SUPPLIER CODE OF CONDUCT



CLdN

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Introduction

CLdN is a leading provider of integrated quay-to-quay and door-to-door logistics solutions. Founded in 1928, CLdN ensures reliable, cost-effective transport that links the major economic areas of Europe. CLdN provides shortsea roll-on roll-off (RoRo) connections between the European continent, the United Kingdom, Ireland, Iberia and Scandinavia. CLdN's cargo and multimodal services have a Europe-wide reach using CLdN's extensive network of ships, terminals and equipment.

At CLdN our mission is "*to excel as an integrated provider of maritime links*".

CLdN is committed to being in full compliance with all local and international laws, rules and regulations wherever we operate. CLdN's Vision sets out CLdN's commitment to:

- prioritise the safety of all who work with us and invest in our colleagues' well-being and careers.
- reduce our environmental footprint through scale, technology and operational excellence.
- conduct our business based on clearly communicated principles.

This Supplier Code of Conduct complements CLdN's own internal Employee Code of Conduct in clearly communicating these business principles.

Through this Supplier Code of Conduct, we aim to promote responsible practices throughout our supply chain and to reduce risk to CLdN's own business and the reputation we have built over almost 100 years.

All CLdN suppliers should adhere to the standards set out in this document.

Human rights

As a CLdN supplier you should prohibit all forms of forced labour in your operations. You should not tolerate inhumane treatment of employees or contractors, including through any form of physical punishment or abuse. You should prohibit child labour in your operations and respect the internationally recognised minimum working age. You should comply with minimum wage standards and laws and adhere to the relevant working hours laws. You should uphold employees' freedom of association and the right to collective bargaining. Where security forces are used under your operational control, you should ensure appropriate oversight to prevent abuse, intimidation, or other human rights violations.

Health and safety

As a CLdN supplier you should ensure that health and safety measures to protect your employees are consistent with all applicable local and global legislation and that you have in place appropriate health and safety management systems and risk assessment processes. You should conduct regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures, including educating and training your employees and provide them with appropriate Personal Protective Equipment (PPE).

Non-discrimination and anti-harassment

As a CLdN supplier you should not tolerate any form of harassment, discrimination, bullying or disrespectful behaviour based on gender, religion, race, national or ethnic origin, cultural background, trade union affiliation, social group, disability, sexual orientation, marital status, age, political opinion, or any other inappropriate basis.

Environment and climate

As a CLdN supplier you should ensure compliance with all applicable legislation relating to the environment. You should have in place appropriate environmental risk assessment processes. You should seek continuous improvement in reducing the environmental impacts of your operations, products and services, including but not restricted to greenhouse gas emissions, other emissions to air, water and soil, waste and energy consumption/efficiency. You should carry out the necessary monitoring and measurements to accurately demonstrate your impact and performance. Where feasible, you should consider the use of renewable energy, via certified renewable energy contracts or on-site energy generation. You should on request make available to CLdN your relevant environmental information to permit CLdN's compliance with applicable reporting regulations and laws, including but not limited to CLdN's scope 2 and scope 3 emissions under the Greenhouse Gas Protocol (GHG Protocol).

Biodiversity, deforestation and land use

As a CLdN supplier, you shall comply with all applicable laws and recognised international standards relating to biodiversity protection, sustainable land use and the prevention of deforestation and forest degradation. You are expected to conduct your activities in a manner that supports the maintenance of ecosystems and avoids irreparable harm to natural habitats.

Land, forest, water rights and resource management

As a CLdN supplier, you shall respect land, forest and water rights when carrying out your activities and avoid forced eviction or the unlawful loss of land, forests or water resources. You shall also comply with applicable requirements on the responsible use of natural resources, including practices related to reuse, recycling and sustainable resource management, considering relevant regulatory developments.

Responsible chemical management

As a CLdN supplier, you are expected to take responsible chemical management into consideration in the conduct of your activities and to comply with applicable legal requirements. This includes giving due consideration to the life cycle of chemicals, such as their handling, storage and disposal, with the aim of reducing risks to health, safety and the environment.

Bribery and corruption

As a CLdN supplier you should not (whether directly or indirectly) offer or promise a benefit or anything of value with the intent to or the effect of improperly influencing a person to act in your favour. You should not request any person to make payments, promises or offers on your behalf

and never accept or receive bribes from government officials or private individuals. You should comply with all applicable laws and regulations to combat money laundering activities.

Conflicts of interest

As a CLdN supplier you should disclose to us any actual or potential conflict of interest related to your business with CLdN. A conflict of interest is a personal or financial interest, a business or personal activity or relationship, a prior or current employment, or any obligation that may interfere with your ability to objectively perform your contractual or job duties to CLdN or may impair your independence and objectivity. It typically includes, but is not limited to, relationships by blood or marriage, partnerships, or participations or investments in business partners or competitors.

Fair competition

As a CLdN supplier you should not enter into agreements that (directly or indirectly) restrict competition with competitors, suppliers or customers. This includes illegal practices such as price fixing, market sharing, bid rigging and abuse of market power.

International trade controls, regulations and sanctions

As a CLdN supplier you should ensure full compliance with applicable local, regional and international trade control laws, restrictions and sanctions that apply to your activities. You should ensure that you and your beneficial owners are not listed on any applicable trade sanctions list.

Money laundering and financial records

As a CLdN supplier you should maintain financial records and reports according to applicable laws and regulations. You should comply with applicable laws and regulations designed to combat money laundering activities.

Data Protection and disclosure of information

As a CLdN supplier you should adhere to applicable data protection legislation, including security of personal data, as well as regulations, e.g. GDPR, regarding personal data of customers, consumers, employees and shareholders. You should comply with all said requirements when personal data is collected, recorded, hosted, processed, transmitted, used or erased. You should also safeguard and make only appropriate use of confidential information, and not without our prior consent disclose any information that is not known to the general public.

Application of the Supplier Code of Conduct

CLdN reserves the right to verify a supplier's compliance with the terms of this Supplier Code of Conduct including through self-assessments and supplier audits either by CLdN or a third party. To support CLdN's efforts to demonstrate responsible practices in its supply chain, you should be able to provide information relating to your performance and continuous improvement measures in the areas covered by this Supplier Code of Conduct.

As a CLdN supplier, you should mandate compliance with the principles of this Supplier Code of Conduct across your value chain. You remain responsible for the conduct of your sub-tier supply chain and should ensure full adherence to these requirements at every level.

In case of breaches of this Code, CLdN will prioritise a process of dialogue and corrective actions. Without prejudice to any other contractual remedies, in the case of continuing material breaches or refusal to address a breach of the Code, CLdN may recourse to immediate termination of the contractual or commercial relationship in place.

CLdN values dialogue with its stakeholders. Suppliers are encouraged to share best practices and ideas which contribute to further improvements in the performance of all parties.



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