

ALL THE WAY



MAERSK

A.P. MOLLER - MAERSK

Supplier Code of Conduct



Contents

| | | | |
|--------------------------|---|---------------------------------------|----|
| Message from the CEO | 3 | Harassment | |
| Introduction | 4 | Security Guards | |
| Implementation | 5 | Working with Integrity | 11 |
| Speaking Up | 6 | Anti-corruption | |
| Supplier Code of Conduct | 7 | Anti-Money Laundering | |
| Health and Safety | 8 | Data Ethics & Cyber security | |
| Labour Rights | 9 | Competition law | |
| Child Labour | | Sanctions and Export Controls | |
| Freely Chosen Employment | | Conflict of interest | |
| Employment Contracts | | Environment | 13 |
| Compensation | | Environmental Compliance & Monitoring | |
| Working Hours | | Management of Hazardous Substances | |
| Freedom of Association | | Waste and Wastewater Management | |
| Discrimination | | Air Emissions | |
| | | Resource Use | |
| | | Biodiversity & Ecosystems | |
| | | Climate Change | |



Message from the CEO

Dear valued suppliers,

At A.P. Moller - Maersk, our deeply rooted values drive the way we do business, and we live by them each day. These values reflect our commitment to sustainable development and guide us in conducting our business in an ethical and upright manner.

Our suppliers play a vital role in the way we conduct our business and deliver value to our stakeholders. We endeavour to work with suppliers who share our commitment to continuously strengthening responsible business practices. Through this Supplier Code of Conduct, we communicate the minimum requirements that we expect our suppliers to follow while conducting business in an ethical, socially and environmentally responsible manner. These requirements are based on the United Nations Universal Declaration of Human Rights, ISO standards on HSE, the core labour conventions of the International Labour Organisation (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

We require our suppliers to commit and act in accordance with the requirements under this Code and extend similar standards to their supply chain partners. Our procurement practices are designed to work collaboratively with our suppliers through a continuous improvement

“Our suppliers play a vital role in the way we conduct our business and deliver value to our stakeholders.”

approach. By working together with our suppliers, we can provide sustainable solutions to our customers and embed sustainability in supply chains as well as the wider transport and logistics industry.

As a valued supplier of A.P. Moller - Maersk, I count on your commitment and support to continuously adopt and promote responsible business practices. I also encourage you to go beyond compliance and strive for higher standards of sustainability.

Sincerely,



Vincent Clerc
CEO of A.P. Moller - Maersk

Introduction

As a global company, A.P. Moller - Maersk takes active responsibility for the societies and environment that we operate in. We take constant care to avoid causing or contributing to adverse impacts on people across our value chain.

The A.P. Moller - Maersk Supplier Code of Conduct (hereinafter referred to as 'Code') sets out minimum requirements for the Suppliers (hereinafter referred to as 'Suppliers') of A.P. Moller - Maersk and the Maersk Group's affiliates and subsidiaries to operate in accordance with responsible business principles detailed in this Code and in full compliance with all applicable laws and regulations.

This Code reflects our commitment to the United Nations Global Compact (UNGC)¹ and our respect for universally recognized normative standards such as the United Nations Universal Declaration of Human Rights² and Convention against Corruption³, the core conventions of the International Labour Organisation (ILO)⁴ and the ILO Declaration on Fundamental Principles and Rights at Work⁵, the United Nations Guiding Principles on Business and Human Rights⁶, and ISO standards on Health, Safety, & Environment (HSE)⁷⁺⁸.

Where the provisions of local and national laws conflict with or are less stringent than this Code or international standards, we expect our

Suppliers to apply the stricter standard. In the event that standards in this Code conflict with local and national laws as well as international standards, we encourage our Suppliers to address such conflicts with us in order to jointly establish the most appropriate course of action.

For further guidance on successful implementation of the principles and standards mentioned in this Code, kindly refer to the relevant/supporting resources, available on our [website](#).



1. [United Nations Global Compact, The Ten Principles of the UN Global Compact](#)
2. [United Nations, United Nations Universal Declaration of Human Rights](#)
3. [United Nations, United Nations Convention against Corruption](#)
4. [International Labor Organization, Conventions, Protocols and Recommendations](#)
5. [International Labor Organization, ILO Declaration on Fundamental Principles and Rights at Work](#)
6. [The Office of the High Commissioner for Human Rights \(OHCHR\), 'United Nations Guiding Principles on Business and Human Rights](#)
7. [International Organization for Standardization, 'ISO 45001:2018'](#)
8. [International Organization for Standardization, 'ISO 14001:2015'](#)

Implementation

The Code applies to all Maersk Suppliers. For the purposes of this Code, 'Suppliers' refers to Suppliers and sub-contractors, agents, consultants and their respective affiliates which provide goods and/or services to Maersk.

Our Suppliers are required to acknowledge and commit to the adherence of the responsible business principles as outlined in this Code. We assess our Suppliers' compliance with the Code through a combination of audits, self-assessments, and documentation reviews through our Sustainable Procurement Program. Suppliers should address any gaps in the implementation of this Code by establishing and implementing a time-bound improvement plan in consultation with Maersk. Periodic reviews and follow-up audits as per our internal risk procedures are conducted to monitor compliance levels. We are committed to working with our Suppliers on their compliance and sustainability journey and expect full transparency as a foundation for our business relationships.

We expect and encourage our Suppliers to develop and implement relevant management systems, appropriate for a company of their size and industry, to ensure compliance with applicable laws and regulations and the requirements of the Code.

We further expect our Suppliers to implement the principles and standards of this Code or similar internationally recognized standards in their own supply chain, including in their relationships with their suppliers, contractors, and joint venture partners. All Suppliers should ensure that the Code is communicated to their own suppliers and commit to upholding the requirements as outlined in the Code.

The underlying objective of this Code is to establish a basis for positive development of sustainable procurement practices through regular dialogues and ongoing working relationships. However, in case of violations of the Code we reserve the right to take actions including and up to termination of contracts.





Speaking Up

We expect our Suppliers to have a grievance mechanism in place to ensure that workers can voice grievances anonymously and without fear of reprisals on any aspect of this Code. All grievances should be investigated in a fair and timely manner and Suppliers should provide for or contribute to appropriate, adequate and effective remedy.

We also welcome concerns from anyone within or outside of Maersk if they suspect or know of any potential or actual violations of this Code. We do not tolerate retaliation against persons making reports in good faith.

Suppliers can report concerns through the channel they are most comfortable with including Maersk representatives or relationship partners or the Maersk Whistleblower System. The Whistleblower System is administered by an independent company and is available 24 hours a day, 7 days a week. It can accommodate calls in more than 75 languages and offers the ability to submit a report anonymously.

To report a concern online using the Maersk Whistleblower System – please visit www.maersk.ethicspoint.com. Suppliers are required to communicate the existence of this channel and to ensure that their employees as well as their subcontractors are made aware of its existence.

Supplier Code of Conduct

- Health and Safety
- Labour Rights
- Working with Integrity
- Environment





Health, Safety & Security

We expect our Suppliers to strive to provide a safe, healthy and secure workplace to all workers at all times.

- Suppliers must ensure compliance with applicable laws and regulations regarding health and safety.
- Suppliers must develop and implement effective health and safety management systems with worker participation in safety committees.
- Suppliers must ensure that safety management systems support risks identification, measurement and monitoring of performance and the drive for continual improvements to mitigate or minimize health and safety risks emanating from its operations.
- Suppliers must ensure the protection of their workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on health and safety systems.
- Suppliers must empower workers to report unsafe practices without fear of reprisal.
- Suppliers must commit to proactively undertaking safety initiatives to protect people and assets from harm and damage.
- Suppliers must have a clear set of procedures in place to respond to any potential emergency situations, including worker notification and evacuation procedures, first-aid supplies, fire detection/control equipment and clear and unrestricted exits from the site.





Labour Rights

Suppliers are expected to work towards creating and sustaining a working environment where workers are treated with dignity and respect and which is diverse, equitable and inclusive.

Child Labour

- Suppliers must not use or tolerate the use of child labour. Suppliers must not employ children who are below the local minimum working age, the age of compulsory education or the ages set out in the International Labour Organization Core Conventions (whichever is higher).
- Suppliers must ensure that workers, including trainees, under the age of 18, do not undertake nightshift work or work overtime or carry out work that is hazardous or harmful to their physical or mental development.

Freely Chosen Employment

- Suppliers must not engage in any form of forced labour or human trafficking, use or benefit from any kind of forced or involuntary, bonded or indentured labour and should refrain from practices that can give rise to a risk of involuntary labour.

- Suppliers and their recruiting agencies must not charge workers recruiting or hiring fees, whether paid by workers out of their own funds or which gives rise to the risk of workers being indebted to Suppliers.
- Personal official documents, including passports and travel documents, must stay in the possession of the worker. They can only be kept by the Supplier in a secure place at the request of the worker and must be accessible to the worker at all times.

Employment Contracts

- Suppliers must ensure that employment terms and conditions, including payment terms, are clearly understood by workers, and provided in a written contract in a language they understand prior to the start of their work, as per local regulations and aligned to the provisions of this Code as a minimum.⁹

⁹ In US, workers are employed at will. Offer letters and an employment handbook or a collective bargaining agreement with a union covering employment terms may be sufficient.



Compensation

- Suppliers must adhere to relevant national laws relating to minimum wages, overtime wages and legally mandated benefits.
- If no national statutory minimum wage applies, Suppliers must ensure that the remuneration is fair in the context of the local circumstances and sufficient to meeting workers' basic needs.
- Suppliers must ensure that salary deductions that are allowed by applicable local legislation are fair and reasonable and not punitive. Pay slips must be provided in writing.

Working Hours

- Suppliers must comply with appropriate working hour requirements including overtime, breaks, and rest periods – as established by national law, relevant collective agreements, and international standards.
- Suppliers must ensure that any overtime work is voluntary and compensated and that overtime is not done on a systematic or structural basis.
- Suppliers must adhere to relevant national laws, industry standards and international standards for paid sick leave, paid annual leave, and paid parental leave.

Freedom of Association

- Suppliers must respect the workers' right to associate freely and join or not join trade unions in accordance with national laws and international conventions.
- Suppliers must rely on open communication and direct engagement with workers when addressing workplace issues and must refrain from threats of reprisal, intimidation or harassment.

Discrimination

- Suppliers must provide equal opportunities and support to all workers and must not discriminate against anyone based on any grounds such as age, gender, sexual orientation, gender identity or expression, ethnicity, race, physical appearance, culture, religion, national or social origin, political views, marital status, pregnancy, dependents, bodily/mental ability or trade union membership.
- Particular attention must be paid to the rights of workers most vulnerable to discrimination.
- Suppliers must take extra precautions to respect the rights and wellbeing of migrant workers whose rights may be at risk or who may lack access to basic public services.

Harassment

- Suppliers must treat all workers with respect and dignity. The work environment should be free from bullying, intimidation, coercion, corporal punishment or harassment in any form including physical, psychological, sexual or verbal.

Security Guards

- Suppliers must ensure that security guards operating at Suppliers' premises act in accordance with universally recognized human rights standards including guidelines on the use of force.¹⁰

¹⁰ [The Voluntary Principles Initiative, Voluntary Principles on Security and Human Rights](#)



Working with Integrity

Suppliers should conduct their business in a manner that ensures transparency, honesty and ethical conduct in all interactions. We expect our Suppliers to have zero-tolerance for corruption and ensure compliance with all UN and Organisation for Economic Co-operation and Development (OECD) conventions against corruption¹¹, and with all governing anti-corruption laws.

Anti-corruption

- Suppliers must avoid participation in, or knowingly benefit from, any kind of corruption, extortion or bribery.
- Suppliers must establish and enforce a written policy against illegally influencing or bribing public officials, business partners or customers and promote workers' awareness of the same.
- Suppliers must be transparent about commercial, financial or any other significant direct or indirect links to government agencies or departments, political parties and public/government owned entity officials.

- Suppliers must not present any invitations or gifts to our employees so as to gain any form of influence or inappropriate advantages. Any invitations or gifts extended to Maersk employees or related parties, if any, must be reasonable and suitable, i.e., they must be of a low financial value and reflect ordinary local business custom.
- Suppliers must record and report any offer, receipt, or request to give bribes or facilitation payments. Suppliers must also challenge any request to make or receive bribes or facilitation payments, which must be actively refused unless there is a threat to personal safety.

Anti-Money Laundering

- Suppliers must comply with all applicable laws governing the prevention of money laundering and not participate in any money laundering activities.

¹¹ [Organisation for Economic Co-operation and Development \(OECD\), Anti-corruption and integrity](#)





Data Ethics & Cyber security

- Suppliers must protect data generated or entrusted to them in order to deliver services to Maersk and our customers and commit to only using such data responsibly and for the intended purpose.
- Suppliers must comply with all applicable regulatory requirements, including data protection and information security laws relating to the processing, transmission, or disclosure of such data and information.
- Suppliers must safeguard all Maersk data and information from unauthorized access, disclosure, or use, and adhere to confidentiality and data protection requirements specified in agreements.
- When operating technology or infrastructure in support of Maersk business operations, Suppliers must keep such technology secure and protected against unauthorized access that may compromise confidentiality, integrity, availability or safety.
- Suppliers must ensure personnel are trained in the correct usage and protection of data and information in compliance with the above and in the appropriate notification and response in the case of a breach.

Competition law

- Suppliers must adhere to anti-trust and other competition laws and regulations.
- Suppliers must always independently compete for business, set prices, and terms of purchase or supply to vendors and customers.
- Suppliers must never enter into illegal agreements with competitors that may restrict or distort competition, such as price fixing, market and customer division or bid rigging.
- Suppliers must never unlawfully provide, request, or discuss commercially or competitively sensitive information (Competitively Strategic Information).

Sanctions and Export Controls

- Suppliers must adhere to national and international sanctions and export control laws, in particular UN, US, EU, and UK, pertaining to business transactions with countries, companies and persons, and the transfer of goods and services, software or technology between countries and any re-exports.
- Suppliers must not engage with any sanctioned person or company in relation to any business dealings with Maersk.
- Suppliers must not provide any restricted services or goods that may involve Maersk.
- Suppliers must conduct due diligence when selecting suppliers of goods and services, software and technology to ensure compliance with sanctions and export control laws.

Conflict of interest

- Suppliers must adopt the highest standards of ethical behavior by preventing and avoiding any potential, actual or perceived conflicts of interest. Suppliers must take decisions based on objective criteria only. Any factors that might influence Suppliers' decisions due to private, business or other conflict of interest must be prevented. The same applies to relatives and other related parties.
- Suppliers must immediately disclose to Maersk any potential, actual or perceived conflict of interest.

Environment

We expect Suppliers to demonstrate commitment towards environmental protection by striving to minimize environmental impacts and, where material, proactively contribute positively to shared environmental and climate ambitions.

Environmental Compliance & Monitoring

- Suppliers must establish and enforce policies and procedures in adherence to local, national, and international environmental laws and standards in their operations and products.
- Suppliers must monitor and control significant environmental impacts and performance, ensuring compliance through training and operational controls.
- Suppliers must ensure that any work that requires a specific environmental license is only performed by individuals who are appropriately registered and/or licensed.
- Suppliers must maintain appropriate environmental records to demonstrate compliance with all requirements for environmental licenses and permits, including, but not limited to data from the monitoring of significant environmental impacts.
- Suppliers are encouraged to regularly assess and monitor nature-related impacts, dependencies, risks and opportunities relevant to the specific type and size of their operations, and where relevant, take mitigative action. We further encourage Suppliers to consider the impact on affected communities and engage with them appropriately.

Management of Hazardous Substances

- Suppliers must identify and manage substances that pose a hazard if released into the environment and comply with applicable labeling laws and regulations for recycling and disposal in an environmentally sound manner.
- Suppliers must display Material Safety Data Sheets (MSDS) for any hazardous or toxic substances used in its facilities and provide sufficient training to workers handling such substances.

Waste and Wastewater Management

- Suppliers must ensure proper management of wastewater and solid waste from operations and sanitation facilities according to local, national, and international laws, including segregation, monitoring, treatment, and record-keeping.
- Suppliers must stay well-informed and compliant with any regulations or changes thereto, pertaining to the labeling, storage, and disposal of waste.
- Suppliers must immediately notify site management, or Maersk project manager or supervisor, in case of spills or release of hazardous material into the environment, so that steps can be taken to correct, or control those conditions.

Air Emissions

- Suppliers must ensure that emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations are identified, monitored, controlled, and treated before discharge through regular air sampling as required by applicable local and national laws, and international standards.

Resource Use

- Suppliers are expected to utilize energy, materials and water resources efficiently and responsibly throughout all aspects of their operations. This includes minimizing waste, adopting sustainable practices and continuously striving to improve resource efficiency.
- Suppliers must make commercially reasonable efforts to recycle and reuse as much as possible, consistent with good industry practices and financial prudence.

Biodiversity & Ecosystems

- Suppliers are expected to undertake initiatives to protect and restore biodiversity and ecosystems within their operations and supply chains. We encourage Suppliers to actively engage in efforts

to conserve biodiversity by adopting sustainable land use practices, preserving natural habitats and supporting initiatives aimed at protecting endangered species.

- Suppliers are encouraged to minimize and ultimately avoid their presence in, and impact on, biodiversity-sensitive and protected areas and to strive to contribute to positive outcomes on biodiversity and ecosystems where material.

Climate Change

- Supplier shall consider setting greenhouse gas emissions reduction targets towards low emissions operations including reporting systems for the monitoring and disclosing of greenhouse gas emissions and reductions. Maersk recommends target setting methodologies in line with international standards, such as the Science Based Targets initiative (SBTi)¹². For Small and Medium-sized Enterprises (SMEs), Maersk recommends target setting methodologies in line with international standards, such as the SBTi SME target pathways¹³. Maersk recommends a 2040 target year to support the achievement of Maersk's committed net zero targets, with due consideration to relevant national and international climate ambitions.

¹² [Science Based Targets initiative \(SBTi\)](#)

¹³ [Science Based Targets initiative \(SBTi\), SME target pathways](#)

ALL THE WAY

A.P. Møller – Mærsk A/S
Supplier Code of Conduct
Effective as of 1 October 2024

