



Supplier Code of Conduct

May 2022





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DFDS supplier ethics



**Respecting
human rights**



**Trade
sanctions**



**Environment
& climate**



**Diversity &
inclusion**



**Conflicts
of interest**



**Health
& Safety**



**Non-discrimination
and anti-
harassment**



**Bribery and
facilitation
payments**

DFDS Responsible Procurement policy



Vision

It is the ambition of DFDS to be a sustainable business with great people trusted to provide the most reliable services and transport of people and goods. We grow by partnering and innovating with industry peers, customers and suppliers, and we seek to care for and develop our people every day.



Mission

DFDS has a responsible and sustainable approach to procurement. We base our practices on the principles related to human rights, labor, environment, and anti-corruption in the United Nations Global Compact. We adhere to DFDS' Code of Conduct, national and international rules. We pursue full alignment of our procedures with the DFDS sustainability policies by identifying areas where interventions have the greatest potential to improve environmental and social impact.



Strategy

Group Procurement applies UN Global Compact principles to all internal activities in every step of the procurement process. As part of our responsible approach to deliver upon the ESG agenda (Environmental, Social and Governance) we are committed to:

- Ensuring suppliers become signatories of DFDS' Supplier Code of Conduct
- Conduct assessments when tendering with preference towards partners engaged in and actively contributing to lowering their own emissions and throughout their supply chain
- Monitoring existing suppliers and taking all necessary actions to remediate possible violations of law and principles throughout the DFDS supply chain
- Proactively engaging with external suppliers, partners and internal stakeholders to continuously improve in all areas of the ESG agenda



Dear Partner

A new era is in the making as the Environmental, Social, and Governance (ESG) agenda moves corporate citizenship to the top of our strategic priorities.

How we contribute to society and to the collective good are a focal point in our actions and in our dialogue with stakeholders – including suppliers.

Through DFDS' Responsible Procurement Program, we endeavor to work with suppliers who share a similar commitment to responsible business practices.

DFDS' Supplier Code of Conduct includes the values and the requirements that we expect our suppliers to live up to when conducting business in an environmentally responsible, ethical, and social way. Our Supplier Code of Conduct describes what behaviours we value, and how we expect suppliers to respond to ethical issues.

As a signatory to the UN Global Compact, we base our practices on the principles related to human rights, labour, environment, and anti-corruption in the United Nations Global Compact.

Responsible Procurement is our way of working together with our suppliers. We strive to continuously improve and support suppliers throughout the journey to meet our Supplier Code of Conduct requirements. By working together, we can provide sustainable solutions and embed sustainability in our industry.

As a valued supplier of DFDS, I count on your commitment and support for our Responsible Procurement program. I also encourage you to go beyond regulatory compliance and proactively adopt responsible good practices which will support us in reaching higher sustainability standards.

Thank you for your continued support.

Torben Carlsen
President & CEO



Introduction

- DFDS' Supplier Code of Conduct sets the standard for our supply chain to operate in accordance with business principles expressed by this code
- It applies to first-tier suppliers, parent, subsidiary, or affiliate entities, as those with whom they do business, including suppliers, subcontractors, joint venture partners, and other third parties. It shall be suppliers' responsibility to ensure that their business relationships also have processes to manage their adverse impacts on human rights, labour, environment, and anti-corruption
- As DFDS suppliers are an extension of our business, we may cause adverse impacts through our purchasing practices. DFDS expects all our suppliers to meet the expectations outlined in this Supplier Code of Conduct

Implementation

- DFDS expects suppliers to adhere to applicable laws of their areas of operation. Where national laws provide for better or lesser protection of human and labour rights, environment, and anti-corruption, the higher standard shall apply
- We expect suppliers to adopt a policy statement fully committed to the international principles and standards outlined in DFDS' Supplier Code of Conduct
- We expect and encourage our suppliers to develop and implement relevant management systems appropriate for a company of their size and industry to comply with applicable laws and regulations and the DFDS Supplier Code of Conduct requirements

Reporting and remediation system

- We expect suppliers to establish a process of continuous due diligence concerning their actual and potential adverse impacts on human and labour rights, the environment, and anti-corruption
- We expect our suppliers to have a reporting system to ensure that employees can voice grievances anonymously and without fear of reprisals on any aspect of this Supplier Code of Conduct. All grievances should be investigated in a fair and timely manner
- If a supplier discovers or is informed that it causes or contributes to an adverse impact, the supplier shall enable access to remedy through legitimate processes for those affected and/or inform the relevant authorities. The remediation process must be legitimate, accessible, predictable, equitable, transparent, aligned with international principles, continually updated, and based on dialogue
- If a supplier did not cause nor contribute to an adverse impact but is linked to it through its value chain, the supplier shall use its leverage to make the causing entity prevent reoccurrence, provide a remedy for those affected and inform the relevant authorities



Supplier Code of Conduct

Health
and Safety

Environmental
principles

Human and
labour rights

Business
ethics



Health and Safety

Suppliers must provide a safe, secure, and healthy working environment for their entire workforce, and we expect suppliers to;

- 1 Develop and implement effective health and safety management systems
- 2 Evaluate the health and safety consequences of all relevant investment decisions
- 3 Constantly seek ways to improve health and safety
- 4 Ensure each employee has adequate training for the safe execution of assigned tasks and knowledge of health and safety appropriate to the position
- 5 Monitor the effectiveness of the DFDS procurement policy and associated management systems
- 6 Annually review and set targets for health and safety
- 7 Evaluate, control, and minimise risks associated with activities
- 8 Have clear contingency plans for health, safety, and environmental damage in the event of incidents/accidents
- 9 Report and investigate all incidents, accidents, and near misses related to health, safety, and the environment and implement preventative measures to avoid repetition
- 10 Fulfil applicable compliance obligations and legal requirements related to our operations



Environmental principles

Suppliers should minimise their impact on the environment and comply with all relevant local and national environmental laws as well as international standards. Suppliers should manage their impact on:

- 1** Emissions to air
- 2** Releases to water and land
- 3** Use of raw materials, natural resources, and energy
- 4** Animal welfare
- 5** Energy emitted as heat, waste, radiation etc.
- 6** Biodiversity





Human and labour rights

Suppliers are expected to respect and promote impact on human and labour rights:

- 1 Right to self-determination (indigenous peoples) and non-discrimination
- 2 Right to work (training, contract, and termination)
- 3 Right to equal pay for equal work, a living wage (minimum wage), safe and healthy working conditions, equal opportunities for promotion and rest, leisure and paid holiday
- 4 Right to form and join trade unions and to strike, and to social security (including social insurance)
- 5 Right to protection of mothers before and after childbirth and of children and young people from exploitation (no child labour)
- 6 Right to adequate food and its fair distribution, adequate clothing and housing, water and sanitation
- 7 Right to life, health, and education
- 8 Right to take part in cultural life, benefit from scientific progress, material gains from inventions, and copyright protection
- 9 Right not to be subjected to torture, cruel, inhumane, or degrading treatment or punishment, and right to free, prior, and informed consent to medical/scientific experimentation
- 10 Right not to be subjected to slavery, servitude, or forced labour
- 11 Right of detained persons to humane treatment
- 12 Right not to be subjected to imprisonment for an inability to fulfil a contract
- 13 Right to liberty and security of person and freedom of movement
- 14 Right of aliens to due process when facing expulsion (seeking asylum)
- 15 Right to a fair trial
- 16 Right to be free from retroactive criminal law and recognition as a person before the law
- 17 Right to privacy
- 18 Right to freedom of thought, conscience, religion, and freedom of opinion, expression, information
- 19 Right to freedom from war propaganda and incitement of racial, religious, or national hatred
- 20 Right to freedom of peaceful assembly and association
- 21 Right to protection of the family and to marry, protect the child, and acquire a nationality
- 22 Right to participate in public affairs
- 23 Right to equality before the law, equal protection of the law, and rights to non-discrimination
- 24 Rights of minorities (culture, religious practice, language)



Business ethics

Suppliers should establish adequate processes to conduct their business at the highest ethical standard:

- 1** Documenting, recording, and keeping income and expenditure data available for periods determined by law, or, if unregulated, for a minimum of three years
- 2** Zero-tolerance towards corruption of public officials or private-to-private corruption, including both 'active' and 'passive' corruption (also referred to as 'extortion' or 'solicitation')
- 3** Zero-tolerance towards payment of bribes or trading in influence in relation to business partners, government officials, or employees, including through the use of intermediaries
- 4** Not hiring government employees to do work that conflicts in any manner with the former official obligations of that employee
- 5** Not permitting political contributions, charitable donations, and sponsorships in expectation of undue advantages
- 6** Not offering or accepting excessive gifts, hospitality, entertainment, customer travel, and expenses if not previously approved by a senior officer and explicitly recorded in the books of the business, naming the recipient or giver
- 7** Not permitting the use of facilitation payments unless you are subject to threats or other coercion
- 8** Abstaining from nepotism and cronyism
- 9** Not permitting or participating in money laundering
- 10** Adhere to anti-trust and other competition laws
- 11** Disclose any potential or actual conflict of interest to DFDS
- 12** Adhere to data privacy laws and comply with contractual requirements on confidentiality and information security



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