

LEMAN

Customer Code of Conduct

Proudly
driven
by people.



LEMAN Customer Code of Conduct

Table of Contents

Introduction..... 3

Scope and compliance..... 3

Speaking up and reporting concerns..... 3

Business ethics..... 4

Human rights and labour standards..... 4

Health and safety..... 5

Environment and climate..... 5

Transport, cargo and trade compliance..... 5

Information security and data protection..... 6

Implementation and consequences..... 6

Introduction

At LEMAN, we are committed to conducting business with integrity, transparency and respect for people and the environment. Responsible business practices are essential to building resilient supply chains and trusted long-term relationships.

This Customer Code of Conduct (the “Code”) sets out the principles and standards we expect customers to uphold when purchasing or using LEMAN’s services and when interacting with LEMAN, our colleagues and the parties involved in delivering our services. We recognise that customers may maintain their own equivalent standards. Our aim is to establish a clear and consistent foundation for responsible cooperation.

Scope and compliance

This Code applies globally to all customers that purchase or use services from LEMAN. It covers activities connected with the business relationship, including information, goods and instructions provided to LEMAN.

Customers are expected to comply with all applicable laws and regulations and with the principles in this Code. Where applicable law and this Code address the same subject, the stricter requirement should be followed unless prohibited by law. Customers should also take reasonable steps to promote equivalent standards among their employees, contractors and other parties acting on their behalf in connection with LEMAN services.

If a Customer becomes aware of an actual or potential breach connected with the relationship, the Customer should inform LEMAN promptly and cooperate in assessing and addressing the matter.

Speaking up and reporting concerns

Customers are expected to maintain appropriate channels through which employees and other relevant individuals associated with their operations can raise concerns in good faith and without fear of retaliation.

Concerns relating to LEMAN, our services or conduct connected with the business relationship may also be reported through LEMAN’s designated whistleblower channel available on LEMAN’s website. Reports should be made honestly and with sufficient information to support appropriate follow-up.

Business ethics

Customers are expected to:

- prohibit bribery and corruption, including offering, promising, requesting or accepting anything of value to improperly influence a decision or obtain an advantage;
- prohibit facilitation payments and maintain accurate books, records and supporting documentation;
- compete fairly and comply with applicable antitrust and competition laws;
- avoid actual or potential conflicts of interest in dealings with LEMAN and disclose them promptly if they arise;
- ensure gifts, hospitality and entertainment are modest, infrequent, lawful and never intended to improperly influence a business decision;
- respect intellectual property rights and protect confidential or proprietary information received from LEMAN or other parties;
- comply with applicable laws against fraud, money laundering, tax evasion and other financial crime; and
- provide complete and accurate information relevant to the services requested from LEMAN.

Human rights and labour standards

Customers are expected to respect internationally recognised human rights and to:

- prohibit child labour, forced labour, bonded labour, modern slavery and human trafficking;
- provide lawful and fair remuneration, benefits and working hours, including overtime;
- respect workers' rights to freedom of association and collective bargaining in accordance with applicable law;
- maintain a workplace free from discrimination, harassment, abuse and retaliation;
- provide fair treatment and equal opportunity irrespective of characteristics protected by applicable law; and
- take reasonable steps to identify and address adverse human rights impacts linked to their operations and business relationships.

Health and safety

Customers are expected to:

- provide a safe and healthy working environment and comply with applicable occupational health and safety requirements;
- identify, assess and control workplace hazards and maintain appropriate emergency preparedness procedures;
- provide relevant training, equipment and instructions to employees and contractors;
- ensure that premises, loading areas, goods, packaging and equipment under their control do not expose LEMAN personnel or other parties to avoidable risk; and
- report safety-critical information and incidents promptly and cooperate on corrective action.

Environment and climate

Customers are expected to:

- comply with applicable environmental laws, permits and standards;
- use energy, water and raw materials efficiently and prevent pollution where reasonably possible;
- manage waste and hazardous substances safely and responsibly, prioritising reduction, reuse and recycling;
- measure and work to reduce material greenhouse gas emissions and other relevant environmental impacts;
- provide accurate information needed to calculate, document or report the environmental impact of service;
- avoid misleading environmental claims and ensure sustainability statements are supported by appropriate evidence; and
- cooperate with LEMAN, where relevant, to identify practical opportunities for lower-emission transport and more efficient logistics.

Transport, cargo and trade compliance

To support safe and lawful logistics operations, Customers are expected to:

- provide timely, complete and accurate shipment data, instructions and documentation, including cargo description, value, origin, destination, weight and classification where relevant;

- identify dangerous goods, controlled goods, dual-use items, waste and other regulated cargo before booking and comply with all packaging, marking, labelling and documentation requirements;
- comply with applicable customs, import and export control requirements, trade sanctions and embargoes;
- ensure that goods tendered for transport are lawful and appropriately packed, secured and declared;
- not use LEMAN services for unlawful activities, prohibited goods, sanctions evasion or concealment of the true nature, origin, destination or parties to a transaction; and
- cooperate promptly with reasonable compliance checks and requests for supporting information.

Information security and data protection

Customers are expected to:

- comply with applicable data protection and privacy laws;
- process personal data lawfully, fairly and only for legitimate purposes;
- maintain appropriate technical and organisational measures to protect information and systems against loss, misuse, unauthorised access and cyber incidents;
- share only the personal and confidential information necessary for the relevant purpose;
- notify LEMAN without undue delay of any incident that may affect LEMAN information, systems, services or individuals; and
- respect agreed requirements concerning confidentiality, retention, deletion and permitted use of information.

Implementation and consequences

LEMAN supports constructive dialogue and continuous improvement. If concerns arise, LEMAN may request information or reasonable cooperation to understand the issue and agree proportionate corrective actions.

Material, repeated or unremedied breaches of this Code may affect the business relationship and may lead to suspension or termination, subject to applicable agreements and law. Nothing in this Code replaces or limits contractual terms, legal obligations or LEMAN's rights and remedies.