

Reginn hf. and Subsidiaries' Code of Conduct and Ethics

Reginn hf. is a progressive real estate company that invests, rents and manages commercial properties. Reginn hf. emphasises professionalism and aims to be its customers' first option. This Code of Ethics lays down the general duties of employees, the main objective being to encourage honesty, justice and fairness in business, and strengthen trust between the company and its customers, as well as the public. This Code of Ethics applies to all Reginn hf. and subsidiaries' operations, as well as all its employees and managers.

1. The values of the company

Reginn hf.'s values are **solution oriented, responsible and sharp**

2. Laws and rules

Reginn's operations emphasise always complying with the law and general guidelines about business ethics. Employees must know the legal environment in which the company works. The company also establishes internal rules and guidelines, according to which employees work.

When hired, all employees shall confirm that they have read, understood and will work according to the rules of the company.

3. Reliability

Reginn hf.'s employees shall maintain confidentiality and are obliged to maintain professional secrecy, according to law, about whatever they may come across on the job regarding the customers of the company and the company's operations.

Reginn hf.'s employees must ensure that information given is as accurate and correct as possible.

4. Employees

Reginn hf.'s employees shall seek to be guided by fairness and equality in all their business dealings and communication. Employees must be honest in all their dealings.

Respect, honour, fairness, and politeness shall characterise all communications with customers, co-workers, and other business associates. Harassment and discrimination on the

grounds of gender, ethnicity, sexual orientation, origin, skin colour, religion, age, disability, marital or family status, is strictly prohibited.

Employees are obliged to take good care of tools, machines and other data or equipment in the companies' possession, and the same applies to the company premises. At the end of each workday, employees shall leave their desks neat and tidy and place confidential documents in a locked storage.

Smoking is prohibited in the company's premises. Should an employee be discovered to have used illegal drugs, his or her employment will immediately be terminated.

Private errands must not be run during work hours unless with a supervisor's approval. Employees shall not use any equipment that belongs to Reginn hf. for private reasons, unless it has been specifically negotiated.

Employees are not authorized to incur expenses or oblige Reginn hf. or its subsidiaries in any way, without approval from designated parties, and with the executive director's approval.

5. Conflict of interest

Neither executives, nor employees shall let private interest collide with the company's or its customer's interest. Employees must report possible conflict of interest to the compliance officer or nearest supervisor.

Executive directors and the compliance officer are, as the case may be, responsible for making sure that these rules and work processes based on them, are followed.

Thus approved by Reginn hf.'s Board of Directors on 11 April 2019

Albert Þór Jónsson

Bryndís Hrafnkelsdóttir

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