

A photograph of two men in high-visibility work clothes. The man in the foreground is smiling and looking towards the right. He has a beard and is wearing a bright green high-visibility jacket with a black strap across his shoulder. The man in the background is wearing a black cap with a headlamp and a similar high-visibility jacket. The background is a blurred industrial or construction site.

Labour **Code of Conduct**

September 2023



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DFDS as an inclusive workplace



Torben Carlsen
President & CEO

Being respectful, trusting and inclusive is what we can expect of one another when working in DFDS, regardless of time and place. Since 1866, DFDS has acted upon our commitment to care for the safety and wellbeing of our employees.

As we grow and transition towards a more sustainable business respected for providing reliable end-to-end services for people and goods, our responsibility is to keep nurturing the good working environment in DFDS.

This Labor Code of Conduct (LCoC), describes our minimum standard for critical working conditions of our employees. The aim is to prevent, remedy and account for any adverse human rights events across the company.

This includes the aspiration to promote a trusted and inclusive work environment that respects the individual.

We should all remember that perception matters. The intention with comments or behavior does not always match the perception of the receiver.

Part of nurturing our culture in DFDS is speaking up. We encourage all to report non-compliance concerns related to this LCoC enabling us to take the appropriate action on potential infringements. In that case, you are responsible for raising it through the appropriate channels like our whistleblower function, HR partner or your manager.

With this Labor Code of Conduct, I hope that no one is in doubt about what to expect when working in DFDS. We are thousands of colleagues with the passion, the skills and the commitment to continue making DFDS a great place to work.

Torben Carlsen
President & CEO

Our commitment:

- At DFDS, we believe in the importance of having a healthy work-life balance. We are committed to ensuring legal and reasonable working hours for all employees.

How we do it:

- In all locations, working hours will be aligned with local legislation.
- We encourage managers and employees to set targets achievable within acceptable working hours. Managers should make sure to not request excessive overtime work, and employees must remain mindful of not working overtime more than agreed.
- All overtime work beyond what has been contractually agreed should be done voluntarily and must be aligned with local regulation.

- At sea, situations can arise where the crew will have to work overtime. In such situations, the crew will be granted extra rest hours corresponding with the overtime work.
- Managers are responsible for ensuring that no unlawful overtime work occurs.
- All employees and managers must respect colleagues' free time and holidays. There is no obligation to read emails outside working hours and in case of an emergency contact is to be made in another way.

Working hours



Our commitment:

- We are committed to ensuring that all employees earn a fair living wage. The wage should at the least be sufficient to maintain a normal standard of living in the given location of employment. For employees working at sea, the wage should at the least be sufficient to maintain a normal standard of living in the employee's country of residence.
- All employees should receive equal pay for work of equal value regardless of their gender, race, ethnicity, age, sexuality, or disability.

How we do it:

- All salaries and benefits must at the least meet the specified minimum wage set by national law or the applicable collective bargaining agreement. If more than one of these are present, we strive to honour whichever one is higher. Further, we aspire to meet external industry benchmark standards.
- We commit to conduct annual salary reviews in which inflation and other factors are considered.

- In areas affected by extraordinary high inflation, salary reviews may be conducted more frequently upon agreement to investigate if there have been changes to the purchasing power due to the impact of inflation.
- All direct employees will be issued with an employment contract. Pay frequency and all other terms are pre-agreed and commitments honoured.
- We are committed to not using reduction in salary as a singular sanction against employees. Pay reductions may occur as a result of a disciplinary demotion that lead to a lesser level of responsibility.
- We are committed to ensuring that all employees are covered by social security.



Living wage



Leave

Our commitment:

- We believe in the importance of sufficient rest-periods and leave to prevent stress and promote a healthy work-life balance. We are committed to provide all employees with the breaks, rest-periods, and leave required to maintain a healthy work-life balance.

How we do it:

- As a minimum, we adhere to local legislation concerning breaks, leave, and annual leave.
- Our truck drivers are granted rest-time as stipulated by the EU Mobility Package or other local regulatory stipulations. We will ensure that third-party hauliers guarantee the same for their drivers.
- All employees are entitled to paid leave in accordance with national law and the Maritime Labour Convention.
- As a diverse workplace, we are committed to respecting various religious traditions when possible.

Our commitment:

- In DFDS, we have a zero-tolerance policy on discrimination, bullying, and harassment of any kind. All employees should feel respected and that they are always treated with dignity. We believe in the importance of equal treatment of all employees regardless of their background.

How we do it:

- When relevant, managers will receive training in diversity and inclusion. All employees receive our Code of Conduct, which includes anti-harassment and anti-discriminatory topics.
- We have a designated toolbox available to all managers which covers essential themes such as sexual harassment prevention, bias identification, and fair recruitment practices.
- We see diversity as a broad definition covering gender, race, ethnicity, nationality, religious beliefs, political views, sexual preference, age, disability, or marital status.
- We show zero tolerance towards any harassment or abuse. No employee should ever face humiliation, physical or mental abuse, sexual harassment, or any other form of mistreatment.

- We are committed to ensuring that managers have the appropriate skills and tools to remedy many types of issues. Furthermore, employees can address issues through the following channels:
 - Direct manager/supervisor (Land) or Head of Department/Master (Sea)
 - Local HR Business Partner (Land) or Crewing Department (Sea)
 - Any member of the Executive Management Team
 - The DFDS Whistleblower line - [link](#)
- Our DFDS Whistleblower line is managed by a third party.
- All reports are investigated thoroughly, and we are committed to making appropriate follow-up actions. We are committed to ensuring that the follow-up actions are fair to both parties involved and that they reflect the severity of the issue.



Equality, harassment and discrimination



Freedom of association and collective bargaining

Our commitment:

- We are committed to ensuring our employees' right to associate freely through unions, workers' associations, and other modes of collective bargaining.

How we do it:

- All employees have the right to form and join associations without fear of discrimination or retaliation.
- We encourage employees to elect employee representatives, and we engage with these representatives in good faith with full transparency.
- In areas where collective bargaining is prohibited by law, we will allow employees to develop alternative ways to express their opinions and care for their rights.

Employee privacy



Our commitment:

- We are committed to secure the right to privacy for all employees.

How we do it:

- We will only gather necessary personal data on our employees. We are committed to gather the least amount of personal data needed.
- We are transparent. Employees can at any time request information on how we use their personal data and what data we have collected.
- We have an extensive General Data Protection Regulation Policy, and all employees working with person-specific data are trained in complying with it.
- We always adhere to national legal requirements regarding the collection and disposal of data.
- Security cameras are only installed as a safety measure, and employee privacy is always considered before installation and use.

Forced and bonded labour



Our commitment:

- Under no circumstances should an employee work for DFDS on an involuntary basis. We guarantee that no employees work for us due to any sort of threat of penalty or sanctions.

How we do it:

- All employees have the right to receive a written employment contract in their local or working language.
- All employees have the right to terminate their employment and to receive any owed salary and genuine business expenses.
- We will never hold back original copies of employees' identity documents.
- We strive to ensure that any third-party providers of labour used by DFDS hold the proper certifications and licenses to operate.



Child labour and young workers

Our commitment:

- We are strongly committed to never accept child labour.

How we do it:

- We are committed to always adhere to local legislation regarding employment of persons below the age of 18.
- We will not employ any person under the age of 15 regardless of local legislation.
- Persons under the age of 18 are withheld from working night shifts, working tasks that pose a risk of physical harm, or working with hazardous materials.
- If child labour is confirmed within a third-party labour provider, we will take shift measures in the best interest of the child.

Our commitment:

- In alignment with the UN Guiding Principles on Business and Human Rights, People Division carries out human rights' due diligence based on the minimum requirements described in this Labour Code of Conduct. This includes identifying and assessing risks – both actual and potential – to human rights and acting upon the findings. The process also includes thoroughly communication on how and which measures are taken to mitigate them. This due diligence process is included in the People Division processes and will be conducted on a regular basis or when emerging risks are identified.



Human rights'- due diligence

“Speak up” culture

It is our common responsibility to promote a “speak up” culture. Whenever the principles of this document are breached, the non-compliance must be voiced and dealt with. We are committed to promoting an environment where open communication is the expectation, not the exception. To report any non-compliance with the Responsible Employer Policy or any other unwanted behaviour, the concern should be raised through one of following channels:

- Direct manager/supervisor (Land) or Head of Department/Master (Sea)
- Local HR Business Partner (Land) or Crewing Department (Sea)
- Any member of the Executive Management Team
- The DFDS Whistleblower line - [link](#)

Non-retaliation

We will not retaliate nor tolerate retaliation against any employee who raises an issue, complaint, or concern in good faith. We will deal fairly and equitably with each case and each employee.

How to report

Executive Management Team

Torben Carlsen
President & CEO

Karina Deacon
Executive Vice President & CFO

Niklas Andersson
Executive Vice President, Logistics Division

Mathieu Girardin
Executive Vice President, Ferry Division



Anne-Christine Ahrenkiel
*Executive Vice President,
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