

ALL THE WAY

A.P. MOLLER - MAERSK

SUPPLIER CODE OF CONDUCT

Responsible
way of doing
business



MAERSK

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Message from the CEO

Dear valued suppliers,

At A.P. Moller - Maersk, our deeply rooted values drive the way we do business and we live by them each day. These values reflect our commitment to sustainable development and guide us in conducting our business in an ethical and upright manner.

Our suppliers play a vital role in the way we conduct our business and deliver value to our stakeholders. As responsible corporate citizens, we endeavour to work with suppliers who share a similar commitment to responsible business practices. Through this Supplier Code of Conduct, we communicate the minimum requirements that we expect our suppliers to follow while conducting business in an ethical, social and environmentally responsible manner. These requirements are based on the United Nations Universal Declaration of

Human Rights, ISO standards on HSE and the core labour conventions of the International Labour Organisation (ILO).

We require our suppliers to commit and act in accordance with the requirements under this Code and extend similar standards to their supply chain partners. Our procurement practices are designed to work collaboratively with our suppliers through a continuous improvement approach and support them to meet our requirements. By working together with our suppliers, we can provide sustainable solutions to our customers and embed sustainability in supply chains as well as the wider transport and logistics industry.

As a valued supplier of A.P. Moller - Maersk, I count on your commitment and support to continuously adopt and promote responsible business practices. I also encourage you to go beyond compliance and strive for higher standards of sustainability.

Sincerely,



Søren Skou

CEO of A.P. Moller - Maersk

"Our suppliers play a vital role in the way we conduct our business and deliver value to our stakeholders."

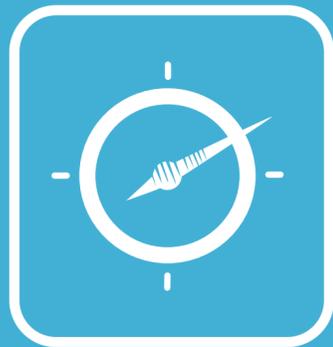


Our Maersk Values

At A.P. Moller - Maersk (Maersk), we have a distinctive set of 5 Core Values which drive the way we do business.

The Values were ingrained into our operations by our founders and have remained guiding principles, governing the development of Maersk for over a century.

In today's world of rapidly evolving economic and market conditions, the Values interplay with present time and remain key to ensuring we grow for the future in a sustainable way.



CONSTANT CARE

Take care of today, actively prepare for tomorrow.



HUMBLENESS

Listen, learn, share, give space to others.



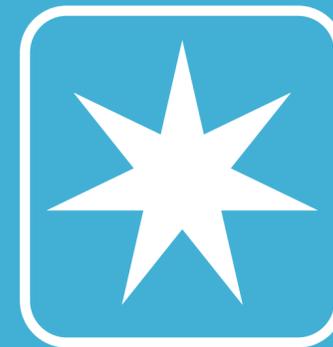
UPRIGHTNESS

Our word is our bond.



OUR EMPLOYEES

The right environment for the right people.



OUR NAME

Sum of how we live the Values and how we are perceived.

Introduction

The A.P. Moller - Maersk Supplier Code of Conduct (hereinafter referred to as 'Code') sets out minimum requirements for our direct suppliers and select sub-suppliers as decided by us (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. 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 such as the United Nations Universal Declaration of Human Rights, ISO standards on HSE 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 endeavour to engage with such business partners to influence the implementation of principles and standards of this Code or similar internationally recognised standards towards mitigating sustainability risks in supply chains.

Our suppliers are also required to implement the principles and standards of this Code or similar internationally recognised standards to their own business partners, including suppliers, contractors and joint venture partners.

More guidance on successful implementation of principles and standards mentioned in this Code and other relevant resources are available on our website <https://www.maersk.com/procurement/responsible-procurement>





A.P. MOLLER - MAERSK SUPPLIER CODE OF CONDUCT

Implementation

Our suppliers are required to acknowledge and commit to the adherence of 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 Responsible 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 Maersk. 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 positive development of responsible procurement practices through regular dialogues and ongoing working relationships. However, in the incident of severe violations of the Code, we reserve the right to take actions including and up to termination of contracts.



Reporting concerns

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

We also welcome concerns from anyone within or outside of Maersk if they suspect or know of any potential or actual violations of this Code. We do not tolerate retaliation against persons making reports in good faith.

You can report concerns through the channel you are most comfortable with, such as Maersk representatives or relationship partners, any member of management, or through the Maersk Whistleblower system. The Whistleblower system is administered by an independent company (NAVEX Global) and is available 24 hours a day, 7 days a week. It can accommodate calls in more than 75 languages and offers the ability to submit a report anonymously.

Reporting a concern online – please visit www.maersk.ethicspoint.com.

Reporting a concern by phone – please contact the international phone number at +1 866 307 5672 (i. e. available from most countries, charges may apply) or refer to www.maersk.ethicspoint.com for toll free numbers for your country.



A.P. MOLLER - MAERSK

Supplier Code of Conduct

- Business ethics
- Health and safety
- Environment
- Working conditions and employment practices



Business ethics

We require our suppliers to conduct their business by adopting the highest standards of ethical behaviour. Suppliers should:

- avoid participation in or knowingly benefit 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 it;
- adhere to anti-trust and other competition laws;
- disclose any potential or actual conflict of interest to Maersk;
- 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 to contractual requirements on confidentiality and information security.



Health and safety

We require our suppliers to provide a safe, secure and healthy working environment for all of their workforce. Suppliers should:

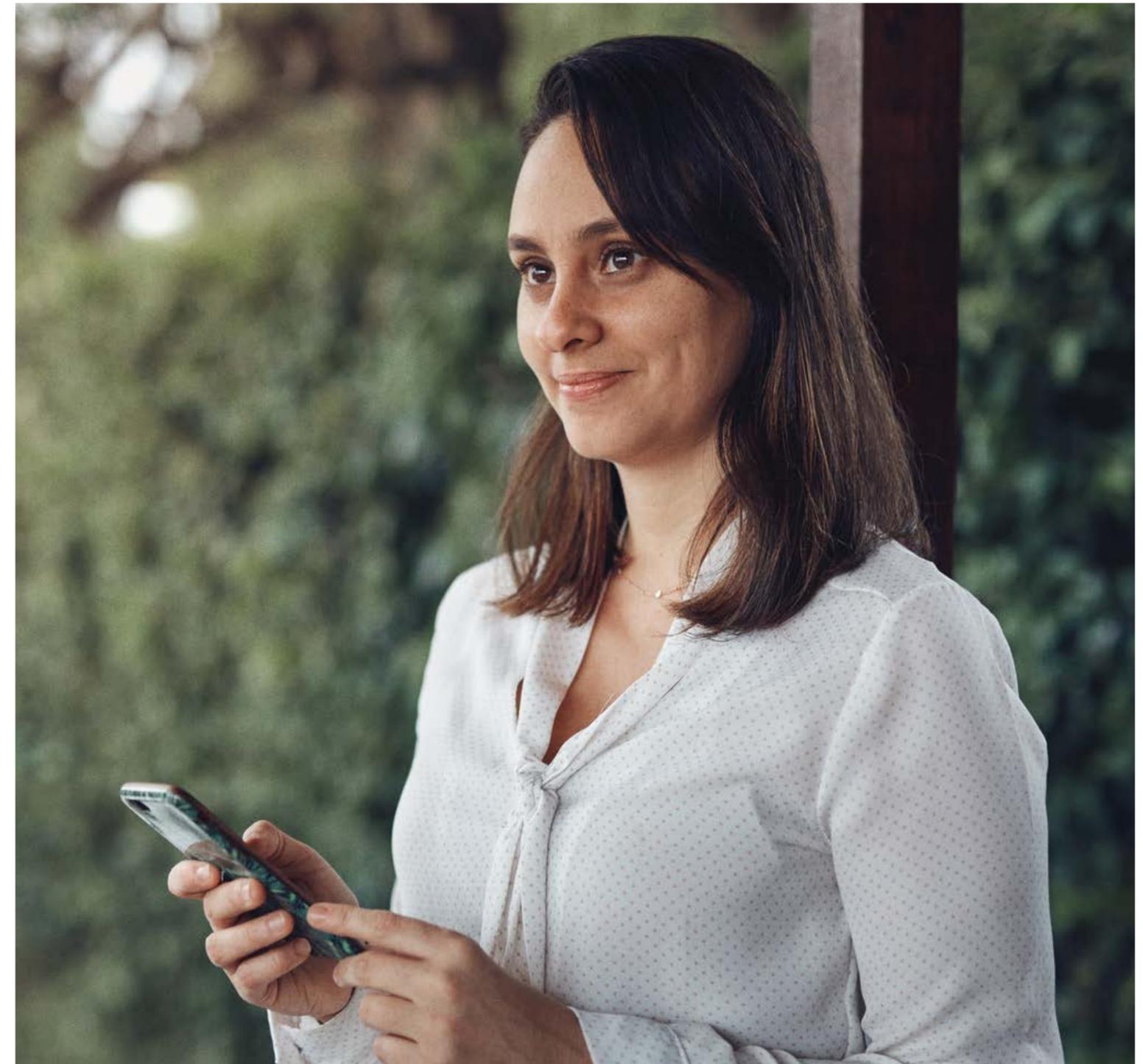
- develop and implement effective health and safety management systems with worker participation in the safety committees;
- ensure that safety management systems support identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimise health and safety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



Environment

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

- comply with all relevant local and national environmental laws as well as international standards, obtain and maintain all the necessary environmental permits, approvals and registrations;
- develop and implement effective environmental management systems that support identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimise environmental impacts emanating from its operations;
- develop a precautionary principle 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.



Working conditions & employment practices

We are committed to creating and sustaining a working environment where workers are treated with dignity and respect. We require 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**. Suppliers should:

- respect all applicable laws, regulations and international standards related to labour practices and protection of human rights;
- ensure equal treatment and refrain from discrimination of any form, including on grounds that are prohibited in national laws and international standards;
- commit to a workplace free of harassment and abuse, and not use, or permit the use of, corporal punishment or other forms of mental or physical coercion, sexual harassment or abuse, nor execute threats of such treatment;



- establish fair disciplinary, grievance and termination procedures;
- not employ workers below the age of 15 years or below the age of 16 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 do not undertake night-shift work or work overtime or carry out work that is hazardous or harmful to their physical or mental development;
- not use or benefit from any kind of forced or involuntary labour and prohibit the use of recruitments 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 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;
- adhere to relevant national laws, industry standards and international standards for paid sick leave, paid annual leave and paid parental leave;
- 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 collection and further processing of employees' personal data are done in compliance with the applicable data privacy legislation and best practices.



Glossary

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 his/her duty, or to do what he/she should not do, e.g. providing a service the payor is not entitled to receive.

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.

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 the payor is entitled to receive, but which the official refuses to provide without payment.

International standards: Maersk is a signatory to the United Nations Global Compact. References to *international standards* in this document, should primarily be interpreted as referring to the ten principles of the United Nations Global Compact.

Precautionary principle: When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.

Supplier: An entity, organisation or individual providing goods or services, or acting or sourcing on behalf of A.P. Moller - Maersk (including any controlled joint ventures and associated companies) under a contract or otherwise, or as an agent, contractor or distributor.

Worker: An individual performing work at the employer's direction, instruction or request, whether under a contract of employment (implied, oral or in writing) or otherwise, or who is deemed to be a worker by the legislation.

Workforce: total number of people employed directly or indirectly by a company or an organisation.





ALL THE WAY

