

CODE OF CONDUCT

ETICAL INSTRUCTIONS TO ALL WORKING AT THE PORT OF ROENNE



We have developed a Code of Conduct for Port of Roenne A/S which we expect the Port's employees, customers and business partners – including suppliers – to adhere to. This Code of Conduct aims to ensure that ethically responsible work is performed in areas belonging to Port of Roenne A/S, while at the same time supporting the values, objectives, rules and guidelines of Port of Roenne A/S.

The Code of Conduct is part of the terms and conditions for obtaining employment and/or cooperation agreements with Port of Roenne A/S.

A few essential principles are apparent in the Code of Conduct of Port of Roenne A/S, and these principles apply to all activities taking place within the areas of Port of Roenne A/S. These principles include the following:

- Employees' personal behaviour
- Bribery and corruption
- Compliance with current competition legislation
- Relationships with business contacts
- Workplace standards
- The Port's responsibility and liability

Port of Roenne A/S has set up an internal whistleblower scheme to support these principles.

Employees' personal behaviour

Legislation, instructions and guidelines are to be complied.

Port of Roenne A/S expects anyone working within the areas of Port of Roenne A/S to pursue the following values: Professionalism, Reliability, Commitment and Cooperation. In cases where personal conduct is not governed by legislation or regulations, employees must exercise common sense and due diligence.

When in doubt, contact your line manager at Port of Roenne A/S without delay.

Every individual within the areas of Port of Roenne A/S must be treated fairly and respectfully. At Port of Roenne A/S, we have an impressive history of profound foresight, and we wish to be distinguished by our diversified and inclusive view of humanity.

Discriminatory behaviour, including harassment of every kind, is not tolerated by Port of Roenne A/S and will be dealt with whenever it is detected.

Employees of Port of Roenne A/S must not be under the influence of alcohol or narcotics during working hours, and Port of Roenne A/S strongly urges that our customers, business partners and suppliers adhere to the same procedure out of consideration for everyone's safety.



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Corruption and bribery

Port of Roenne A/S opposes any and all types of bribery and corruption, and the Port competes for commercial business on fair and equitable terms and conditions and based on the positive attributes of the Port's services. Therefore, personal remuneration, including personal gifts or free services, kickbacks or bribery between Port of Roenne A/S and customers, suppliers or civil servants is strictly forbidden, which the Port expects all parties to respect.

Compliance with competition legislation

Compliance with all competition legislation and regulations in force in Denmark and abroad is a crucial component of the corporate practice of Port of Roenne A/S, and we expect our customers, business partners and suppliers to respect this.

Relationships with business contacts

It is important to Port of Roenne A/S that the Port's internal and external partners are familiar with this Code of Conduct and that they are aware of the Port's efforts to ensure a high standard of service as well as unwavering focus on quality, safety, health and the environment in any and all work that is carried out within the areas of Port of Roenne A/S.

The customer's confidential information must be respected, and relevant data must be protected pursuant to guidelines that are applicable in this area.

Any and all customer complaints are efficiently processed and are considered as a valuable contribution to our efforts to ensure a high level of service at all times.

Forced labour, including child labour, is not permitted within the areas of Port of Roenne A/S and will be denounced in the event that it is detected.

Workplace standards

Port of Roenne A/S is continually focused on ensuring proper working conditions for employees carrying out work within the areas of Port of Roenne A/S. This is done pursuant to current legislation, guidelines, and ISO 45001:2018.

As part of this effort, employees of Port of Roenne A/S are regularly trained in health and safety matters, including IT security, and external training services are provided with regard to harbour security and safety.

Port of Roenne A/S keeps statistics and monitors damage, accidents and near-miss incidents, and the Port works proactively to prevent personal accidents within the areas of Port of Roenne A/S.

Port of Roenne A/S respects freedom of association and the right to collective bargaining, and all employees have the right to join or form a trade union.





Company responsibility and liability

As an integral part of the Port's operations, Port of Roenne A/S has incorporated the UN Sustainable Development Goals and the "10 CSR Principles" into its work, and, in this context, Port of Roenne A/S has selected four specific SDGs to focus on:

SDGs 7, 8, 9 and 12

This means, among other things, that Port of Roenne A/S is focused on ensuring that the Port's customers, suppliers and business partners assist in securing the creation of decent jobs, including by not employing minors and by paying suitable wages that are in conformity with current legislation in the area concerned.

As part of its efforts to implement the UN Sustainable Development Goals, Port of Roenne A/S has chosen to accede to the UN Global Compact in the "signatory" category, thereby respecting, supporting and working to promote global corporate responsibility.

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Port of Roenne A/S does not expect its customers, business partners or suppliers to have made the same choices, but the Port expects instructions and requests issued by Port of Roenne A/S concerning these matters to be respected by customers, business partners and suppliers of Port of Roenne A/S wherever possible.

Environmental factors and conditions are important areas of focus for Port of Roenne A/S, including in particular the scope for establishing reduction-based initiatives and the safeguarding of local environmental conditions.

Port of Roenne A/S is focused on ensuring that the Port and all its stakeholders base their work on principles of good corporate governance, and that all corporate representatives adhere to ethical principles in the conduct of their work and comply with the regulations that have been laid down within the individual areas.

Finally, Port of Roenne A/S wants the Port's social, environmental and ethical initiatives to be reflected by employees, customers, business partners, suppliers and other stakeholders, so that overall conduct within the areas of Port of Roenne A/S conforms to the principles described above.

Port of Roenne A/S

February 15th 2023

