



BREMERLLOYD

T O G E T H E R A H E A D .

BREMERLLOYD



COMP- LIANCE

**DATE
NOVEMBER 17TH, 2017**

**REVISION
02,2022**

Contact:

Do you need more information or have any other concerns?

You can reach us by telephone or online and, if preferred, in an anonymous manner.

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Head of QHSE | Code of Conduct

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All information provided is handled confidentially. Speaking up is not always easy- that is why Bremer Lloyd does not allow any form of retaliation against anyone for making a good faith report.

Bremer Lloyd Code of Conduct on the internet:

www.bremer-lloyd.com/ueber-uns/compliance

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Introduction

The Bremer Lloyd Code of Conduct sets forth the basic standards of ethical and business conduct that are a central part of day-to-day business and must be followed by all directors and employees – in dealing with each other and in cooperation with customers and suppliers.

Since the principles listed below serve only as a guideline and do not describe a specific situation, advice should always be asked if there are uncertainties about correct behavior.

The Bremer Lloyd Code of Conduct complies with national and international statutory provisions and is based on international guidelines, including the Ten Principles of the UN Global Compact.

As the BL Code of Conduct is binding to the BL Group, Bremer Lloyd also expects its suppliers to support and work actively to comply with stated principles.

The following basic principles form the basis for our conduct:

- 1. Respect for Human Rights, Fair Labour & Occupational Safety – No Compromises**
- 2. Fair Competition – No Prohibited Cartel Agreements**
- 3. Business Integrity – No Corruption**
- 4. Separation of Corporate and Private Interests – No Conflicts of Interests**
- 5. Protection of Sensitive Data and Information – No Data Misuse**
- 6. Appreciation of Sustainability & Environmental Protection – No Waste of Resources**

Fundamental Requirements

Bremer Lloyd always complies with all applicable local, national, and international laws, regulations, and commitments wherever we do business.

Correct Reporting and Accounting

It is ensured that all data, information, and documents prepared or signed by Bremer Lloyd are correct. This includes, for example, annual reports, expense report data, or the E-mails we send.

Compliance with Bremer Lloyd's Principles

This Code of Conduct applies to everyone working with or for Bremer Lloyd, meaning not only the management and employees but also business partners and suppliers.

Bremer Lloyds managers bear a special responsibility in this context: they are role models and must prevent non-compliant behaviour within the Company, protect their employees and conduct themselves with integrity both within the Company and externally. Violations of the Code of Conduct will not be tolerated, and consequences are to be expected.

It is vital for the Bremer Lloyd team to familiarize themselves with the Code of Conduct, to integrate it into their behaviour, and bear it in mind when making decisions.

When in doubt, the immediate manager should always be consulted. Management is always available for further guidance and support. The Code of Conduct is the basis for an ethical and respectful work environment and staying true to its principles is crucial to Bremer Lloyd's success. This is being based on the trust of employees, customers, and business partners.

1. Respect for Human Rights, Fair Labour, and Occupational Safety– No Compromises

The basis of a good working atmosphere and good cooperation is treating each other respectfully. The working environment is characterized by respect, understanding, and tolerance. Nobody is disadvantaged or discriminated against because of gender, ethnic origin, religion, culture, political opinion, world view, disability, or age. Likewise, none of these characteristics influence personnel decisions. Qualifications, experience, and social skills are the only criteria when hiring staff. All employees have equal rights and opportunities based on competence, experience, and performance.

The Company ensures that the health and safety of employees are always protected and provides occupational safety in line with the provisions of national regulations. Bremer Lloyd is committed to promoting employees' health and job satisfaction through continuous improvements. All employees are obliged to inform the HR department of any potential source of danger so that it can be eliminated immediately. Working under the influence of alcohol or other drugs will not be tolerated.

2. Fair Competition- No Prohibited Cartel Agreements

The BREMER LLOYD Group's policy is to comply with all applicable antitrust, competition, and fair-trade laws. Attention is paid to compatibility with antitrust law and other regulations when drafting contracts, tenders, and procurement procedures and obtaining market information.

3. Business Integrity – No Corruption

Bremer Lloyd advocates emphatically for fair competition and cooperates only with business partners who adhere to Bremer Lloyd's Code of Conduct. The Bremer Lloyd Group competes and does business transparently. Our businesses are based exclusively on high-quality services and competence, and we do not tolerate any form of corruption or bribery. Improper payments, donations, or gifts are not allowed. Employees of the Bremer Lloyd Group shall not be open to any bribery and shall not draw any personal benefits from their activities.

When gifts are exchanged as an appreciation of good business cooperation, attention should be made to the possible perception of the other person or a third party.

When an employee considers offering or receiving gifts, it must be transparent and documented; it shall not be excessive in type or value or offered/ received too frequently and must not influence or risk affecting the recipient's behaviour or decision.

If there are doubts about giving or accepting gifts, employees are obliged to get advice from their manager.

The transparent way the Company operates makes it possible to immediately identify, verify, and, if necessary, initiate legal actions in the case of an alleged case of abuse.

4. Separation of Corporate and Private Interests – No Conflict of Interests

Business decisions must be made on an informed basis, in good faith, and with the honest belief that the action taken is in the best interest of Bremer Lloyd. Business decisions will not violate any applicable law, regulation, or internal rule or policy.

The decisions to be taken are made within individual authority levels given by Bremer Lloyd. Any conflict between private and business interests is to be avoided. Bias in favour of a supplier or service provider without an objective reason must be avoided. It is not tolerated to use one's position within the Bremer Lloyd Group unjustifiably for one's benefit or the benefit of family members or close persons. In case of a conflict situation, immediate clarification has a top priority.

5. Protection of Sensitive Data and Information – No Data Misuse

Insecure IT systems seriously threaten proper business operations. To adequately protect the sensitive data and information of business partners and customers, the continuous monitoring of the IT infrastructures requires particular attention. Security measures such as appropriate passwords, licensed software, and the latest anti-virus software are essential.

In addition, every employee is obliged to treat company-related information confidentially and not to pass it on to third parties. This includes documents, contracts, statistics, financial data, intellectual property, and new business ideas. Likewise, discussing confidential information in public is not permitted.

Bremer Lloyd protects the personal data of employees, former employees, customers, suppliers, and other affected parties. Moreover, Bremer Lloyd collects, gathers, processes, uses, and stores personal data strictly in accordance with legal provisions.

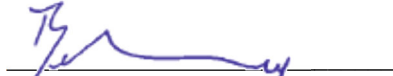
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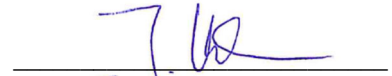
Bremer Lloyd Group is aware that all raw materials are only available to a limited extent and that we all have a responsibility towards future generations. Therefore, Bremer Lloyd is committed to the creation of a more sustainable society and is steadily working on reducing its environmental impact and strives to utilize resources efficiently.

Every employee is asked to use resources and energy economically and efficiently, including minimizing waste and reusing or recycling material as far as possible. Even seemingly small and easy measures can have, in totality, a large overall impact, like reducing paper consumption to a minimum by only printing when necessary or keeping power consumption as low as possible. As well as switching off the computer and other devices before heading home and when leaving the office.

This document describes the Compliance of Bremer Lloyd and is hereby approved and put into effect.

Bremen, February 2022



Frank Behrens [Managing Director]

Jakob Halm [Managing Director]