

Code of Conduct



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Introduction

From operating a single feeder-route more than forty years ago between Sweden, Denmark, and Germany, Unifeeder A/S (hereafter "Unifeeder") has now become a leading global, multi-regional Feeder, Multimodal, and NVOCC service operator, serving hundreds of ports across the globe. We strive to enable trade to generate prosperity globally and contribute positively to the economies and communities where we operate, ensuring long-term benefits for the world we live in.

Purpose

This Code of Conduct (the "Code"), as well as its supporting document¹ and actions, outlines the commitments we make to conduct business in an ethical, legal, and socially responsible manner. Unifeeder acknowledges the crucial role that our external stakeholders play in enabling us to live up to our commitments and believes that the implementation of the Code will create value for all parties, and is a vital step in establishing sustainable relationships around the world. It also establishes the expectations that we have for our external stakeholders. We require all our external stakeholders to adhere to these standards, but we encourage them to go beyond these requirements and strive for continuous improvement.

Scope

The Code applies to all external stakeholders (including their employees and their supply chains) who conduct business activities with Unifeeder.

Policy

1. General Requirements

Unifeeder shall only engage with external stakeholders who commit to adopting and complying with the Code. Unifeeder will monitor the external stakeholders' performance and take appropriate action in case of non-compliance or violation of the Code.

We expect our external stakeholders to:

- comply with the Code;
- comply with all applicable laws and regulations;
- ensure that their supply chains are in compliance with the Code and any applicable customer code(s) of conduct;
- ensure awareness and compliance of the Code with its employees;
- adopt or establish a management system designed to ensure compliance with the Code and applicable laws and regulations (where applicable);
- disclose any relationship that might represent an actual, potential, or perceived conflict of interest; and

¹ Code of Ethics

- operate in a sustainable and responsible manner with clearly defined supply chain goals and objectives.

2. Human Rights and Fair Labor Practices

All of Unifeeder's external stakeholders must conduct their employment practices in full compliance with all applicable laws and regulations.

We do not tolerate child or forced labor, nor do we allow it at any of our subsidiaries or business partners. At the same time, we encourage to establish a policy to allow young workers to carry out work as long as this is not hazardous. The Code also takes into account the UN Global Compact's (UNGC) ten principles, the Universal Declaration of Human Rights, the International Labor Organization's eight core work standards, the Guiding Principles on Business and Human Rights, the UN "Protect, Respect and Remedy" Framework, the IFC Performance Standards on Environment & Social Sustainability, and the United Nations Sustainable Development Goals (SDGs).

Unifeeder values and upholds the human rights of our employees, our supply chain, and the wider community. We also annually release a statement on Anti-slavery to ensure transparency and accountability.

We expect our external stakeholders to:

- comply with the applicable modern slavery laws;
- comply with all applicable regulations with regard to child labor, and prohibit the use of child labor and ensure that legal employees under the age of 18 only performs non-hazardous work as defined in the UNGC, principle 5;
- comply with all applicable labor regulations with regard to working hours, remuneration, minimum wage as per local laws and regulations, and employment contracts;
- respect and uphold human rights and to take proactive measures to avoid infringing on the rights of others and strive to make positive contributions to support human rights, going beyond basic requirements;
- not use or permit the use of corporal punishment or other forms of mental or physical coercion, nor execute threats of such treatment; and
- ensure collection and further processing of employees' personal data are done in compliance with the applicable data privacy laws and regulations.

3. Inclusion and Diversity

As part of our commitment, we have a zero-tolerance policy for any form of discrimination or unfair treatment. External stakeholders are expected to promote inclusivity and diversity and foster a culture that values and welcomes differences in perspectives and backgrounds.

We expect our external stakeholders to:

- ensure all types of discrimination prevention (i.e. Sexual harassment, racial, age, physical, psychological etc.) and effectively investigate and report any potential cases;
- embrace diversity, encouraging personal development and providing employees with the tools to drive change; and

- provide a non-discriminatory workplace for all employees (including hiring, remuneration, promotion and disciplinary action) and pro-actively encourage opportunities for professional development.

4. Freedom of Association and the Right to Collective Bargaining

Unifeeder believe in the fundamental rights of all workers to form associations and engage in collective bargaining and expect the same of our external stakeholders. We are committed to creating an environment that encourages open communication, constructive dialogue, and mutual respect between management and labor.

We expect our external stakeholders to:

- recognize and respect the right of employees to join or form labor unions, or to refrain from doing so, without fear of discrimination, retaliation, or any other form of interference;
- understand that collective bargaining is a form of social dialogue that involves voluntary negotiations between autonomous parties acting in good faith; and
- ensure that that company policies, procedures and practices do not discriminate against individuals because of their views on trade unions or for their trade union activities.

5. Sustainability, Environment, and Climate Protection

Unifeeder is strongly committed to sustainable and responsible business practices. Our corporate philosophy emphasizes the protection of the environment and the promotion of sustainable development that benefits employees, customers, local communities, the environment, and future generations.

We expect our external stakeholders to:

- minimize their negative impact on climate change, pollution, biodiversity and water scarcity in order to protect the livelihoods of present and future generations;
- reduce resource consumption, consider sustainability to minimize environmental impact;
- engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate; and
- encourage other stakeholders / service providers in their decarbonization efforts.

6. Anti-bribery and Facilitation Payments

Unifeeder is committed to prevent and prohibit corruption in all its forms, including extortion and bribery and proactively participates in global and local maritime networks with the aim to eliminate Bribery on a global scale. The Code also takes into account the principles presented in the United Nation convention against corruption.

We expect our external stakeholders to:

- refrain from giving, taking, offering, proposing, requesting, arranging, allowing, ignoring or being willfully blind to bribes and;
- refrain from providing facilitation payments of any kind;

- ensure that the highest standards of ethical conduct are maintained in all its business dealings;
- assist and to remain vigilant in preventing, detecting and reporting bribery and facilitation payments;
- have adequate procedures in place to exclude bribery and facilitation payments from their business;
- not engage in corruption, extortion, or embezzlement in any form;
- notify Unifeeder if any member of staff has a direct or indirect interest in the external stakeholder;
- not offer or accept bribes or other means to obtain an undue or improper advantage; and
- not employ or otherwise make payments to any Unifeeder employee during the course of any transaction between the external stakeholder and Unifeeder.

7. Gifts and Hospitality

Unifeeder only allows permissible gifts, including hospitality, presents, or other offerings, if they are in line with customary business practices and cultural norms. However, these gifts must not have any influence over entrepreneurial decision-making.

We expect our external stakeholders not to offer any gifts or hospitality that:

- are an improper benefit or advantage in exchange for the furnishing or receipt of any financial benefit or other advantage;
- are in cash or cash equivalent (gift cards etc);
- are luxurious, lavish or immodest;
- are valued in excess of USD 200;
- are part of a quid pro quo (“if you give me this, i’ll give you that”); and
- are directly or indirectly linked to a government official or authority without the prior approval.

8. Anti-fraud

Unifeeder has a zero-tolerance policy and is dedicated to detecting, preventing and persecuting any instances of fraud.

We expect our external stakeholders to:

- have continuous awareness on all levels to prevent and detect instances of fraud;
- be aware of the risks associated with occupational fraud, how to identify them and more importantly how to stop them;
- provide employees with safe communication channels to report suspected fraud; and
- prevent deceptive, misleading or dishonest conduct and always act with the highest levels of integrity and ethics when conducting business with Unifeeder.

9. Money Laundering, Sanctions, Trade Embargoes and Tax Evasion

Unifeeder is dedicated to preventing the use of its operations for money laundering purposes and adheres to the laws and regulations related to trade embargoes and sanctions. Unifeeder ensures full compliance with its tax obligations and does not engage in any activities that may lead to tax evasion.

We expect our external stakeholders to:

- comply with all applicable Anti Money Laundering, trade embargoes, sanctions laws and regulations;
- refrain from money laundering and tax evasion;
- have adequate procedures in place to prevent money laundering and tax evasion;
- carry out adequate due diligence in all transactions where there is a potential trade embargoes or sanctions risk; and
- provide documents to support Unifeeder's compliance procedures upon request.

10. Anti-trust and Fair Competitive Behavior

Unifeeder firmly believes in supporting and promoting free, impartial, and equitable competition. Unifeeder abides by all regulations related to competitive practices, which forbid any acts of anti-competitive behavior or any conduct that provides an unfair advantage.

We expect our external stakeholders to:

- comply with anti-trust and other laws regulating competition;
- refrain from agreeing/fixing prices, allocations of customers or sales territories between competitors;
- not exchange confidential market information; and
- not participate in any events such as meetings, conferences, forums, and committees that could have an anti-competitive impact.

11. Confidentiality

Unifeeder may share confidential information with external stakeholders when necessary, but it is required that the external stakeholders maintain the confidentiality of the information and do not use it for any unethical or unauthorized purposes.

We expect our external stakeholders to:

- adhere to contractual requirements on confidentiality and information security;
- keep any confidential information shared by Unifeeder secure and restrict access;
- appropriately store and process personal information and strategic information;
- acknowledge and uphold the intellectual property rights of third parties, including copyrights, patents, trademarks, licenses, and logos. All external stakeholders must ensure that they do not use any plagiarized content. External stakeholders are also required to safeguard information and transfer technology and know-how in a way that protects intellectual property rights; and
- notify and inform Unifeeder if they believe they have been given access to Unifeeder's confidential information by error and to refrain from further distribution of the information.

12. External Communications

Unifeeder has strict policies and procedures regarding external communication.

We expect our external stakeholders not to without prior consent:

- make any public announcements about its business and operations with Unifeeder, including and not limited to social media; and
- use any Unifeeder branding for marketing purposes.

13. Notification and Reporting Breaches of the Code

External stakeholders who suspects violations of the Code, please do not hesitate to inform the Unifeeder Compliance Officer at compliance@unifeeder.com or use our external and 100% anonymous whistleblowing hotline at www.dpworld.ethicspoint.com.

We expect our external stakeholders to:

- notify Unifeeder if they suspect, know or are concerned that the Code is being breached;
- provide an anonymous complaint mechanism for their workers to report workplace grievances in accordance with local laws and regulations;
- establish appropriate measures for whistleblowing; and
- ensure that these programs protect whistleblowers confidentiality and prohibit any form of retaliation.

14. Response and Actions to breaches of the Code

In the event of actual or potential violation of the Code, Unifeeder reserves the right to take the following actions but not limited to:

- conduct an investigation into the breach, using internal or external resources as deemed appropriate;
- demand that the external stakeholder documents its compliance with the Code following an investigation; and
- terminate any contract between Unifeeder and an external stakeholder where a material and unremedied breach of the Code has occurred.

