

## Purpose and Scope

Samskip Group, hereinafter referred to as “Samskip”, is a global logistics company offering transport related services by land, sea, rail and air with a particular focus on cost efficient, reliable and environmentally friendly transport. Samskip has offices in 24 countries in Europe, North and South America, Asia and Australia, employing 1,450 people around the world.

Throughout our network, mode of transport is offered based on competitive pricing, optimal transit time and environmental sustainability. In all cases, shippers can consider the modal combinations that best meet their logistics requirement, making real choices based on frequency of service, transit time, freight rates and sustainability.

Samskip considers sustainability to be one of the fundamentals of doing business, as sustainability stands for the long-term continuity of our business and of society.

We are committed to seizing every opportunity to be more sustainable. By focusing our efforts on the Social & Environment, Quality and Professionalism principles, Samskip will ensure a reduced carbon footprint.

Samskip adheres to this commitment by operating an Environmental Management System that is certified by the ISO14001:2015 standard. In line with the principles, Samskip aims to:

- Minimize how it’s operations negatively affect the environment
- Comply with applicable laws, regulations, and other environmentally oriented requirements
- Continually improve the above.

At Samskip we believe acting ethically and responsibly is not only the right thing do, but also the right thing for our business. Samskip has developed a supplier Code of Conduct (“supplier code”) to clarify our expectations in the areas of business integrity, labour practices, associate health and safety and environmental management.

The provisions as set forth in this Supplier Code provide the minimum expectations for suppliers. These minimum expectations are based on the general principles contained in the UN Global Compact as made operational with the UN Guiding Principles and Human Rights, referencing the International Bill of Human Right (IBHR), the International Labour Organisation Declaration on Fundamental Principles and rights at Work (ILOD), the Rio Declaration on Environment and Development, the United Nations convention against Corruption and other relevant international principles. In addition to this, Samskip expects suppliers to adhere to all applicable laws, rules, and regulations where they operate. If national regulations provide for better or lesser protection of human right, including labour rights, environmental protection, or protection against corruption, than provided for by the minimum standards referenced in this Supplier Code, the supplier shall apply the higher standard. If there is a conflict between national regulation and the minimum

standards referenced in this Supplier Code, supplier shall report this to Samskip and seek – to the extent possible – to honour the internal principles and standard referenced in this Supplier Code while adhering to national regulation.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Samskip entities worldwide are expected to follow this Code.

## General Conditions Code of Conduct

We expect from our suppliers that they comply with the applicable national laws and legislation and abide by the values and principles described in this Code of Conduct. In addition, we expect that the values and principles of this Code are also declared applicable for companies in the supply chain that deliver goods and services to our suppliers.

Samskip expects its suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to comply with all applicable laws and regulations of the countries of their operation.

Suppliers are expected to maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Supplier should support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Samskip.

To conduct business with Samskip, suppliers must enter into contracts that mandate compliance with the Supplier Code. With prior notice, Samskip may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.

Suppliers should report suspected violations of the Code.

## Regulations Code of Conduct

### 1. Professionalism

- We expect our suppliers to always fully operate in compliance with the relevant laws and regulations.
- Subcontractors and suppliers are expected to deliver high quality services and products and are expected to keep a record of transactions in accordance with applicable procedures and handle information carefully.
- Suppliers are deemed to respect and be committed to the principles and values of Samskip and to refrain from conduct and actions that may undermine Samskip's reputation.

### 2. Safety

- Subcontractors and suppliers are required to comply with the applicable safety rules and regulations.

- We expect that they remain aware for our and their own safety, as well as that of others. Subcontractors and suppliers are expected to do their utmost to report unsafe situations and immediately solve them.

### **3. Sustainability**

- Samskip expects its suppliers to consider and contribute to environmentally acceptable and energy saving solutions and operations (e.g. conservation of natural resources, recycling, source reduction and pollution control) which we are able to offer to our client and principals and are able to use in our company operations.
- Suppliers are expected to know and undertake their responsibility with regard to the environment and surroundings.
- Suppliers should comply with all applicable environmental laws and regulations.

### **4. Employees**

- Suppliers shall encourage a diverse workforce and provide a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience.
- Suppliers shall treat employees fairly, including with respect to wages, working hours and benefits.
- Suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices, working hours and wages. Benefits will be consistent with laws and industry standard, including those pertaining to minimum wages, overtime, other element of compensation and legally mandated benefits.
- Under no circumstances shall a supplier discriminate or act in a discriminating manner in the process of employing or hiring personnel, equipment, and services. This includes the awarding of compensation, access to education and training, termination of agreements and retirements.
- Suppliers shall maintain and promote fundamental human rights. Employment decisions will be based on free choice and there may be no coerced or prison labour, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control.
- Consistent with applicable law, Samskip suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.
- Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and comply with relevant International Labour Organization (ILO) standards. In no instance, shall a supplier permit children to perform work that exposes them to undue physical risk that can harm physical, mental, or emotional development or improperly interfere with their

schooling needs.

- Suppliers shall provide safe and healthy working conditions.
- Samskip suppliers shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, suppliers shall provide the opportunity to have access to potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

#### **5. Corruption and bribery**

- Samskip is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials or other third parties are strictly prohibited. 'Corruption' generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.
- Suppliers shall not, directly nor indirectly, engage into any practices of corruption, including extortion, fraud and/or bribery. Suppliers shall comply with all applicable anti-corruption and anti-bribery laws, rules and regulations including the OECD convention on combating bribery of foreign public officials in international business transactions and the UK Bribery Act 2010. Suppliers shall make no expenditures other than for lawful purposes. Suppliers shall make no payments, gifts or promises to public officials or principals and representatives of the principal to obtain/retain business or projects or to obtain other improper advantage.
- Suppliers shall keep clear and transparent records of all expenditure and of hours spent in the execution of the agreement. Such records are to be available for regular monitoring by Samskip. In addition, supplier is expected to rule out any of these practices within their supply chain.
- Suppliers shall compete fairly for Samskip's business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.
- Suppliers are prohibited from providing or offering gifts to Samskip employees that could inappropriately influence Samskip's business decisions or gain an unfair advantage.