, we must understand who we are doing business with, what we are trading, and whether any limitations apply.

We have put in place the necessary processes and procedures to assess business partners and screen for sanctions risks before engaging in cross-border activities. Restrictions may apply not only to countries and companies, but also to individuals, ownership structures, and the nature of the goods or services involved.

### Learn more:

- [Supplier Screening Program](#)

## Requirements for suppliers

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We expect our suppliers to comply with 3's standards and principles of supplier behaviour, in addition to the law, and to respect our Code of Conduct and ethical standards when working with them.

Our cooperation with suppliers is based on an open and honest dialogue. If suppliers do not comply with the applicable requirements, this may lead to termination of the co-operation. 3 employees are expected to openly and promptly report any instances that may constitute non-compliance with our supplier guidelines, and suppliers or others are encouraged to report non-compliance with this Code of Conduct.

We have separate guidelines for suppliers, which we require them to comply with and which they are notified of at the start of the contractual relationship. Read more in our Supplier Code of Conduct [here](#).

## Risk management

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Responsible and sustainable business requires effective risk management. At 3, we take a structured approach to identifying, assessing, and addressing risks across all areas of the company – from strategic and financial risks to operational and regulatory ones. This helps us make informed decisions and enables management and owners to maintain effective oversight of the company's overall risk profile and exposure. For more information, see the [Risk Management Policy](#) and the relevant area-specific policies.





Our assets, both tangible and intangible, are vital to our operations and success. We are committed to protecting these, as well as any assets or information entrusted to us by our customers or partners.

# Our assets

## Privacy

Telecommunication is becoming ever more digital and data driven. At 3, we process large volumes of personal data every day from our customers, business partners and colleagues. Safeguarding personal data is not only a legal obligation, it is also essential to maintain trust, protect our reputation, and ensure the integrity of our services.

Personal data includes any information that can directly or indirectly identify an individual, such as names, addresses, phone numbers, email accounts, identification numbers, payment details, IP addresses, location data, data from cookies or usage patterns. Personal data must be processed lawfully, transparently, proportionately and with respect for individual rights.

At 3, we comply with all applicable regulations and follow strict internal procedures to ensure that data is managed responsibly, and we continuously implement protective measures to maintain the highest standards of privacy and security.

**As an employee, you share a responsibility for protecting personal data. This means:**

- Following our internal policies, rules, and procedures.
- Complying with relevant legislation such as GDPR.
- Applying good judgment when accessing, sharing, or storing data.
- Escalating potential risks or uncertainties to the appropriate channels.
- Making sure that you only access and process personal data when you have a legitimate purpose and strictly limit access to information that is relevant and necessary for that purpose.
- Immediately reporting any personal data breach through the designated reporting process.

**Learn more:**

- [Privatlivspolitik - Generelt for Håndtering af Persondata](#)
- [Persondatapolitik for Medarbejdere](#)
- [Opbevarings- og slettepolitik](#)
- [Politik for Dataetik](#)

## Artificial intelligence

At 3, we embrace the transformative potential of artificial intelligence (AI) to create value and drive efficiency across our entire organization. At the same time, we recognize our responsibility to manage the risks that follow from using this technology – and our employees play an active role in that.

Because our data is a critical asset, you are expected to evaluate the risks and ethical considerations when using AI. Before using any AI technology in your work, you must understand its capabilities and limitations, follow internal rules and guidelines, and complete the mandatory training on responsible AI use.

Only AI tools approved by 3 may be used. Any new AI tool must be submitted to the AI Committee, which will assess whether it complies with 3's AI Policy and principles and may set specific conditions for its use.

**To support responsible and effective AI use, 3 has established several initiatives:**

- AI Champions Program – strengthens employees' AI skills and supports responsible and effective use of Microsoft Copilot, our central AI system.
- AI Taskforce – a cross-organizational, employee-driven initiative that fosters active and informed engagement with AI development and use in 3.
- Compliance Ambassadors – ensure strong local anchoring of knowledge on compliance and data ethics including but not limited to AI.

**You must:**

- Use only approved AI tools and follow internal guidelines.
- Think critically about AI outputs and validate information before acting on it.
- Escalate non-approved tools to the AI Committee before use.

**Learn more:**

- [Politik for AI](#)



## Information security

As a provider of critical communication services, we must ensure the confidentiality, integrity, availability and authenticity of the information and systems under our care. We work from a risk-based approach and maintain rigorous information security practices to protect company and customer data from unauthorized access, alteration, loss, or theft. This includes complying with applicable cybersecurity regulations (such as the EU NIS2 Directive) and continually strengthening our defenses against evolving threats.

We all share responsibility for protecting information. You are expected to follow our internal security policies, use company systems and devices safely, and remain vigilant against the increasing risks from cyber-attacks like phishing, malware, or other attempts at unauthorized access. Extra caution is expected when working remotely to ensure that security is never compromised.

### You must:

- Protect company information from accidental or unauthorized disclosure, misuse, improper alteration, or destruction.
- Report any security incidents immediately and in accordance with laws, procedures, and guidelines.
- Always follow the correct procedures for granting access to systems.
- Only use 3-approved systems for information sharing and data storage.
- Always wear a visible ID card when on the office premises.

### Learn more:

- [Information Security Policy](#)
- [Acceptable Use of IT Resources](#)
- [Hi3G Security Policies](#)

## Confidential information

At 3, the data we collect, the information we create, and the ideas we develop are central to how we innovate, grow, and stay competitive. But if this information is shared with the wrong people, even by mistake, it can harm our business, damage trust, and give competitors an unfair advantage. Protecting it is therefore essential. To do so, we continuously assess the need for new measures and make sure that the protection of our data and information remains adequate.

### Examples of what should be protected:

- Intellectual property: Unpublished creative work, proprietary know-how, trade secrets, unpublished designs, internal algorithms, source Code, technical specifications, and trade secrets that are not publicly disclosed.
- Company information: business plans, marketing strategies, product roadmaps, and customer or supplier lists.
- Financial information: budgets, forecasts, reports, and other figures not shared publicly.
- Technical and research information: network designs, research results, and development plans.

### How to keep it safe:

- Think before you share: Only share information with people who truly need it for their work and ensure proper agreements are in place when sharing outside the company.
- Be aware of your surroundings: Avoid discussing sensitive topics in public places such as cafés, airports, or elevators.
- Use the right tools: Always store and share information through 3's approved systems.
- Respect others: Just as we protect our own ideas and data, we also respect the confidentiality and intellectual property of customers, suppliers, and partners.
- Stay alert: Watch out for phishing attempts or suspicious emails and report them immediately.
- Remember after you leave: Your duty to protect 3's information continues even after your employment ends. Never share it with future employers and never ask new colleagues to share confidential information from previous jobs.





# Breach of the Code of Conduct and speaking up

At 3, we expect all employees and representatives to uphold our Code of Conduct and to follow the principles of responsible and ethical behavior set out within it.

We do not tolerate retaliation against anyone who, in good faith, reports a suspected violation of the Code. Employees are encouraged to raise concerns directly with 3. Where appropriate, reports can be submitted through 3's whistleblowing hotline, which allows for anonymous reporting and can be accessed [here](#).

## The whistleblowing hotline may be used to report suspected breaches of the Code of Conduct as well as other serious concerns, including:

- Breaches of confidentiality obligations.
- Misuse of financial resources.
- Theft, fraud, embezzlement, or bribery.
- Serious or repeated violations of company policies or law.
- Sexual harassment or other severe workplace misconduct, including harassment, discrimination, assault, or violence.
- Breaches of EU law, as defined in Article 2 of the EU Whistleblowing Directive.
- All employees have a duty to report, promptly and without undue delay, any behavior that directly contravenes the Code of Conduct.

## Dialogue-based approach

As far as possible, we always encourage that any issues are resolved in the first instance by contacting your line manager, legal or HR.

All managers in 3 have a duty to ensure that employees are aware of the channels through which offences can be reported. In cases where an employee is unable to report a matter via his/her immediate manager, legal or HR, a report can be made via the whistleblowing hotline. The whistleblowing hotline is thus a supplement to the direct, open, and daily communication.

If one or more employees violate the Code of Conduct, 3 always initiates an investigation and dialogue to uncover the circumstances.

## Consequences of violating the Code of Conduct

We are all responsible for complying with our Code of Conduct and for preventing and reporting any breaches in a timely manner. If employees violate this Code, they may be subject to employment law consequences.

## Contact for questions regarding the Code of Conduct

3 wants to help create the best possible basis for an open and honest dialogue about relationships and acceptable behaviour.

Therefore, the line manager or HR is always available to assist an employee in case of any doubts or questions about compliance with this Code of Conduct or practicalities of reporting a case.

## Learn more:

- [Whistleblowerpolitik](#)

