

**MEMO**

# **Code of conduct 2024**



## **Code of Conduct**

For Danish Ship Finance, compliance with rules and ethical standards is fundamental to the company's integrity. To ensure that we always work based on desirable behaviour, the company has developed and integrated a set of rules of conduct that all employees must familiarise themselves with and follow.

### **Purpose**

The purpose of the Code of Conduct is to guide employees in conducting business so that the company's reputation and integrity are preserved. In addition, the Code of Conduct helps employees maintain ethical behaviour in their daily decisions.

It is important that all employees are familiar with the Code of Conduct to prevent violations of its guidelines.

If an employee is unsure about a certain behaviour, they are obliged to consult with their department head, and department heads are responsible for ensuring that employees are aware of the rules.

### **Employees**

The company strives to create an attractive workplace through commitment, development and well-being. The company wants to ensure safe working conditions with relevant employee benefits and work-life balance. The company recognises diversity and wants to ensure that everyone can build a career on equal terms.

The best results are achieved when teams can use each other's skills, so it is important that all employees value and respect each other. The company does not accept any form of bullying or discrimination.

The company's anti-bullying policy states that it wants to promote good behaviour and a good working environment by focusing on human relations.

For the company, human relationships are at the centre of everything:

- Trust and confidence
- Righteousness
- Collaboration

### **Corruption and unusual gifts**

Danish Ship Finance distances itself from corruption and has developed an internal policy that all employees are obliged to follow.

The company has developed a set of guidelines for anti-corruption and unusual gifts:

- Acceptance or solicitation of bribes in any form by employees is not accepted,
- Employees can accept smaller gifts that are considered customary in the specific situation,
- The company only gives gifts that can be considered customary in relation to the specific situation.

### **Confidential information and inside information**

All employees have a duty of confidentiality with regard to non-public information about the company and its customers that they may become aware of through their work. The company has drawn up a policy for rules on the handling of internal knowledge and a policy for the processing of personal data. All the company's employees are obliged to familiarise themselves with and comply with the policy.

Employees may not hold Danish or foreign shipping company shares or other securities issued by shipping companies. Employees who hold Danish or foreign shipping company shares at the time of employment are generally required to sell these.

## **Conflicts of interest**

The company has internal procedures to prevent conflicts of interest between the company, members of the Board of Directors and the Executive Board.

Conflicts of interest can negatively impact the company's integrity and reputation, as well as the competence of its employees.

## **Whistleblower scheme**

The company wants to maintain a working environment that promotes the company's reputation. To ensure that employees do not withhold information that could affect the company's reputation, a whistleblower scheme has been established to which employees can anonymously report violations of financial regulation. A policy for processing personal data has been drawn up to ensure that reports are processed per the Personal Data Act.

If an employee is in doubt whether an observation should be reported or not, the company encourages reporting.

The whistleblower programme does not mean employees cannot use the company's communication channels. Employees can always approach the immediate manager or the Executive Board if the person becomes aware of violations or potential violations of internal and external rules.

## **Our customers**

The company wants to appear competent and trustworthy to customers. The aim is for customers to see the company as a stable and reliable source of borrowed capital. A good customer relationship is fundamental to the company, and great emphasis is placed on professional, honest and trustworthy communication.

## **Communication with authorities and the media**

The company wants to maintain a good relationship with the authorities. The company is open in its communication and is happy to enter into dialogue on matters that concern our areas of expertise. When it is deemed to have a positive impact on the company's business opportunities, dialogue is initiated.

The Executive Board handles communication with authorities and political decision-makers, which can, in specific cases, be delegated to employees with relevant competencies.

Upon request, the Executive Board can make statements to Danish and foreign media on topics related to the conditions for the company's activities.

Contact with the media is handled by the Executive Board or in special cases by the Chairman of the Board of Directors.

The Head of Sustainability & Research can comment to the media on market developments in the shipping markets.