

# Our Code of Conduct

Our Code of Conduct is applicable for all employees - including temporary staff, its subsidiaries and others that work on behalf of Viasea. It is all managers responsibility to communicate and promote this Code of Conduct to all employees, and to be a role model by operating according to these principles. Our company must lead with integrity and responsibility in all areas we operate in, and this Code of Conduct is our governing document on what we build our business upon. There are no exceptions to these commitments.

Violations may lead to disciplinary actions and could have consequence for your employment.

You are expected to familiarize yourself and to live up to this Code of Conduct, and let your voice be heard if you at any time witness violations.

These principles are based on UN and ILO conventions and provide minimum, not maximum standards. If this Code of Conduct operates with higher standard than the laws and regulations in the country you operate in, you should operate in compliance with the Code of Conduct.

## 1. Compliance with laws

Viasea commits to conduct business with respect for the law and the cultures in the countries we operate in. In all activities we must comply with applicable National laws and regulations. However, where national laws and regulations address the same subject as these guidelines, the most stringent shall apply.

Unethical and illegal behaviour is not permitted.

## Creating a Great Place To Work

We believe that it is when you dare to be great that a company can thrive and be truly successful. The key is in dedicated employees and partners and we know that it is the people that are our most valuable assets.

Our work place should reflect our dedication and the values which is the basis for our business concept.

- **Humor** – Have fun at work
- **Reliability** – Be reliable
- **Respect** – Always show respect
- **Smart** – Be smarter than the competition

Every employee and partner are obligated to ensure that Viasea is a great place to work.

## **2. Labour and human rights**

In Viasea we have respect for all labor – and human rights. Everyone should be treated with fairness and given equal opportunities. We promote living wages and a safe and sound working environment. All employees has the right to a contract which states their salaries and working hours. Salaries should always be enough to meet basic needs including some discretionary income, and meet national legal standards or industry benchmark standards, whichever is higher. Working hours shall comply with national laws.

## **3. Equal opportunities**

At Viasea we are committed to provide all employees equal employment opportunities. Our policies are designed to promote fairness and equal opportunities no matter your religious or ethnic Background, age, gender, sexual orientation, race, disability, nationality and political opinions. This includes our hiring practices. Recruiting is done solely on job-related criteria's, whether it is internal or external recruitment.

## **4. Discrimination and harassment**

All Viasea employees have the right to work in an environment that is free from discrimination and harassment. This includes (but is not limited to), intimidation, discrimination or abuse, sexual, racial or otherwise, as well as acts or threats of physical or mental violence. All employees shall be treated with respect and dignity.

Inappropriate behaviour will not be tolerated.

## **5. Health and safety at work**

Viasea shall be a safe work place for all. Our ZERO accident philosophy shall be the basis for creating proper health and safety measures. All workers shall receive regular health and safety training and this training shall also be part of the onboarding process for new employees.

## **6. Drugs and alcohol**

Viasea does not allow use of alcohol or drugs on Viasea premises while carrying out Viasea's business. This includes medical prescription drugs that might influence the ability to work.

## **Responsible Business Conduct**

Viasea vision is to improve our customers competitiveness through innovative and integrated logistic services of high quality and flexibility. Viasea believes that the engagement we have to do business must never lose sight of the importance to do our business responsibly. The concept of responsible business conduct is applicable for our whole value chain.

## **7. Freedom of Association and the Right to Collective Bargaining**

All employees has the right to join or form trade unions of their own choosing and to bargain

collectively. Their representatives shall not be discriminated and shall have access to carry out their functions at the workplace. If your country has restrictions under law, Viasea shall facilitate and not hinder the development of alternative forms of independent and free workers representation and negotiations

## **8. Forced and Compulsory Labor**

There shall be no forced, bonded or prison labor. No one shall be required to lodge deposits or identity paper and shall be free to resign after reasonable notice. This include a zero tolerance for modern slavery and human trafficking.

## **9. Child Labor:**

Viasea will not tolerate use of or support child labor. Viasea has a policy for young workers which must be strictly adhered to. Young workers are referred to as 15-18 years old and shall only be employed for summer work, extra work or similar. Younger workers than 15 are not allowed. No young worker shall perform night work, overtime work or work hazardous to their health, safety or morals. The young workers managers/ supervisor are obligated to go through a special training to take care of the young workers interest.

## **10. Conflict of interest**

A conflict of interest occurs when an individual's private interest interferes in any way, or even appears to interfere with the interests of Viasea. We avoid conflicts of interest; we will always act in the best interest of Viasea.

## **11. Bribery and corruption**

Viasea define bribery and corruption as the misuse of an official position by Viasea employee or anyone acting on behalf of Viasea, for unofficial and personal enrichment, and/or the enrichment of others, through bribery, fraud or favor. There is a zero tolerance towards bribery and corruption in any way, shape or form. No one, acting on behalf of Viasea, may accept or offer bribes, kickbacks, loans or other corrupt practices when conducting Viasea business.

## **12. Money laundering and Terrorism**

Viasea is committed to comply fully with all anti-money laundering and anti-terrorism laws, we shall not accept, facilitate or support money laundering and terrorism.

## **13. Fair competition**

We at Viasea strongly believe in fair competition and free market, which is based on the added value of our services. We will compete in compliance with all applicable competition laws.

## **14. Gifts and hospitality**

We at Viasea do not request gifts and hospitalities, nor do we accept gifts and hospitalities. We also do not provide gifts or hospitalities to any business partner or third party. In such case, that acceptance or

offer of any gifts or hospitalities and events may be a legitimate contribution to building or maintaining good business relationships, these gifts should be limited to items of little commercial value. Such gifts should not influence any professional business decision-making process.

## 15. Privacy and Data Protection

Information produced and stored on ColliCare IT systems is regarded as the property of the company and use of this information should be used for business on behalf of Viasea. For more details we refer to the IT policy and the Non-Disclosure Agreement.

## 16. Protecting the Environment

Viasea actively work for reducing the negative impact on the environment. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution when possible. It is expected that you have a sustainable approach in your day to day operations and participate actively in our environmental actions and programs.

If you have questions about this code of conduct you can reach out to your supervisor or the Sustainability team ([hseq@collicare.no](mailto:hseq@collicare.no)) for answers.

If you suspect breaches, misconducts or witness violations, contact your supervisor immediately or use our Whistleblower procedure. The Whistleblower procedure can be used by all employees and external stakeholders and secures anonymity if desired. Any reports of concern will be treated with confidentiality by our [HR department](#), and we ensure no retaliations. Reports of misconducts is safe and taken seriously.

<https://www.collicare.com/corporate-social-responsibility/whistleblowing>

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