

# Supplier Code of Conduct



**April 2024**

# About SDK FREJA

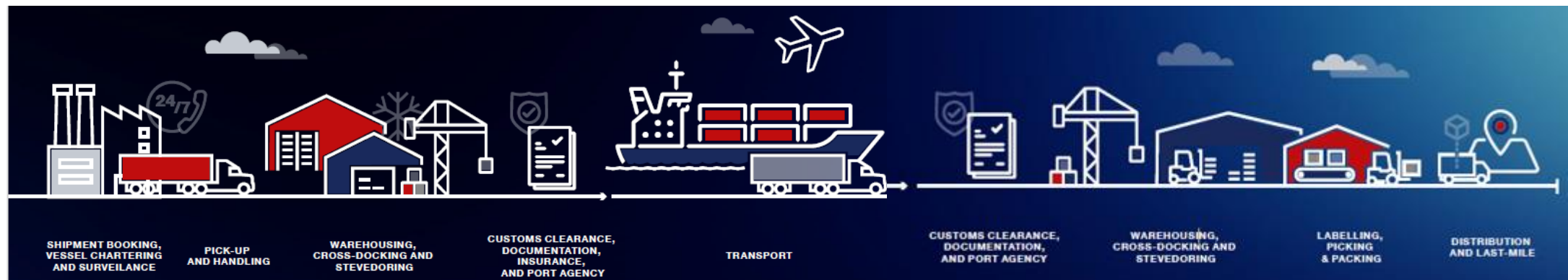
SDK FREJA is a full-service shipping and logistics company.

SDK FREJA is a dynamic and growing company with the objective to continuously develop the core business to be at the forefront of the latest advancements that cater to our customers' wishes and expectations.

SDK FREJA is one of the few independent and privately owned local shipping, logistics.

The main objective of the parent company, SDK FREJA A/S, is as a holding company to hold shares in the subsidiaries and contribute to their continued development.

The shipping and logistics activities of SDK FREJA include freight forwarding within Road, Air & Sea and Project Cargo, Contract Logistics as well as Stevedoring, Port Agency, Customs Clearing, Chartering, Liner and Cruise services. We offer specialist logistics solutions within Healthcare, Warehousing and Refrigeration.



Søren Gran Hansen  
Group CEO SDK FREJA A/S



SDK FREJA is committed to conducting business ethically, responsibly, and sustainably. As part of our commitment to these principles, we expect our suppliers and business partners to adhere to the highest standards of conduct. This Supplier Code of Conduct outlines the expectations and requirements that all suppliers must meet when conducting business with one of our companies.

### Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national, and international laws and regulations that pertain to their business operations. This includes, but is not limited to, laws related to labor, environmental protection, anti-corruption, and health and safety.

When we at SDK FREJA enter into agreements with Customers, partners or subcontractors, we expect our partners to uphold the same values and ethical standards to which we have committed ourselves. It is therefore important that you, as a subcontractor, read this Code of Conduct and confirm to us that you can adhere to these guidelines.



# Ethical Conduct



Suppliers are expected to maintain the highest standards of ethical conduct in all their business activities. This includes:

- a. Integrity: Conduct business with honesty, integrity, and transparency.
- b. Anti-corruption: Prohibit all forms of bribery, kickbacks, and corrupt practices.
- c. Fair competition: Compete fairly and ethically, avoiding anti-competitive behavior.
- d. Conflicts of interest: Disclose and manage conflicts of interest appropriately.



# Labor and Human Rights



Suppliers must respect the human rights and dignity of all individuals involved in their operations. This includes:

- a. Forced labor: Prohibit the use of forced, bonded, or involuntary labor in any form.
- b. Child labor: Comply with applicable laws regarding child labor and ensure that no child labor is used.
- c. Non-discrimination: Promote diversity and inclusion and ensure that all employees are treated fairly, regardless of race, gender, religion, age, disability, sexual orientation, or any other protected characteristic.
- d. Working conditions: Provide safe and healthy working conditions and ensure that employees are not subject to harassment or abuse.
- e. Freedom of association: Respect the rights of employees to freely associate and collectively bargain.



# Environmental Responsibility



Suppliers are expected to minimize their environmental impact and promote sustainability in their operations. This includes:

- a. Environmental compliance: Comply with all applicable environmental laws and regulations.
- b. Resource conservation: Conserve natural resources, reduce waste, and promote recycling.
- c. Pollution prevention: Take measures to prevent pollution and minimize emissions.
- d. Sustainable sourcing: Encourage the use of sustainable materials and practices in the supply chain.



# Health and Safety



Suppliers must prioritize the health and safety of their employees and contractors. This includes:

- a. Workplace safety: Maintain a safe working environment and provide necessary safety training.
- b. Emergency preparedness: Have procedures in place to respond to emergencies and accidents.
- c. Hazardous materials: Safely handle, store, and dispose of hazardous materials.



# Transparency and reporting



Suppliers should be transparent about their operations and practices. They must:

- a. Maintain accurate records and documentation.
- b. Promptly report any violations of this Supplier Code of Conduct or any legal breaches.

Link to our whistleblower reporting. <https://freja.indberet.nu/> or <https://sdk.indberet.nu/>





# Examples on when to report

**Financial Fraud:** Suspected embezzlement or misappropriation of funds. Accounting irregularities or fraudulent financial statements. Insider trading or securities fraud.

**Workplace Harassment and Discrimination:** Discriminatory hiring, promotion, or firing practices. / Harassment based on race, gender, age, sexual orientation, or other protected characteristics. / Retaliation against employees who report harassment or discrimination.

**Safety and Environmental Concerns:** Unsafe working conditions or practices. / Environmental violations, such as illegal dumping or pollution. / Failure to comply with health and safety regulations.

**Corruption and Bribery:** Bribery or kickbacks involving employees, suppliers, or customers. / Misuse of company resources for personal gain. / Conflicts of interest that are not properly disclosed.

**Data Privacy and Cybersecurity:** Data breaches or unauthorized access to sensitive information. / Theft of intellectual property or trade secrets. / Failure to protect customer or employee data.



# Examples on when to report

**Unethical Conduct:** Violations of the organization's code of conduct or ethical guidelines. / Fabrication of records or documents./ Misrepresentation of products or services.

**Whistleblower Retaliation:** Retaliation against employees who have reported misconduct or violations. / Acts of intimidation, harassment, or discrimination against whistleblowers.

**Regulatory Non-Compliance:** Violations of industry-specific regulations. / Non-compliance with government laws and regulations.

**Health and Safety Violations:** Failure to adhere to safety protocols that put employees or the public at risk. / Covering up accidents or safety incidents.

**Fraudulent Activities:** Fraudulent claims, invoices, or expense reports. / Forgery or fraudulent use of company assets.



# SDK FREJA Reserve the right to:

## Compliance Monitoring

SDK FREJA may conduct periodic assessments and audits to ensure supplier compliance with this code of conduct. Suppliers are expected to cooperate fully with these assessments and provide access to relevant facilities and records.

## Consequences of Non-Compliance

Failure to comply with this Supplier Code of Conduct may result in various actions, including termination of the business relationship with SDK FREJA.

## Conclusion

By conducting business with SDK FREJA, suppliers agree to uphold the principles outlined in this Supplier Code of Conduct. We expect all suppliers to be committed to ethical and responsible business practices, and together, we can create a sustainable and responsible supply chain.

