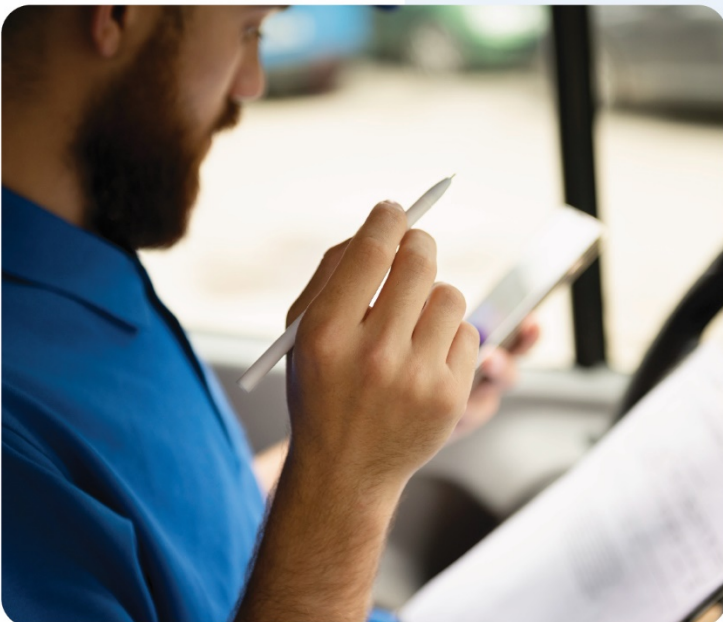




**LEMAN** 

# **LEMAN** **People Code of** **Conduct**



**Proudly  
driven  
by people.**

# LEMAN People Code of Conduct

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## A message from René

Dear Colleagues,

At LEMAN, we are dedicated to upholding the highest standards of integrity and professionalism in everything we do. Our strong reputation is built on the trust and respect we garner from our customers partners, and each other. It is our collective responsibility to uphold these values in every action we take.

Our Code of Conduct serves as our guiding compass. It outlines the principles and standards that shape our behaviour, ensuring consistent honesty, fairness, and transparency. Following this Code is not just about legal compliance; it is about fostering a culture of ethical excellence and accountability.

As we navigate the complexities of our industry, let us remain unwavering in our adherence to these standards. Each of us has a role to play in upholding the Code of Conduct, and together, we can create a workplace where ethical behaviour is the norm and not the exception.

I encourage you to read and understand the Code, and to apply its principles in your daily work. If you encounter a situation where the correct course of action is unclear, please seek guidance. Our leadership team is always available to assist you in making ethical decisions.

Thank you for your dedication to our company's values and your steadfast commitment to integrity. By working together, we can ensure that LEMAN continues to be a place we are all proud to be a part of.

Sincerely,

René Bach Larsen  
CEO



# Our values

## The LEMAN Way: Straight talk on navigating complexities

Here at LEMAN, we stick to three guiding lights: Respect, Quality, and Commitment.

### RESPECT

But let's cut through the usual jargon. When we talk about respect, it's not just lip service. It means genuinely valuing each handshake, email, and cargo load, treating every interaction as more than just transactions.

### QUALITY

Quality? Sure, everyone says they've got it. But for us, it's about sweating the small stuff, so you don't have to. It's the behind-the-scenes grind, ensuring your goods move seamlessly from A to B, because we know the devil is in the detail.

### COMMITMENT

And commitment? Yes, it's a promise to go the extra mile, but it's also about being real when challenges pop up. We're not here to pretend logistics is all smooth sailing. Instead, we're committed to navigating the rough waters with you, finding solutions where others might see dead-ends.

That's the LEMAN way – no fluff, just honest, thorough work to make things happen, because at the end of the day, that's what really moves mountains, or in our case, your cargo. And we do it keeping our three guiding lights in mind.



## Our Code

At LEMAN, we aim to be global people – first challenger of logistics. We are all about being good ambassadors for our company and doing things the right way. We are dedicated to delivering quality and always looking for responsible solutions. By following all laws and regulations, we are making a real impact on the world. Let us make a difference together!

We expect everyone at LEMAN to act ethically, follow the law and we have zero tolerance for any illegal or unethical behaviour. If you see anything that is not right, let us know through our whistle-blower hotline. Together, we can keep LEMAN a great place to work.

### Who has to comply with our code

At LEMAN, we always play by the rules and expect our people and partners to do the same. Our Code of Conduct applies to everyone in our organization, and our affiliates and partners. We want everyone to act ethically and legally, and this policy is a guide to help us do that. So, let's have fun, but always do the right thing!



## Anti- Corruption

At LEMAN, we believe in keeping things fair and square. We follow all applicable laws and expect everyone associated with LEMAN to do the same.

A few examples of things we don't tolerate are offering bribes to officials, giving fancy trips to customers, paying intermediaries to speed up permits, securing jobs for customers' family members in exchange for business, and making political contributions.

### Bribery and Corruption

We have a zero-tolerance policy for any shady business practices like bribery, kickbacks, or illegal payments.

### Facilitation Payments

In rare cases where the health or safety of individuals is at risk, we will make an exception for "facilitation payments" or "grease payments" but we will keep track and report them.

### Gifts, hospitality, entertainment

We do allow reasonable charitable contributions with approval from the country manager and Group CEO. It is okay to offer or accept gifts, hospitality, and entertainment as long as they are not excessive, lawful and appropriate in the local context. If you are ever unsure, just reach out to your manager for guidance.

And if we are the ones doing the entertaining, a LEMAN colleague will always be present. Any travel costs provided to a customer or other third party must be directly related to existing business and approved by the country manager.

### Conflict of interest

We expect our people to not use their position at LEMAN for personal gain and to avoid any conflicts of interest. If you ever find yourself in a tricky situation, let your manager know right away.

**SAY NO TO  
CORRUPTION**



## Employment Practices

### Health & Safety

At LEMAN, keeping our team safe and healthy is a top priority. We follow all safety regulations and make sure to protect against any potential hazards. We treat all LEMAN colleagues with respect and provide a fun, safe work environment. Plus, we ensure all team members working with dangerous goods are fully trained and certified.

### Labour Practices

#### Child Labour and Forced Labour

We never condone the use of forced or involuntary labour and respect applicable laws and international standards prohibiting child labour and forced labour.

#### Freedom of association and Collective Bargaining

We support our colleagues' right to establish, form and participate in trade unions. Workers shall be able to bargain individually as well as collectively for conditions according to provisions in national legislation.

#### Fair treatment

We treat all our people with respect and fairness. We follow all laws and international standards related to human rights and ensure that all our partners do the same. We believe in treating everyone with dignity and respect.

#### Wage and Benefits

We believe in fair pay for all. We ensure all LEMAN colleagues receive at least the minimum wages, medical benefits, and pensions required by law or agreements. We also strive to make LEMAN a desirable workplace by staying competitive with industry standards.

#### Working Hours & Holiday

We make sure our colleagues have clear, written agreements on working hours, overtime, and vacation time that comply with local laws and regulations. We also ensure that these agreements meet the standards of LEMAN and any relevant agreements.

### **Diversity, Inclusion and Non-Discrimination**

We believe in a workplace where everyone is treated with respect and dignity, and we do not discriminate or harass based on any personal characteristic. We follow all laws against discrimination and support human rights. If you ever feel uncomfortable or have any concerns, please let management know – we will not tolerate retaliation against you.

### **Duty of Care**

At the heart of our organization lies a profound commitment to each other's well-being. We recognize that our greatest strength comes from our people, and with that comes a shared responsibility to care for one another.

Whether it's lending a hand during a busy project, offering a listening ear when someone needs to talk, or simply being mindful of the diverse experiences and backgrounds we each bring to the table, our duty of care is about creating an environment where everyone feels valued and supported.

Remember, your actions have the power to brighten someone's day or make their work a bit easier. Let's be kind, considerate, and compassionate in all our interactions, fostering a culture where empathy and mutual respect thrive.

Together, we build a workplace that is not just functional, but also joyful and nurturing.

### **Anti-Harassment and Anti-Bullying**

We believe in a workplace where everyone feels safe and respected. That is why we do not tolerate any physical, psychological, or verbal harassment or bullying. We prohibit offensive or sexual conduct, or anything that's based on any characteristic that is protected by law. We recognize that harassment can take many forms and it can be a single incident or a pattern of behaviour that creates a hostile or offensive work environment. Such behaviour, if founded is a serious offense and will result in disciplinary action up to and including dismissal.

All LEMAN colleagues will be held responsible and accountable for avoiding or eliminating prohibited conduct. If you ever feel uncomfortable or have any concerns about harassment or discrimination, please let your manager or the People Team know. We will investigate it promptly and keep everything confidential.

### **Confidentiality**

We understand the importance of maintaining confidentiality when dealing with harassment, discrimination, or bullying cases. We'll do our best to keep things private and handle them discreetly. However, if someone breaks confidentiality, they will face consequences.



## Environmental Protection

LEMAN is dedicated to complying with all relevant local, national, and international environmental laws and regulations, ensuring that our practices meet or exceed regulatory standards. By fostering a culture of sustainability, we aim to not only preserve natural resources for future generations but also to lead by example in our industry and community, promoting awareness and collaboration on environmental issues.

### Reduce our environmental footprint

We strive to minimize our environmental footprint by utilizing cleaner technologies in transportation, optimizing our routes, streamlining operations, and partnering with local authorities and customers to provide the most environmentally friendly services possible.

### Employee participation

All LEMAN colleagues are expected to contribute our goal to reduce our environmental footprint by using resources such as energy more efficiently and by actively participating in waste reduction initiatives, including recycling and reusing materials whenever possible.

LEMAN colleagues are also encouraged to engage in environmental training programs and suggest ideas for further reducing our environmental footprint.

### Continuous improvement

We believe that continuous improvement and innovation are essential to enhancing our environmental performance. Therefore, we regularly set and review environmental objectives, monitoring our progress transparently.

### Expectations from our partners

We expect all our affiliates, including third-party suppliers and business partners, to comply with all relevant environmental laws and regulations and to continually seek ways to minimize their environmental impact.

## Third Party Relationships

LEMAN upholds ethical behaviour, integrity, and transparency in all our operations, and we hold our third-party partners to the same standards. They are required to adhere to all relevant local, national, and international laws and regulations while working with us, including those pertaining to labour, environmental protection, health and safety, and anti-corruption.

We expect our third-party partners to conduct their business ethically and with integrity. They must respect human rights within their workforce and supply chains and ensure a safe and healthy working environment for their colleagues.

They are obligated to report any suspected violations of this Code of Conduct or any unethical behaviour through LEMAN's whistleblowing system.

## Data Ethics and Privacy

LEMAN is dedicated to upholding the highest standards of data ethics and privacy for personal, customer, and supplier data. All colleagues are expected to handle such data with the utmost care, ensuring compliance with applicable data protection laws and regulations, including the EU General Data Protection Regulation. Colleagues must collect only the minimum amount of personal data necessary, ensuring that data collection practices are lawful, relevant, and transparent. For both personal and customer data, it is essential to clearly inform individuals about how their data will be used and obtain explicit consent where required. Privacy notices must be accessible and understandable, ensuring that all stakeholders are fully aware of their rights and the LEMAN's data handling practices.





To protect personal, customer, and supplier data, all LEMAN colleagues must implement robust security measures, including strong passwords, encryption, and secure access controls. In the event of a data breach involving personal, customer, or supplier data, colleagues are required to report incidents immediately to the designated data protection officer or team. We will promptly investigate and address breaches, including notifying affected individuals and regulatory authorities as necessary, to mitigate any potential harm and maintain trust. By adhering to these standards, we strive to protect the integrity and confidentiality of all data we handle, fostering a culture of trust and responsibility.

## Reporting Wrongdoing

We are committed to maintaining a fair, transparent, and safe environment for everyone. This means ensuring everyone feels empowered to speak up about issues without fear of retaliation. Whether you are addressing a personal grievance or reporting a concern that affects the broader integrity of our organization, here is how you can step forward.

### Got a complaint or a concern?

The first step is always to try and settle it directly with the people involved. If this is unsuccessful the next step is to chat with your manager. We are all about resolving things in a low-key way whenever possible.

We have two more formal solutions for you to report through:

### 1. Grievance process

Grievance includes personal disputes, concerns about workplace conduct, or specific issues with colleagues or management. This process is a step-by-step procedure where you can raise a concern, seek mediation or a review, and receive a resolution. This process is meant to be approachable and straightforward to encourage you to come forward with personal work-related issues. The process is not put forward anonymously.

### 2. Whistleblower

The purpose of a whistleblower system is for reporting unethical behavior, illegal activities, or other misconduct that goes beyond personal grievances and may significantly impact the integrity of LEMAN. You can choose to make reports anonymously (or not). The whistleblower platform is also available for our customers, partners, and suppliers.

#### Ensure Safety and Anonymity

Recognize that your courage in coming forward is protected. You can choose to remain anonymous if you prefer, using our dedicated whistleblower reporting tool, which is handled jointly by the Group CPO, Group CFO and Group CEO.

#### Use the Right Channel

Submit your report through our designated whistleblower platform, which is designed to protect your identity and the information provided. You can find this on our website.

**Initiation of investigation**

Upon receipt, a special committee outside of regular management chains (possibly including external advisors) will review your report. This ensures impartiality and thoroughness.

**Protect and Prevent**

While the investigation proceeds, measures will be put in place to protect you and any involved parties from retaliation. We will also review our practices to prevent future misconduct.

**Outcome and Actions**

You will receive feedback about the progress and outcome of the investigation. Even if anonymous, you can check the status through a secure system assigned to your report.

