



**Supplier Code of Conduct**  
**VERSION 1.0**  
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**VERSION**

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## 1. STATEMENT

This is a Hafnia policy drafted in accordance with the BW Group's Supplier Code of Conduct policy.

BW Group's mission is *Delivering energy for the world today and finding solutions for tomorrow*. As part of this mission, we are committed to working with and supporting our suppliers, subcontractors, agents or other third parties (Suppliers) to maintain a resilient and sustainable supply chain in the maritime industry.

This "Supplier Code of Conduct" reflects our minimum standards for Suppliers with respects to (i) *Human Rights & Employment Practices*, (ii) *Health, Safety, Environment & Quality*, and (iii) *Business Conduct & Ethics*. It is based on the [United Nations Global Compact's Principles](#) and we expect Suppliers to make efforts to operate by the [United Nations Guiding Principles on Business and Human Rights](#).

*The Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, Suppliers must first adhere to applicable laws and regulations and the existing contract terms, followed by the principles in this Supplier Code of Conduct.*

## 2. OUR RELATIONSHIP

### Expressions of Concern

We encourage open discussions about responsible conduct and expect Suppliers to provide their employees with avenues for raising legal or ethical issues without fear of retaliation. We encourage any individual or organisation to raise a query or concern, as well as report possible violations or breach of this Supplier Code of Conduct through the [BW Group/Hafnia's Whistleblowing hotline](#).

We confirm that no retaliation will be taken against any of our Suppliers or their employees for raising any concern, questions or complaints in good faith and all reports of suspected violations will be treated confidentially. Reviews and investigation will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing). All investigations will be documented and if needed will be reported to the relevant authorities.

### Collaborations with Suppliers

We believe the buyer and supplier relationship could create significant value and help supply chains become more sustainable and resilient. We encourage Suppliers to [reach out to their group representative](#) to discuss possible opportunities where we could assist or collaborate with Suppliers on strategic alignment or cross-functional engagement initiatives within the supply chain.

## 3. SUPPLIER CODE OF CONDUCT

### A. HUMAN RIGHTS & EMPLOYMENT PRACTICES

We treat people with respect and dignity, encourages diversity, remains receptive to diverse opinions, promotes equal opportunity for all and fosters an inclusive, ethical culture.

#### Human Rights & Employment Practices

We support the [United Nations Universal Declaration of Human Rights](#) and the [International Labour Organisation Declaration on Fundamental Principles and Rights at Work](#). Suppliers should:

- comply with all applicable laws, regulations and international standards related to labour practices and protection of human rights;
- support and respect the protection of internationally proclaimed human rights;
- ensure that they are not complicit in human rights abuses;
- uphold the freedom of association and the effective recognition of the right to collective bargaining;
- ensure that of all forms of forced and compulsory labour and child labour is not used in their performance of work; and

- establish fair disciplinary, grievance and termination procedures.

### **Inclusion & Diversity/ Harassment**

We are committed to diversity and inclusion and promoting a positive work environment at sea and onshore. The collective sum of individual differences, life experiences, knowledge, capabilities and talent constitute our culture. We embrace differences in age, ethnicity, family relationships and all other characteristics that make our employees unique. Suppliers should:

- ensure equal treatment and refrain from discrimination in any form; and
- ensure that their employees are afforded an employment environment that is free from physical, psychological and verbal harassment or abusive conduct.

## **B. HEALTH, SAFETY, ENVIRONMENT & QUALITY**

### **Health & Safety**

We are committed to a safe working environment.<sup>1</sup> We do this through a culture of constant communication, active sharing of best practices, learning from near-miss incidents and numerous other safety tools and processes. We aim to ensure that every employee, both on shore and at sea, can work in the safest work environment possible across our operations. Suppliers should:

- ensure compliance with applicable laws, regulations and our requirements with respect to health and safety;
- implement effective occupational health and safety management systems;
- continuously identify health and safety risks in all operations to improve safe working practices;
- continuously provide relevant training on health and safety systems to their workers;
- empower workers to report unsafe practices without fear of reprisal; and
- proactively undertake safety initiatives to protect people and assets from harm and damage.

### **Environment**

We wish to reduce the environmental impact of our current business and investing in renewable technologies that support a sustainable economy. Suppliers should:

- adhere to all relevant local and national environmental laws;
- obtain and maintain all the necessary environmental permits, approvals and registrations;
- encourage the development and diffusion of environmentally friendly technologies and environmental management systems within their processes and operations and across the supply chain;
- commit to monitoring, documenting and improving the environmental impact regarding design, manufacturing, packaging and delivery of the goods or services they provide; including the use of environmentally-friendly packaging and materials where possible;
- support a precautionary approach to environmental challenges in their operations;
- implement effective environmental management systems and solutions (ISO 14001 or equivalent); and
- undertake initiatives to protect the environment.

### **Quality**

Suppliers must take due care to ensure their products and services meet all required quality standards. Suppliers should:

- have a documented quality assurance processes and systems (ISO 9001 or equivalent) to identify defects and implement corrective actions; and

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<sup>1</sup> BW Group: <https://bw-group.com/sustainability/zero-harm/>

- continuously seek to improve their products or services and operations with a focus on the environment, sustainability and quality.

### C. BUSINESS CONDUCT & ETHICS

We observe high standards of business and personal ethics in the conduct of its duties and responsibilities. Suppliers must practice fair dealing, honesty and integrity in every aspect in dealing with us, our customers and other stakeholders of the supply chain.

#### Anti-Corruption

We are an active member of the [Maritime Anti-Corruption Network \(MACN\)](#), a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large. Suppliers should:

- promote transparency and accountability in its business;
- comply with applicable anti-corruption laws;
- have process in place to prevent bribery and corruption, which should expressly prohibit the direct or indirect giving of any offer, promise, bribes, kickbacks, inappropriate gifts or other undue advantages or remuneration in order to achieve improper business or personal advantage;
- avoid any type of facilitating payments intended to expedite or secure performance of a routine government action whether or not such activity may not violate local law; and
- comply with all applicable anti-money laundering laws and take steps to prevent our financial transactions from being used by others to launder money.

#### Anti-Corruption

We are committed to fair and open competition. Suppliers should:

- not engage in any form of anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.

#### Data Protection and Information Security

We are required to protect personal data<sup>2</sup> and the same is expected of our Suppliers. Suppliers should:

- adopt industry best practices on sharing, protecting and securing information;
- observe all data privacy legal requirements on the collection, processing and transfer of personal data; and
- report any suspected or actual information security incidents that impact our information or systems to us as soon as practically possible.

----- *End of document* -----

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BW Group: <https://bw-group.com/privacy-notice/>  
BW LPG: <https://www.bwlp.com/privacy-statement/>  
BW EPIC Kosan: <https://bwek.com/privacy-policy>  
<sup>2</sup>HAFNIA: <https://hafniabw.com/privacy-policy/>