



#### INTRODUCTION

Our Code of Conduct describes the minimum level of acceptable behaviour for Danske Fragtmænd's employees and business partners\*. Everyone working at or for Danske Fragtmænd is responsible for acquiring knowledge of and complying with Danske Fragtmænd's policies and guidelines.

All employees and business partners must also follow the Code of Conduct concerning issues not explicitly described in the Code. The following questions can be used as a guide in situations where the content of the Code of Conduct is not adequate.

- Is my action legal, ethical, and moral?
- Will my action or the consequences of it harm
  Danske Fragtmænd if the public finds out about it?
- Will my colleagues, Danske Fragtmænd's customers, owners or other stakeholders agree with my actions?

If you are unsure whether your decision complies with the Code, you can always contact your immediate manager, Danske Fragtmænd's Legal Department or the HR Department.

We expect all employees and business partners to comply with applicable laws and regulations.

# REPORTING VIOLATIONS OF THE CODE OF CONDUCT

Employees must report violations, and suspected violations, of the Code of Conduct to their immediate manager. It is also possible to report via Danske Fragtmænd's whistleblower scheme, which is available in our employee app and at <a href="https://www.fragt.dk/jura/whistleblower/">www.fragt.dk/jura/whistleblower/</a>.

## **SANCTIONS**

Violations of the Code of Conduct may result in disciplinary action. For employees, this could be in the form of employ-

ment law consequences such as suspension or termination, while for business partners, it could mean termination of the business relationship. Danske Fragtmænd may also consider legal action.

#### **BUSINESS ETHICS**

Danske Fragtmænd fundamentally rejects unethical and corrupt business behaviour.

# **BRIBERY AND CORRUPTION**

Danske Fragtmænd does not tolerate any form of bribery or corruption. Employees and business partners representing Danske Fragtmænd must not act in a way that is or can be perceived as an attempt to influence decisions in an unethical manner. It is not permitted to solicit, accept, offer, or promise the payment of bribes or inappropriate gifts, favours and other benefits.

## CONFLICTS OF INTEREST

Business decisions must always be made on an objective basis and must not be influenced by personal interests. A conflict of interest is any circumstance that may cast doubt on Danske Fragtmænd's, as well as the ability of employees and business partners ability to act objectively when making a business decision. If there is a risk of a conflict of interest, the employee must notify their immediate manager.

# FINANCIAL CRIME AND MONEY LAUNDERING

Danske Fragtmænd does not tolerate financial crime. Employees and business partners acting on behalf of Danske Fragtmænd shall not channel funds to or support illegal activities (e.g., terrorism, tax evasion, fraud) or conceal, acquire, use, or possess the proceeds of illegal activities.

#### DATA ETHICS AND PERSONAL DATA

We process personal data at Danske Fragtmænd, which is why we pay special attention to information security and the processing of personal data. We train our employees to process personal data and other confidential material correctly, and we work according to internationally recognised security standards, including ISO 27001 on information security.

Danske Fragtmænd has a Data Ethics Policy, which, together with our guidelines for 'Information security and processing of personal data', is available on our website.

# POLITICAL CONTRIBUTIONS AND ACTIVITIES

Danske Fragtmænd is neutral towards political parties and candidates. Political lobbying is conducted as part of legitimate business activities in a transparent manner and in accordance with international treaties and national laws.

# **FAIR COMPETITION**

We value and are committed to upholding the principles of fair competition in all our business activities. We compete in a legal, honest and ethical manner and refrain from any form of anti-competitive behaviour, including cartelisation, price fixing, market sharing or any other illegal practices that may harm the market or competitors.

### FINANCIAL REPORTING

We are committed to maintaining high standards of accounting and financial reporting. Our accounting and financial information must be accurate, timely and in compliance with applicable laws, regulations and accounting standards.

We will follow the principles of good accounting practice and avoid any manipulation, misuse or misrepresentation of financial data. All transactions must be properly documented and comply with internal policies and procedures.

# EMPLOYEES AND WORKING CONDITIONS

Our employees are our most important resource at Danske Fragtmænd, which is why we work to ensure a good working environment that focuses on the health and safety of our employees, both physically and mentally.

### CHILD LABOUR AND FORCED LABOUR

Danske Fragtmænd does not tolerate or use any form of child labour or forced labour.

# TERMS OF EMPLOYMENT AND FREEDOM OF ASSOCIATION

Danske Fragtmænd will not contribute to social dumping and exploitation. Our employees have pay and employment conditions that are in accordance with applicable legislation and collective labour agreements. Danske Fragtmænd ensures that all employees know their terms of employment and that legally binding agreements have been drawn up for all employment relationships.

The Danske Fragtmænd Group is organised in the Confederation of Danish Industry and ATL, and we work for good collaboration with the trade unions. Of course, we also respect our employees' right to organise themselves in a trade union, and we do not get involved in their choice.

# **HEALTH AND SAFETY**

Health and safety are high on the agenda at Danske Fragtmænd. Our employees work in a physically demanding environment with means of transport daily. It poses a risk to the health of our employees. Therefore, we have a particular focus on avoiding and preventing workplace accidents. It is of great importance to Danske Fragtmænd that our employees have access to the information they need to perform their work safely and to be well informed, which is why we have an employee app that all employees can access from their mobile phones or computer. In the app, they can find everything from the safety rules at our terminals to proper lifting techniques.



Our well-functioning Health and Safety Organisation regularly holds meetings and follows up on the health and safety challenges we identify. We coordinate across locations and share knowledge and experience.

Danske Fragtmænd has a policy for working with dangerous goods. We have our own safety advisers, and everyone who works directly with dangerous goods has an ADR certificate, while others who are involved in the area receive a shorter introductory course.

# **DIVERSITY**

We want to be a diverse workplace at Danske Fragtmænd representing the society we are surrounded by. It is not just a matter of being socially responsible; we believe it helps drive business development and growth. There is room for everyone regardless of gender, sexuality, age, ethnicity, and religion at Danske Fragtmænd.

Danske Fragtmænd also recruits employees who do not have a 100 % ability to work, which applies to employees in flex jobs and Section 56 schemes, as well as unemployed people with pay subsidies. Employees employed on special terms are a valuable labour force for Danske Fragtmænd and, like our other employees, contribute positively to the company.

## **EQUAL OPPORTUNITIES**

Danske Fragtmænd respects equal opportunities and fights against discrimination in the workplace. As a company, we are committed to gender equality in terms of career opportunities and pay.

We compensate our employees according to qualifications, responsibilities, and the nature of the work, regardless of gender. Furthermore, we ensure that all job adverts are gender-neutral and appeal to both men and women.

# **ENVIRONMENT**

We work purposefully at Danske Fragtmænd to reduce the environmental impact of the company's activities and processes, and our goal is to be carbon neutral by 2050. We involve the company's stakeholders in the work to transform Danske Fragtmænd into a greener, financially sustainable organisation. Danske Fragtmænd expects employees and business partners to promote environmental initiatives in their daily work to fulfil its environmental targets. Danske Fragtmænd reports on our environmental impact and environmental efforts in the annual sustainability report.

\*Business partners are companies (and their employees) or individuals who, as subcontractors, work for or with Danske Fragtmænd or supply goods or services to Danske Fragtmænd.





