

Supplier Code of Conduct

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A word from our CEO

Dear valued supplier,

At Svitzer, we are committed to maintaining the highest standards of integrity and responsible business practices. This applies across our markets and regions, sea and shore, and across all of our functions. Wherever and whenever you are in touch with Svitzer, our core values guide the choices and decisions we make to ensure that we operate our business in an ethical and upright manner.

As a valued supplier to Svitzer, you play an integral role in the way we conduct our business and how we deliver value to customers globally. As a global leader in sustainable marine services, we are committed to collaborating with suppliers who are strongly focused on responsible business practices.

This Code of Conduct clearly outlines the minimum requirements we expect our suppliers to follow. These requirements are based on the United Nations' Universal Declaration of Human Rights, ISO standards on Health, Safety and

Environment, and the core labour conventions of the International Labour Organisation (ILO).

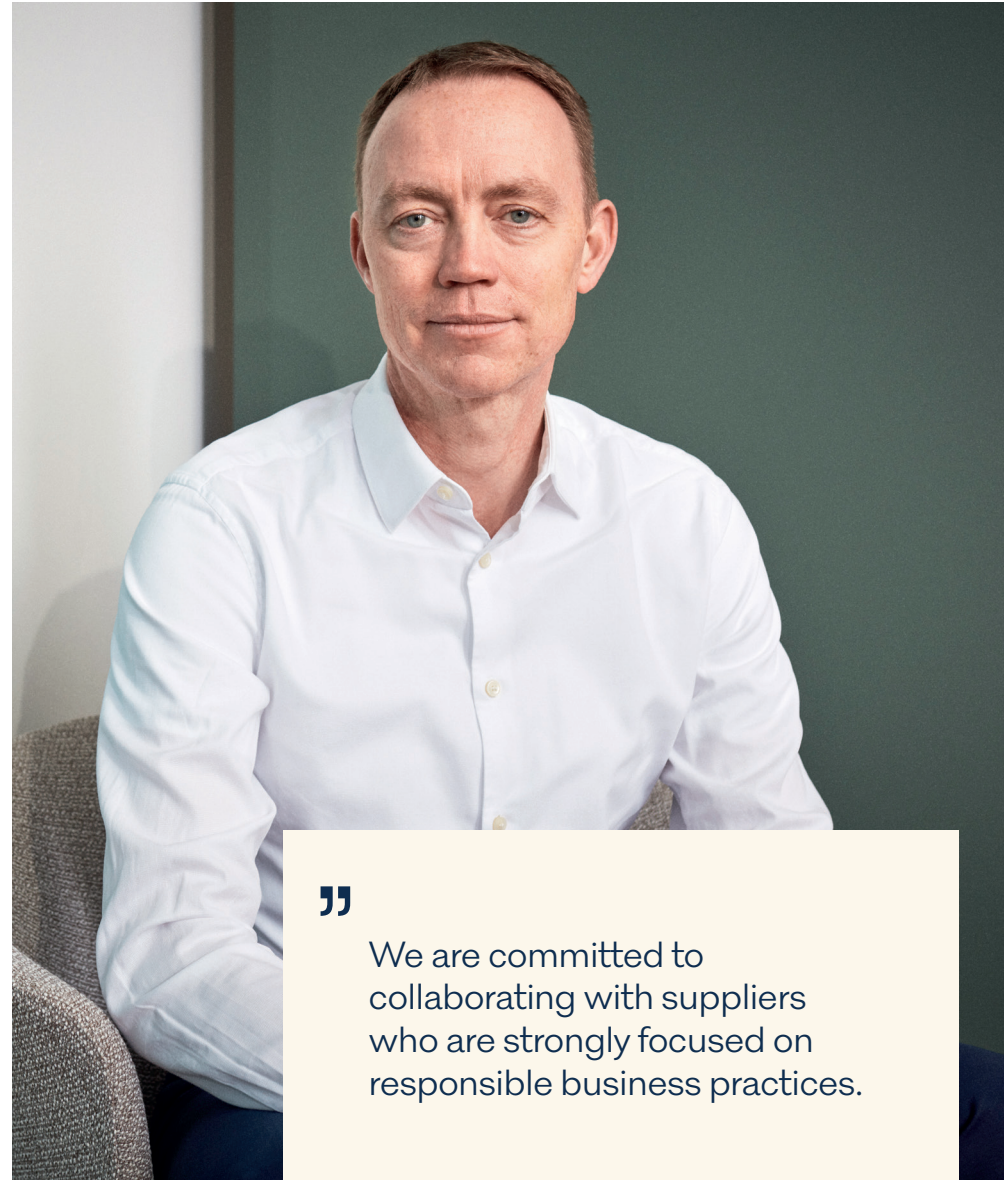
As a valued supplier to Svitzer, we are keen to establish a mutually beneficial collaboration with you. As a result, we ask that you act in accordance with this Code and extend similar standards to your supply chain partners – at any time. Please make sure that you familiarise yourself with the contents of this Code of Conduct as a representation of our shared commitment to ethical conduct, respect for human rights, environmental responsibility and compliance with applicable law and regulations no matter where you operate.

Thank you for your support and commitment to Svitzer's Code of Conduct.

Sincerely,



Kasper Friis Nilaus
Chief Executive Officer



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We are committed to collaborating with suppliers who are strongly focused on responsible business practices.

Our values

At Svitzer, we operate our business based on a set of five core values. For decades, these values have remained guiding principles, governing the development of Svitzer for a long time. In today's

world of rapidly evolving economic and market conditions, the values remain key to ensuring that we grow for the future in a sustainable way.



Constant Care Take care of today, actively prepare for tomorrow



Humbleness Listen, learn, share and give space to others



Uprightness Our word is our bond



Our Employees The right environment for the right people



Our Name The sum of our values: Passionately striving together



Introduction

Svitzer's Supplier Code of Conduct (hereinafter referred to as the 'Code') sets out minimum requirements for our suppliers (hereinafter referred to as 'suppliers') to operate in accordance with responsible business principles detailed in this Code and in full compliance with all applicable laws and regulations.

Where the standards in this Code differ from local and national laws as well as international standards, we expect our suppliers to apply the stricter standard and be able to demonstrate compliance with all international legislation that applies to your business operation. In the event of standards in this Code conflicting with local and national laws as well as international standards, we encourage our suppliers to address such conflicts to us in order to jointly establish the most appropriate course of action.

This Code reflects our commitment to the United Nations Global Compact (UNGC) and our respect for universally recognised normative standards. This includes the United Nations Universal Declaration of Human Rights, ISO Standards on Occupational Health & Safety,

Environmental Management and the core labour conventions of the International Labour Organisation (ILO).

In the case of business relationships such as non-controlled joint ventures, alliance partners, vessel-sharing partners etc., we engage with such business partners to influence the implementation of principles and standards of this Code, or similar internationally recognised standards, to mitigate any sustainability risks within our supply chains.

Our suppliers are also required to implement the principles and standards of this Code, or similar internationally recognised standards, with their own business partners. This includes suppliers, contractors and joint venture partners. More guidance on the successful implementation of principles and standards mentioned in this Code and other relevant resources are available on our website:

→ [Supplier Information Centre – Svitzer](#)



Implementation

Our suppliers are required to acknowledge and commit to the adherence of the responsible business principles of the Code. We assess our suppliers' compliance with the Code through a combination of audits, self-assessments and documentation reviews through our Sustainable Procurement Programme.

Suppliers should address any gaps in the implementation of this Code by establishing and implementing a time-bound improvement plan in consultation with Svitzer. Periodic reviews and follow-up audits as per our internal risk procedures are conducted to monitor the compliance levels.

We expect and encourage our suppliers to develop and implement relevant management systems, appropriate for a company of their size and industry to ensure compliance with applicable laws and regulations and the requirements of the Code.

The underlying objective of this Code is to establish a basis for the positive development of sustainable procurement practices through regular dialogues and ongoing working relationships. However, in the event of severe violations of the Code, we reserve the right to take actions, including the potential termination of our cooperation.



Business ethics

We expect our suppliers to conduct their business by adopting the highest standards of ethical behaviour. Svitzer has a zero-tolerance approach towards any kind of bribery and corruption, regardless of local laws and practices.

Bribe

A bribe is a direct and/or indirect payment, offer or promise to pay or give anything of value to cause an official not to perform their duty, or to do what they should not do, e.g., providing a service which the payor is not entitled to receive.

Facilitation payment

A facilitation payment is a personal payment or amenity to a low-level official to cause that person to perform a routine service which the payor is entitled to receive, but which the official refuses to provide without payment.

Employee

An employee is an individual who works part time or full time under an open or fixed-term contract of employment that may be oral or written.

Suppliers should:

- avoid participating in or knowingly benefitting from any kind of corruption, extortion or bribery
- adhere to applicable anti-corruption and anti-bribery laws, directives and regulations that govern operations in the countries in which they operate
- avoid facilitation payments and work towards eliminating them
- adhere to anti-trust and other competition laws
- disclose any potential or actual conflict of interest to Svitzer
- adhere to national and international foreign trade control laws pertaining to business transactions with countries, companies and persons (sanctions) and the transfer of goods and services, software or technology between countries (export controls)
- exercise quality and sustainability due diligence when designing, manufacturing and testing products
- adhere to data privacy laws and comply with contractual requirements on confidentiality and information security
- inform Svitzer immediately of any data or security breach which affects or has the potential to affect Svitzer or Svitzer-affiliated entities.

Reporting concerns

We expect our suppliers to have a reporting system in place to ensure that employees can voice any concerns anonymously and without any fear of reprisals on any aspect of this Code. All concerns should be investigated in a fair and timely manner.

In addition to our suppliers, we welcome concerns from anyone else within or outside of Svitzer if they suspect or know of any potential or actual violations of this Code. We do not tolerate retaliation against persons reporting their concerns in good faith.

You can report concerns through the channel you are most comfortable with. This includes Svitzer representatives, any member of management or through the Svitzer Whistleblower system.

Whistleblower system

Our Whistleblower system (faceup) is hosted on a secure, external website, available 24 hours a day, 7 days a week and in multiple languages. You can also raise your concerns by calling (+45) 80 83 08 85. You can report anonymously, and all cases are kept confidential, whether you provide your name or not.

→ [Visit our Whistleblower system here](#)



Health and safety

We expect our suppliers to provide a safe, secure and healthy working environment for all of their workforce.

Suppliers should:

- develop and implement effective health and safety management systems with worker participation in the safety committees
- ensure that safety management systems support the identification of risks, measuring and monitoring performance, and driving continuous improvements to mitigate or minimise health and safety risks emanating from its operations
- ensure compliance with applicable laws, regulations and customer requirements
- ensure the protection of their workforce by providing basic personal protective equipment appropriate to the nature of the work and relevant training on health and safety systems
- empower workers to report unsafe practices without the fear of reprisal
- commit to proactively undertake safety initiatives to protect people and assets from harm and damage
- inform Svitzer of any malpractice or incidents occurring on or around our business operations.



Environment

We expect our suppliers to integrate environmental considerations in their operations and to strive for continuous improvements to mitigate or minimise any adverse impacts on the environment.

Suppliers should:

- have a written environmental policy or statement appropriate for the size of their operation
- comply with all relevant local and national environmental laws as well as international standards and obtain and maintain all the necessary environmental permits, approvals and registrations
- develop and implement effective environmental management systems that support the identification of risks, measuring and monitoring performance, and driving continuous improvements to mitigate or minimise environmental impacts emanating from its operations
- develop a precautionary principal approach and promote environmentally friendly technologies and processes in their own operations and across the supply chain
- commit to proactively undertake initiatives to protect the environment from harm and degradation in relation to their operations
- evaluate the impacts of their business activities on the environment, ecosystems and biodiversity and strive to reduce these impacts
- include environmental considerations such as resource efficiency and waste reduction when contracting with sub-suppliers and third parties.



Working conditions and employment practices

We are committed to creating and sustaining a working environment where workers are treated with dignity and respect. We expect our suppliers to also adopt and enforce similar workplace practices. Where local laws dictate any additional requirements, those will be applicable along with the requirements mentioned below. Suppliers should respect and adhere to internationally recognised labour and human rights standards as defined in the principles of the United Nations Global Compact and the International Labour Organisation (ILO).

Suppliers should:

- respect all applicable laws, regulations and international standards related to labour practices and the protection of human rights
- adhere to relevant national laws, industry standards and international standards for paid sick leave, paid annual leave and paid parental leave. Where local/national law and international human rights standards differ, suppliers shall follow the higher standard
- establish fair disciplinary, grievance and termination procedures
- not employ workers below the age of 15 years or below the age of 16 years for work at sea or the locally applicable minimum legal age, whichever is more stringent
- ensure that employees, including trainees, under the age of 18 years do not undertake nightshift work, work overtime or carry out work that is hazardous or harmful to their physical or mental development and health
- not use or benefit from any kind of forced or involuntary labour and prohibit the use of recruitment fees, deposits, including by recruitment agencies, or other practices that may prevent employees from freely ending their employment
- take extra precautions to respect the rights and wellbeing of migrant workers whose rights may be at risk or who may lack access to basic public services
- respect the rights of their employees to associate freely, join or not join trade unions and/or workers' councils and engage in collective bargaining in accordance with national laws and international conventions
- ensure that employment terms are clearly understood by workers and are explained verbally or provided in a written contract in a language they understand, as per local regulations and aligned to the provisions of this Code as a minimum
- comply with appropriate working hour requirements including overtime, breaks and rest periods – as established by national law, relevant collective agreements and international standards
- adhere to relevant national laws, industry standards and international standards relating to minimum wages, overtime wages and legally mandated benefits
- ensure that security guards operating at suppliers' premises act in accordance with universally recognised human rights standards including guidelines on the use of force
- ensure that the collection and further processing of employees' personal data is done in compliance with the applicable data privacy legislation and best practices.

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