

Supplier Code of Conduct



WAGENBORG SUPPLIER CODE OF CONDUCT

Founded in 1898, Royal Wagenborg is an international maritime logistics conglomerate. The family owned and managed company offers a variety of maritime services. Our mission is to be a leading worldwide multipurpose shipping company by making our business more sustainable every day and to pass this on to future generations. This can only be achieved by having a network of responsible business partners.

We are committed to integrity, sustainability and high standards of business ethics as reflected in this Wagenborg Code of Conduct, and expect our suppliers to commit to the same or have in place and commit to the supplier's own equivalent code of conduct.

LAWS AND REGULATIONS

The supplier is obliged to comply with the applicable laws and regulations of those countries where it conducts business.

RESPECT FOR HUMAN AND LABOUR RIGHTS

The supplier is expected to respect internationally recognized human rights.

Prohibition of forced labour

Forced labour in any form is forbidden. This includes modern slavery, human trafficking and bonded labour. Withholding wages or identity documentation, restricting movement, recruitment fees and the use of threat or intimidation are forbidden.

Prohibition of child labour

Child labour in any form is forbidden. The supplier shall ensure that young employees' health, safety, development or school attendance is not jeopardized.

Fair employment practices

Wagenborg expects all wages, including overtime and benefits to be equal or exceed the level required by applicable laws and regulations, and shall always constitute a living wage. Suppliers shall comply with applicable laws, international conventions, and industry standards on working hours. The supplier shall ensure that all workers have a signed employment contract in a language that is understandable to them, including information about their rights, responsibilities and employment conditions.

Freedom of association and collective bargaining

The supplier will respect its employees' legal right to freedom of association and right to collective bargaining.

Equal opportunities and non-discrimination

The supplier is expected to provide equal opportunities for all its personnel and not to allow discrimination. No one shall be discriminated based on gender (including pregnancy), age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation, other personal characteristics or any other reason not based on the requirements of the work.

Anti-harassment

The supplier is expected to respect the personal dignity of every individual. The supplier shall ensure that no harassment or any other unacceptable behavior takes place in its organization.

Respect for privacy

The supplier is expected to respect everyone's right to privacy, and process personal data in compliance with good data processing practices and applicable legislation.

HEALTH & SAFETY

The supplier will provide a safe and healthy working environment to prevent accidents, injuries and illnesses, and when applicable, provide safe and healthy residential facilities, with applicable local law as a minimum. The supplier shall identify hazardous materials and ensure their safe handling, transportation, storage, recycling, and disposal. The supplier shall ensure that employees are aware of and trained in these issues.

RESPONSIBLE BUSINESS PRACTICES

Confidentiality

The supplier is expected to protect confidential business information and agrees to use such information only for the jointly agreed purpose and limit the disclosure to those who have a strict need to know such information to carry out cooperation with Wagenborg.

Anti-corruption

Corruption and bribery in any form is forbidden, including obtaining or attempting to obtain a personal benefit or business advantage through improper or illegal means. The supplier should never offer gifts, hospitality or other benefits to Wagenborg's personnel that are more than reasonable in value. No gifts or hospitality are allowed during a tendering or other decision-making process.

Avoiding conflicts of interest

Conflicts of interest in any form must be avoided. The supplier has an obligation to openly disclose any potential conflicts of interest to Wagenborg when becoming aware of them.

Fair competition

The supplier is expected to compete fairly, not to participate in cartels and shall always act in compliance with applicable competition law.

Trade compliance

The supplier is expected to comply with applicable trade embargoes, sanctions and customs import and export regulations and shall inform Wagenborg without delay of any changes affecting the supplier's ability to comply with applicable trade compliance requirements.



Anti-money laundering and tax evasion

Wagenborg does not allow money laundering in any form. All taxes and tax-like charges must be reported and paid duly in accordance with applicable laws. The supplier is expected to take all necessary precautions to prevent any participation in activities related to money laundering or tax evasion.

Product safety

All products and services must meet the legal requirements and quality and safety criteria specified in contracts. The supplier must use raw materials of known origin and ensure the traceability of raw materials and finished products, and is obliged to provide this information to Wagenborg on request. The supplier will do its utmost to ensure that delivered products are safe for people and the environment.

Business continuity management

The supplier shall be aware of risks related to business continuity in both production and the supply chain, including risks such as pandemics, natural disasters, cyberattacks and terrorism.

RESPECT FOR THE ENVIRONMENT

The supplier is expected to comply with environmental regulations and standards applicable to their operations. The environmental burden shall be minimized, and performance in respect of environmental matters shall be improved continuously. The supplier is recommended to set greenhouse gas emission reduction targets. An environmental management system is expected to be in use as applicable.

CONTINUOUS DEVELOPMENT

The supplier is expected to have appropriate controls in place to ensure that the requirements described in this Supplier Code of Conduct are fulfilled. Further, the supplier shall commit to continuously develop its operations with respect to these requirements.

The supplier is expected to ensure that all its suppliers recognize and respect the requirements of this Supplier Code of Conduct or the supplier's own equivalent code of conduct.

MONITORING

Wagenborg conducts systematic supplier assessments and audits to ensure the compliance of this Supplier Code of Conduct. Wagenborg is available for supplier personnel to report breaches of this Wagenborg Supplier Code of Conduct.

The rights and privacy of anyone raising a concern in good faith shall be protected, and no form of retaliation shall be tolerated.

This policy will be reviewed periodically and updated as necessary.

Delfzijl, 17 March 2026

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CEO

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