

	Policy Booklet	Company's Policies
003 Code of Conduct and Business Ethics Policy		

Code of Conduct and Business Ethics Policy

The Company conducts all activities with honesty, fairness, and respect for people and the environment.

Every employee – ashore and at sea – has a duty to uphold the highest standards of integrity and professionalism, ensuring that our actions reflect the Company's commitment to safety, compliance, crew welfare, environmental protection and human dignity.

The Company does not tolerate bribery, corruption, discrimination, harassment, retaliation, unsafe acts or any conduct that could compromise its ethical, legal, or social responsibilities.

Guiding Principles

1. Integrity in Business Dealings

- All commercial relationships shall be founded on transparent, fair, and legitimate criteria.
- Employees shall not solicit or accept gifts, hospitality or favors that could influence – or appear to influence – business judgment.
- The giving or receiving of cash or cash equivalents is **strictly prohibited**.
- Any hospitality or promotional expense must be:
 - a) Moderate in value;
 - b) Infrequent;
 - c) Appropriate to the occasion; and
 - d) Fully recorded and approved by line management.

2. Compliance and Transparency

- The Company complies with all applicable laws, IMO conventions, flag and port-state requirements and anti-bribery regulations.
- Records and reports must be truthful, accurate and complete. Misrepresentation or falsification is strictly prohibited.
- Employees shall cooperate fully with authorities, auditors and class/flag inspectors. Obstruction or interference constitutes gross misconduct.

3. Confidentiality and Privacy

- Employees shall protect the confidentiality of all Company information, including proprietary or non-public data related to the Company's business, financials, prospects, transactions, and third-party information, during and after employment.
- Employees in possession of material, non-public information are prohibited from trading the Company's securities, and shall not use, disclose, or communicate such information for personal gain, including for family members.
- Personal information about clients, suppliers, employees, or potential customers must not be disclosed unless authorized or required during the course of employment.
- The Company collects, processes, stores, and disposes of personal data of all employees and third parties lawfully, fairly, and in accordance with applicable data protection laws.

4. Respect, Diversity, and Fair Treatment

- Every individual shall be treated with dignity, fairness and respect irrespective of gender, nationality, religion, rank, or any other characteristic protected by law.
- Bullying, harassment, discrimination, or retaliation against any person – particularly those raising safety, welfare or ethical concerns – will not be tolerated.
- The Company promotes inclusion and provides equal opportunities for all employees —both ashore and at sea.

5. Human Rights and Modern Slavery

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- The Company is committed to upholding fundamental human rights and has zero tolerance for modern slavery, forced or compulsory labor, human trafficking, or child labor across all operations, value chains, and supply chains.
 - Effective due diligence and control mechanisms ensure that violations of human rights do not occur within the company's business, its clients, or suppliers.
 - Employees must understand and act in accordance with the Company's Modern Slavery and Human Rights Policy and report any concerns or suspected breaches.
6. **Safety, Environmental, and Fatality-Prevention Responsibility**
- Ethical conduct includes a personal obligation to prevent harm to people, property and the environment.
 - Leaders and supervisors are accountable for embedding the Fatality Prevention Principles and ensuring that safety is never compromised for cost or schedule.
 - Employees shall immediately use the Stop Work Authority if unsafe or unethical conditions are observed, without fear of reprisal.
7. **Prohibition of Unethical Incentives**
- No employee or crew member shall participate in or benefit from, any bonus or incentive scheme that could encourage the circumvention of safety, maintenance, or environmental standards.
8. **Whistleblowing and Non-Retaliation**
- Any employee may report, in good faith, concerns about misconduct, breaches of law or unsafe practices through the confidential reporting channels.
 - Retaliation against whistleblowers is a disciplinary offence.
 - Reports will be investigated promptly, impartially and with respect for confidentiality.
9. **Disciplinary Measures and Accountability**
- Violations of this Policy may result in disciplinary action, up to and including dismissal and where applicable, civil or criminal proceedings.
 - Line management bears responsibility for promoting awareness and monitoring compliance within their area.

Responsibilities

- **Top Management:** Lead by example, communicate ethical expectations and ensure adequate resources for compliance and welfare initiatives.
- **Department Heads / Masters:** Monitor adherence to ethical standards, provide guidance and act on any breaches or concerns raised.
- **All Employees and Seafarers:** Uphold Company values, report violations and refuse to engage in or condone unethical behavior.

Top Management has approved this statement.

Date 01-09-2025	Position President	Name Mr. Bo Westergaard Jensen	Signature 
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