

Code of Conduct

Kim Johansen Transport Group

Introduction

Kim Johansen Transport Group (KJTG) is a company with strong values, and our behavior must not only be measured on performance, goals and results. Quality is also about how we behave towards each other and the world around us. We strive to be a credible partner for our customers and colleagues as well for our business partners and in all the EU countries we transport and operate in. Our business depends on this trust, and we always strive in the best way to run our business responsibly, ethical, and legally correct.

This Code of Conduct is the foundation of our corporate culture and sets high integrity standards for how we conduct business. Everyone in KJTG do comply with these standards. The principles below reflect the most important requirements for our well-founded organization.

The 4 principles

The principles of this Code of Conduct form the basis of our ethical culture and describe the core of our business conduct.

We follow the rules

We follow laws, rules, and our policies, and if they are in conflict, we go for the highest standard.

We take responsibility for our actions

We actively seek information, understand our responsibilities, and recognize that we have a general influence on the communities in which we operate.

We are open and honest

We are open and honest about our challenges, both internally and externally in the company.

We make our opinion known

We ask questions and we express concerns when in doubt, and we encourage others to do the same by creating a culture where we do not accept reprisals against those who express concerns in good faith.

This Code of Conduct applies to all employees and everyone who operates on behalf of KJTG, including our Executive Board and the Board of Directors. We also expect our business partners to commit to and adhere to the same high ethical standards.

How does our Code of Conduct work in KJTG

The four principles in the Code of Conduct constitute our basic obligations. Our policies and manuals contain additional requirements that must be known and followed. We have developed in accordance with our company form policies and guidelines for the use of IT, safety in the workplace and behavior, as well as an independent compliance department that constantly monitors and corrects the mentioned policies and ensures that applicable the legislation is compliant and implemented in KJTG.

The Code of Conduct contains clear requirements for our daily work and helps us when we experience problems and ethical dilemmas or emphasizes generally good behavior.

The Code of Conduct cannot get around all the dilemmas or situations we experience in our daily work. There will always be challenges in our work and uncertainty about the development of the laws and regulations that apply to us. This does not mean that we are exempt from the obligation to follow the highest possible ethical standards, but we should ask for help in making the right decision.

Employees' obligations under this Code of Conduct

As an employee of KJTG, you are expected to:

- Always act with high integrity
- To read, understand and follow the Code of Conduct, policies, and manuals
- To be open about your worries
- To participate in courses for a constant improvement of work
- Knowing when and how to seek help with colleagues and management
- To cooperate fully and openly in all tasks
- To avoid any practice that may be illegal, unethical or damage KJTG's reputation
- Constantly consider what the consequence are of your behavior is to KJTG and others

Management's obligations under this Code of Conduct

In addition to meeting the same requirements above, the management of KJTG is also expected to:

- To lead by example and regularly talk to employees about the importance of complying with laws and regulations
- To identify and anticipate compliance risks that affect teamwork
- Proactively identify measures that can alleviate compliance risks
- To ensure that the employees always are trained and prepared to deal with relevant dilemmas, and to guide them if necessary
- Creating an environment that encourages open reporting to ensure that all employees dare to share their concerns without fear of consequences
- To act as a role model for KJTG values by participating in decisions and other processes
- To promote diversity and inclusion of everybody
- To use high integrity standards as a criterion in connection with recruitment and promotions

KJTG expectations to our business partners

We only work with business partners who have satisfactory standards of responsible business conduct and ethical values, and we expect our business partners to comply with all applicable laws.

We monitor and support our business partners in carrying out their activities in accordance with KJTG's standards for responsible business conduct, and we carefully assess business opportunities to ensure that they comply with applicable international sanctions and schemes. We treat all business partners with respect and in a fair and transparent manner.

We have zero tolerance for corruption, the use of child laborers, illegal and non-ethical behavior, and the exploitation of vulnerable people.

Climate and Environment

We strive to protect the environment and help prevent climate change. We comply with local legislation and the internationally recognized environmental standards, and we do our part to minimize resource consumption, including energy, water and raw materials.

We take the climate and environmental impact into account when purchasing products and services, and we evaluate our suppliers based on responsible business criteria, and support sustainable waste management and make reasonable efforts to minimize our waste. We are open and report on how our activities affect the climate and environment in our CSR policy, and KJTG reports if we see an incident that harms the climate and the environment.

Every year, we seek to minimize the CO2 emissions in connection with our transports in Europe.

Principles of competition in KJTG

To execute fair competition is important to society and creates long-term business opportunities for KJTG in all the countries where we are present. Distortion of competition or exploiting an unfair advantage will damage our reputation with our customers, business partners and the authorities we cooperate with, and we will not contribute to this.

Anti-competitive agreements or practices are not only in breach of our standards but also of the law which KJTG follows in all its respects. We set our own pricing and business strategy, and our competitive advantage lies in what we have to offer compared to the competition.

We do not enter either formally or informally agreements or arrangements with current or potential competitors to share markets, set prices or restrict sales.

We have an obligation to immediately report suspected infringements of competition law to KJTG's Legal Department and our external permanent legal partner.

Financial integrity

Financial integrity is crucial for KJTG, as well as for a trust in our business partners and employees' trust in us. In addition to our obligation to comply with International Financial Reporting Standards (IFRS), it also enables us to manage our business in the most optimal way.

We record all transactions correctly in accordance with our legal obligations and good practices, as well as report accurately, reliably, transparently, consistently and in a timely manner. We ensure that expenses are reasonable and done correctly. We always check the facts, the completeness of the information and the underlying business rationale before approving a transaction or signing a document.

Health and Safety in KJTG

We all have a responsibility to ensure a healthy, safe and secure workplace for everyone KJTG, and our suppliers and guests. We recognize that we have a common commitment and a common responsibility to ensure a healthy, safe, and good environment in the company and throughout our value chain.

We comply with all international rules and guidelines for health and safety and strive to meet the highest standards in the field of international transport companies.

As one of our core values, we promote a proactive work culture by committing ourselves to having a healthy, safe and good working environment for our employees and everyone who works for us.

We promote a culture where we proactively report incidents in the areas of health, safety and personal safety from employees and suppliers.

KJTG support human rights principles

We all enjoy the same protection of human rights and workers' rights without discrimination as enshrined in international fundamental principles, conventions, and local legislation.

Respect for human rights is an integral part of KJTG's business and the way we work. Workers' rights are an important part of human rights. KJTG strive to contribute to a positive impact of human rights on society.

Protection of personal data and GDPR

Personal data includes information about employees, customers, and business partners such as communication, telephone numbers, e-mail addresses, addresses, locations, call and payment history, salary and health information. All personal information must be treated confidentially.

Responsible processing of personal data is crucial to maintaining the trust of our customers and employees in KJTG.

We do not share personal information with anyone who does not have a specific business purpose with them unless it has been authorized or required by law. We are open and honest with our customers and employees about how we use their information.

We ensure that personal information is processed with appropriate access control, security and data protection. We stay informed about our responsibilities regarding the protection of personal data when we work with projects or initiatives that include the processing of personal data. We follow the established procedures and processes for the protection of personal data.

KJTG is in full compliance with international law for the protection of personal data, and the European regulation called the General Data Protection Regulation (GDPR).

KJTG Work environment

All KJTG employees has the right to a good work environment, regardless of place of work, without harassment, intimidation, discrimination, or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race, ethnic origin, disability, national origin, religious or cultural beliefs or citizenship.

At KJTG, we see diversity among our employees as a competitive advantage, as it broadens our perspective and enables us to better understand our customers' needs throughout Europe.

Concluding remarks Executive Management

The Executive Management thank you for your participation in complying with this code of conduct in its entirety. We see it as our most important task, to build, expand, and maintain the organization so all employees in the company are safe and happy according to their work, colleagues, and the management. We hope that you will contribute forward to a constant improvement of the ethical foundation of KJTG.

Yours sincerely

The Executive Board and the Board of Directors

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