

Supplier Code of Conduct

Contents

Introduction	3
General	3
Scope & responsibility	3
Transparency	3
Social	4
Human & labour rights	4
Equal opportunity & diversity in employment	4
Labour brokers	4
Bullying, harassment & discrimination	5
Protection of health & safety	5
Compensation	5
Environment	6
Governance & Business Conduct	7
Financial responsibility & accurate records	7
Anti-corruption, bribes & facilitation payments	7
Fair competition	8
Counterfeit parts	8
Gifts & hospitality	8
Conflicts of interest	8
Protection of company and employee information & data	8
Compliance with our Supplier Code of Conduct	9
Questions	9
Raising concerns / Alert line	9

Introduction

General

The Supplier Code of Conduct (“SCC”) provides a framework for what Wallenius Wilhelmsen considers responsible business conduct from our suppliers including tonnage providers. The SCC, which is not exhaustive, complements the laws and cultures in the countries where our suppliers operate and addresses key expectations in the areas of human rights and labour standards, the environment, and ethical business conduct.

Wallenius Wilhelmsen suppliers must comply with all applicable international, national and local laws, rules, regulations and all relevant Wallenius Wilhelmsen policies.

Suppliers and their relevant employees are expected to be familiar with the requirements in this document. All suppliers are also expected to ensure their subcontractors are familiar with the principles of Wallenius Wilhelmsen’s SCC.

Scope & responsibility

The SCC is applicable to all suppliers, subcontractors, agents, and other business partners of Wallenius Wilhelmsen (including companies in which Wallenius Wilhelmsen has a minority stake), acting on behalf of the company, who are expected to adhere to the standards outlined in this SCC.

- Questions regarding the content or interpretation of this SCC should be directed to your procurement contact at Wallenius Wilhelmsen.
- Violations of the SCC may result in a review, corrective actions, or loss of business with Wallenius Wilhelmsen.
- Several of the topics included in this SCC are also addressed through separate policies and procedures.
- Suppliers are responsible for ensuring compliance with additional relevant company policies.

Suppliers are expected to extend these sustainability requirements and standards in their own supply chains, respectively.

Transparency

Transparency is essential for building and maintaining trust with our customers and our partners, and Wallenius Wilhelmsen may request documentation or conduct audits to verify compliance with this SCC.

Social

Human & labour rights

Wallenius Wilhelmsen supports and works in compliance with the internationally recognised UN Universal Declaration of Human Rights and the International Labour Standards (ILO Declaration on Fundamental Principles and Rights at Work).

Wallenius Wilhelmsen expects all suppliers to live up to these standards and comply with all applicable laws that recognise and respect employees' rights to freedom of association and collective bargaining.

Suppliers may not use any form of forced labour, exploitative working conditions and practices, nor children under the legal working age. A 'child' means any person under 15 years of age, unless national laws and regulations stipulate a higher mandatory school leaving or minimum working age, in which case the higher age shall apply.

Suppliers shall not engage in nor tolerate any form of modern slavery including forced or compulsory labour or human trafficking.

Equal opportunity & diversity in employment

Wallenius Wilhelmsen does not tolerate any discrimination on the basis of race, colour, religion, gender, age, nationality, sexual orientation, disability, or any status protected by law.

Suppliers must comply with all applicable laws, including regulations on working hours, protection of health, equal opportunity, compensation and benefits and human rights.

Wallenius Wilhelmsen expects our suppliers to promote gender and ethnic diversity and provide equal opportunity for employment and advancement.

Labour brokers

Suppliers who use labour brokers will ensure all labour brokers follow ethical recruitment practices, comply with all applicable laws, respect human rights, and live up to this SCC in all regards.

Prospective employees should never pay to be hired by suppliers, nor have to surrender formal documentation (such as passports) to suppliers.

Bullying, harassment & discrimination

Wallenius Wilhelmsen is committed to respecting human rights and prohibits any bullying, harassment or discrimination based on age, nationality, gender, race, sexual orientation, religion or colour.

Suppliers shall not discriminate in any fashion against minorities and indigenous peoples, and they should take steps to protect their employees, contractors and subcontractors from all types of harassment (including sexual harassment) in the workplace.

Protection of health & safety

At Wallenius Wilhelmsen, we believe everyone deserves a healthy and safe workplace.

Suppliers must provide a safe, clean and healthy working environment for their employees, and at a minimum, be in full compliance with all standards mandated by law.

Compensation

Wallenius Wilhelmsen expects all suppliers to respect local laws and regulations relating to working hours. Suppliers must provide reasonable pay for services performed and never lower than the minimum wage in the local job market.

Suppliers must use non-discriminatory payment practices and strive to ensure equal pay for work of equal value.



Environment

Wallenius Wilhelmsen is dedicated to developing and providing sustainable logistics, now and in the future. By focusing on our environmental performance, we are creating more sustainable business solutions and economic value for our employees, customers, shareholders and suppliers. Our suppliers play a critical role in our ability to deliver more sustainable logistics solutions to our customers.

Suppliers shall strive to continuously improve their environmental performance by reducing GHG and non-GHG emissions and lowering their consumption of energy, water and natural resources. Suppliers should demonstrably increase use of renewable energies and minimise waste generation. Suppliers with impacts on air and water quality should adopt measures to limit these impacts.

Suppliers shall comply with all applicable environmental regulations and establish KPIs and targets to support and drive improvement in their sustainability performance.

Wallenius Wilhelmsen is committed to sustainable waste management practices, and our suppliers should be equally and demonstrably committed to reducing waste at source, recycling, properly disposing hazardous waste, and educating their employees, subcontractors and suppliers on the importance of waste reduction and proper disposal methods.

Protecting the planet's biodiversity is critical to preserving a healthy ecosystem that can sustain life. Our suppliers shall share our commitment to healthy, stable marine ecosystems by managing their impacts on biodiversity and, wherever possible, reducing their impacts on the marine environment.

We also encourage suppliers to collaborate and adopt innovations to reduce the environmental impacts of their operations.

Governance & Business Conduct

Financial responsibility & accurate records

Suppliers shall record and report financial information timely, completely, and accurately in their dealings, while respecting their confidentiality obligations. All financial records must be prepared in accordance with applicable laws, regulations, and relevant accounting standards.

Anti-corruption, bribes & facilitation payments

Wallenius Wilhelmsen is committed to preventing the occurrence of bribery in all activities under our effective control. Any offering or accepting of bribes in any form to any person, whether private or public, direct or indirect, or through third parties, is prohibited.

Wallenius Wilhelmsen recognises that facilitation payments are bribes, and we are committed to work to identify and eliminate them.

Suppliers shall not tolerate corruption, bribery or fraud in any form.



Fair competition

Competition and anti-trust laws promote free enterprise and prohibit behaviour that restricts fair competition. They combat illegal practices such as price fixing, allocation of customers or markets, or any abuse of a dominant market position.

Wallenius Wilhelmsen is committed to fair competition and does not tolerate violation of competition and anti-trust laws and regulations by any suppliers.

Counterfeit parts

Suppliers shall never use Counterfeit Products. Suppliers shall use commercially reasonable efforts to detect and avoid providing Counterfeit Products. If an item delivered under a Statement of Work is a Counterfeit Product, Supplier shall, at its expense, promptly notify their contact at Walwil, and replace such Counterfeit parts with genuine items conforming to the requirements of the applicable Statement of Work. Suppliers shall apply this requirement to their subcontractors and suppliers.

Gifts & hospitality

Suppliers shall not allow gifts and hospitality to unduly influence their objectivity and independence, or cause others to perceive an influence. Suppliers shall not offer or receive gifts or hospitality when it could affect or be perceived to affect the outcome of a business transaction. Suppliers should not offer Wallenius Wilhelmsen employees gifts or hospitality.

Conflicts of interest

Suppliers shall avoid activities that create conflict between their own interests and the interests of Wallenius Wilhelmsen.

Suppliers are expected to abide by all relevant laws pertaining to anticompetitive business conduct, protection of intellectual property, data, export controls and economic sanctions.

If such a conflict is identified, it should be reported immediately to the supplier's point of contact at Wallenius Wilhelmsen for review and handling.

Protection of company and employee information & data

Suppliers will manage all Wallenius Wilhelmsen information in a secure manner. This includes preventing unauthorised disclosure of employees' personal data, and company, customer or supplier-related, sensitive information to any other person or organisation as well as copying or removing the company information in whatever form from the supplier's premises without due authorisation.

Compliance with our Supplier Code of Conduct

As a supplier and business partner to Wallenius Wilhelmsen, you will be requested to confirm that you have read and familiarised yourself and all relevant employees and subcontractors with this SCC.

Questions

If you have questions regarding the content or interpretation of this SCC, please contact your procurement manager at Wallenius Wilhelmsen.

Raising concerns / Alert line

Suppliers or their employees or subcontractors who suspect or are aware of breaches of the SCC or any other harmful behaviour should report the incident using the Wallenius Wilhelmsen Alert Line via web, email or telephone.

Details can be found at www.walleniuswilhelmsen.com/who-we-are/governance.

Handling will be confidential as far as possible and in accordance with local laws and regulations.

