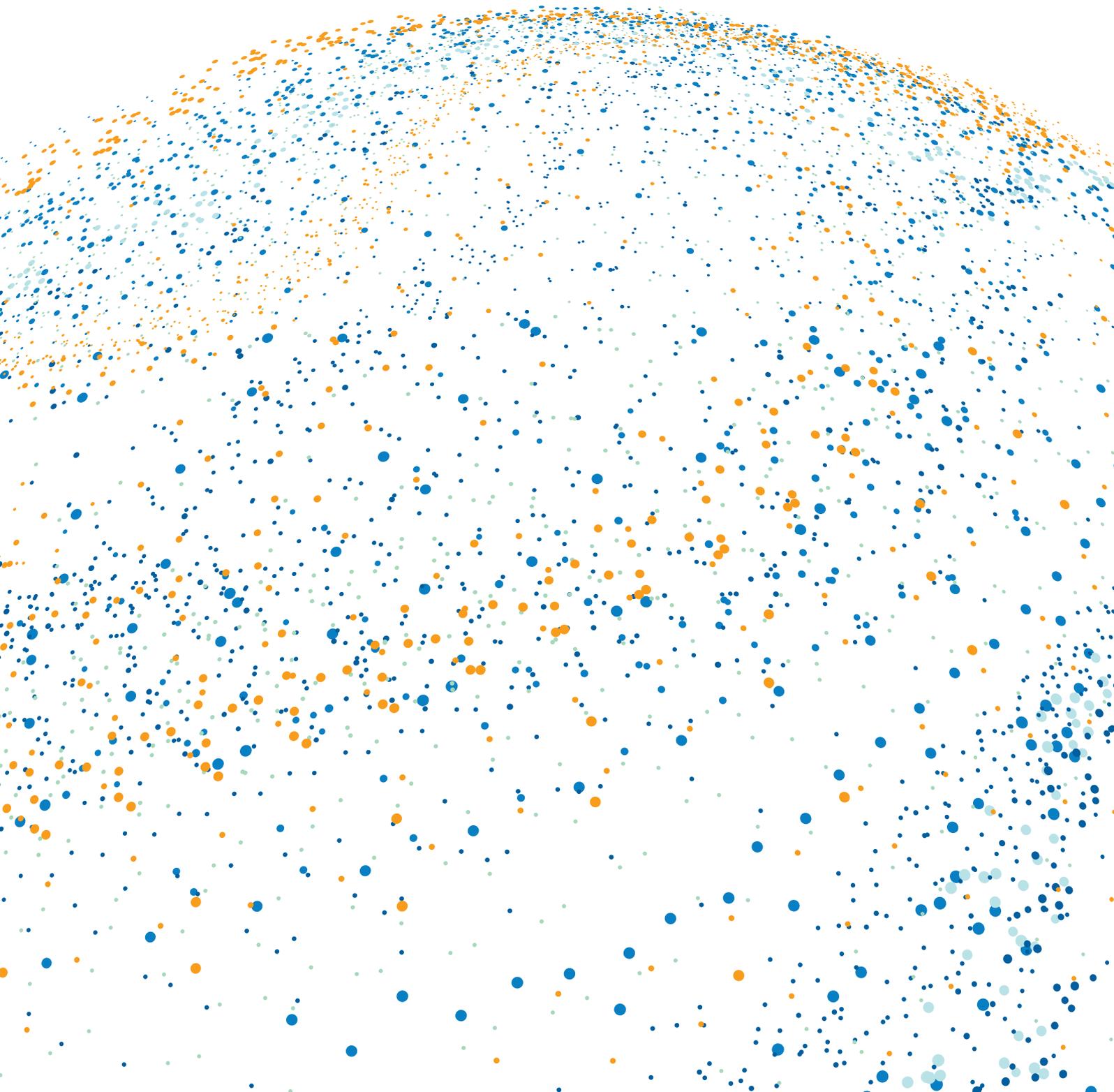


Supplier Code of Conduct



Supplier Code of conduct

Wilhelmsen is committed to conducting business in a responsible and ethical manner within our own operations and in our business relationships. Wilhelmsen has zero tolerance for all forms of corruption, modern slavery and child labor and requires commitment to responsible business practices and sustainable development from all of its suppliers.

The Supplier Code of Conduct ("SCoC") describes the standard of business ethics applicable for all suppliers in their business relationship with Wilhelmsen. Suppliers include any legal entity or person that provides products or services requested by Wilhelmsen. Suppliers shall ensure that their employees, consultants, agents, suppliers, subcontractors, and other representatives comply with the provisions of this SCoC. In case you are in doubt about the interpretation or applicability of this SCoC, seek advice from your respective business contact.

Suppliers shall report any alleged or observed breach of the SCoC in its business activities related to Wilhelmsen. In cases of breaches of the SCoC, suppliers shall take the necessary corrective actions in a timely manner at no costs to Wilhelmsen.

Suppliers shall provide relevant information and documentation upon the request from Wilhelmsen, including information regarding sub-suppliers and supply chain risks, employment conditions, etc. Records of audits undertaken of the suppliers' supply chain shall be available on request. Wilhelmsen has the right to perform inspections at the supplier and sub-supplier's premises that are necessary to verify that the SCoC is complied with.

Any breach of this SCoC by a supplier, or any such representative of the supplier, may result in Wilhelmsen terminating business activities and in serious cases civil action.

Wilhelmsen will act on non-compliance allegations brought forward appropriately and responsibly to the respective contact at Wilhelmsen or through our whistleblowing channel.

1. COMPLIANCE WITH THE LAW

Suppliers shall comply with all applicable local and international laws and regulations. If a requirement of this SCoC differs from national laws or regulations the supplier shall comply with whichever is more stringent.

2. BUSINESS ETHICS

2.1 Corruption and bribery

Wilhelmsen has a zero-tolerance policy towards corruption and bribery. The supplier shall comply with all applicable laws and regulations regarding corruption, bribery, fraud, and other forms of prohibited business practices. The supplier shall not accept, request, receive or offer any favors, gifts, or hospitality of significant value in order to retain, obtain or gain any form of business advantage. Suppliers shall have auditable procedures and standards in place that prohibit any individuals acting on their behalf from taking part in such activities.

2.2 Money laundering

Suppliers shall adhere to any applicable laws and regulations concerning anti-money laundering and take active measures to prevent their financial transactions from being exploited by others for this purpose.

2.3 Fair business conduct

Suppliers shall conduct business in accordance with antitrust laws and regulations and in a fair and ethical manner, promoting healthy competition.

2.4 Conflict of interest

Suppliers shall avoid any conflict of interest with Wilhelmsen. This includes interactions with a Wilhelmsen representative that could result in a conflict of interest with the representative's responsibility to act in the best interest of the company. Suppliers shall provide immediate notification to all affected parties if an actual or potential conflict of interest arises.

2.5 Privacy and confidentiality

Suppliers shall adhere to all applicable data privacy laws and regulations concerning the processing of personal and sensitive data. Suppliers shall implement organizational and technical measures to ensure a level of security reflecting the risks. Furthermore, suppliers shall comply with contract requirements relating to information and confidentiality, and not share confidential or business sensitive information with third parties.



2.6 Compliance with trade regulations

Suppliers shall comply with relevant sanctions regimes (including the US, UN, EU and Norway), export control regulations, and other international trade regulations. Wilhelmsen will screen potential and existing suppliers for compliance with all relevant sanctions.

3. HUMAN RIGHTS AND WORKING CONDITIONS

3.1 Protection of human and labor rights

Suppliers are expected to comply with the [Wilhelmsen Human Rights commitment](#) and our approach and standards in this area. Suppliers shall adhere to all applicable laws, international standards, and other legislation relating to the protection of human rights and labor rights. Suppliers shall have policies and practices in place to minimize human and labor rights infringements.

3.2 Working environment and employment conditions

Suppliers shall foster an inclusive and diverse environment free of any sort of harassment, bullying or discrimination whether indirect, direct, or verbal. Suppliers shall take measures to provide equal opportunities for every employee. Suppliers shall as a minimum adhere to any applicable laws concerning working conditions and compensation, and all employees must have a clear and understandable employment contract. Suppliers shall have in place appropriate grievance, disciplinary and termination procedures.

3.3 Health and safety

Suppliers shall secure the health, safety and welfare of workers and visitors and protect the public from health and safety risks in adherence with all laws and regulations applicable to its operations. Suppliers shall ensure that their workers understand the safe practices and hazards of their work and provide regular and adequate training.

3.4 Modern slavery, child or forced labor

Suppliers shall not participate in, use, or tolerate the use of child labor, forced labor or human trafficking. Child labor is defined by the International Labour Organisation (ILO) as any engagement or work of any person under the age of 15 or under the age of completion of compulsory schooling, whichever is higher. Children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety or hinder their education or vocational orientation and training. For seafarers, the Maritime Labour Convention (MLC) defines child labor as engagement or work on board a ship of any person under the age of 16.

3.5 Association and collective bargaining

Suppliers shall respect employees' rights to join unions, organize and bargain collectively.

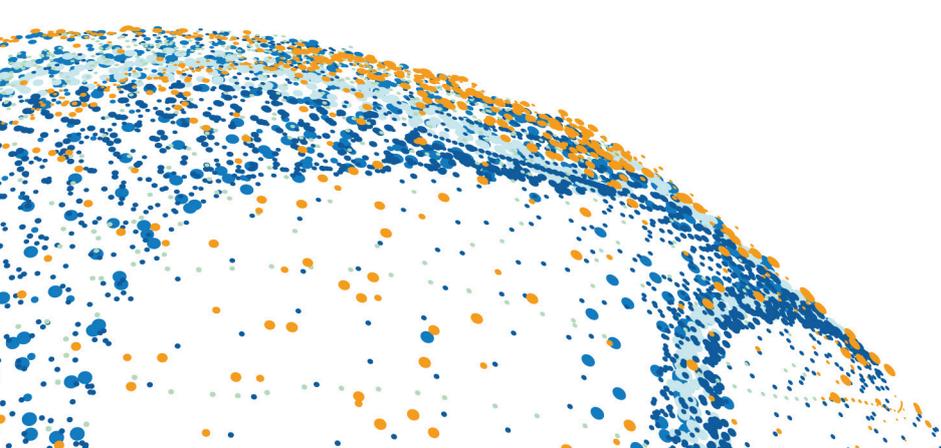
4. ENVIRONMENT

Suppliers shall take a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility.

Suppliers shall proactively participate in the protection of the environment in relation to their business operations, while complying with applicable laws and regulations, as well as obtaining all necessary environmental approval, permits and registrations.

Suppliers are expected to support Wilhelmsen's environmental commitments and implement activities to continuously reduce the environmental impact of their operations.

Thomas Wilhelmsen
Group CEO



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