

CODE OF CONDUCT ADP A/S



CODE OF CONDUCT

Introduction and Implementation

Associated Danish Ports A/S (hereafter referred to as “ADP”) strives to be a professional and valued business partner with high standards not only in relation to a high level of quality in its services but also in relation to business ethics.

In order to achieve its desire to be a professional and valued business partner, ADP will conduct business with professional suppliers, customers and business partners (hereafter referred to as “Business Partners”). On that basis, ADP has implemented this Code of Conduct (hereafter referred to as “the Code”). Any Business Partner to ADP must adhere to the Code.

Any Business Partner to ADP must take all reasonable measures to ensure that all its sub-suppliers or business partners are informed about the content of the Code and that they are expected to adhere to the content of the Code.

The Code will constitute a supplement to each agreement or contract agreed between the Business Partner and ADP.

Business Ethics

Being a professional and valued business partner entails not only a high level of morals and ethics but also relationships based on respect, trust and common understanding which are values that ADP always strive to fulfil, and the same is expected from any Business Partner to ADP.

ADP expects that all Business Partners exercise due diligence when performing their obligations towards ADP.

As good business relations are based on relationships of trust, it is expected from the Business Partners that any information disclosed to the Business Partners will be kept on a confidential basis and will not be disclosed to any third party. Equally, the same can be expected from ADP.

In order to maintain a high level of moral and ethics, the Business Partners must inform ADP of any potential or actual conflict of interest to ADP.

The Business Partners must never participate in or benefit from any kind of corruption or bribery and must avoid any kind of facility payment.

Legal Compliance

ADP expects that any Business Partner adhere to all applicable and relevant laws and regulations in the countries in which they operate. The Business Partners must, among others, adhere to:

- Data privacy law and regulation,
- Competition law and regulation,
- Relevant anti-corruption and anti-bribery law and regulation, and
- National and international foreign trade laws pertaining to business transactions with countries, companies, persons (sanctions), and the transfer of goods and services, software, or technology between countries (export control).

The Business Partners must apply for, obtain, and maintain any necessary licenses, permits, approvals, insurances, and other authorisations required for the performance of the obligations towards ADP.

Working Conditions

ADP is committed to a working environment where workers are treated with dignity and respect and the same is expected from its Business Partners.

The Business Partners must take responsibility for the health and safety of their employees to avoid any occupational injury and illness.

In addition to any applicable law or regulation it is expected that the Business Partners ensure equal treatment of their employees and refrain from discrimination in any form. The Business Partners must ensure that all of their employees have the right to associate freely and have the freedom of expression.

Moreover, in accordance with relevant laws and conventions the Business Partners must not employ minors or use forced labour. It is expected that the Business Partners will comply with relevant labour laws, e.g., in relation to working hours, and that the Suppliers secure a reasonable wage for their employees which, as a minimum, is equal to the wage according to local agreements or local law (as applicable).

Environment

ADP encourages its Business Partners to carefully consider the environmental impact of its business and that its Business Partners strive for improvements of their operations in order to mitigate their negative impact on the environment.

ADP will encourage the Business Partners to proactively undertake initiatives to protect the environment and to contribute to the transition into green and sustainable transition of the society to contribute to the transition into a green and sustainable society.

Any Business Partner must ensure that they comply with relevant environmental laws and international standards, and that they obtain all necessary environmental permits, approvals, and registrations.

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Whistleblowing scheme

ADP has a whistleblowing scheme where employees and others with work-related activities with ADP, including the Business Partners, can anonymously report matters falling within the scope of the whistleblowing scheme which, in general, is breaches of law and other serious matters. The whistleblowing scheme is administered by an external administrator and is governed by the Danish Act on Protection of Whistle blowers.

For further information, please see www.adp-as.dk/en/about-adp/whistleblower-scheme

ADP A/S

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