



MAERSK

ALL THE WAY

Violation Types

Breach by Supplier

Violations of the supplier code of conduct by any of the direct or indirect suppliers of Maersk.

Breach of IT

Unauthorized and unlawful disclosure of confidential or company owned information or systems, including unauthorized attempts to disable, crack, hack or otherwise circumvent security controls.

Breach of laws

Violation of any laws or regulation, breaches of rules, company values or code of conduct, which are NOT related to HR.

Competition Compliance

Any form of agreement (or understanding) with competitors to:

- Fix prices or other parameters of competition,
- Rig bids,
- Allocate customers, geographic areas, and/or restrict supply,
- Exchange of commercially sensitive information (e.g. prices, sales volumes, marketing plans, customer lists);
- Trying to abuse the Company's dominant market position (e.g. refusal to supply; discriminating between customers; tying services).

Corruption involving government officials

Improper influence, bribery, or unethical conduct in interactions with government officials, potentially in violation of anti-corruption laws and company policies.

Damage or harm relating to communities, livelihoods or properties

Actions harming persons or their livelihoods or properties, including e.g. child labour, human trafficking and forced labour linked to our operations.

Data Privacy

Unauthorized access to and unlawful handling or disclosure of personal data possessed by the Company regarding employees, customers and others.

Fraud

- Improper or misleading actions e.g. falsification of records, relating to reimbursements, benefit plans, sick or other paid time off programs.
- Misstatement of revenues, expenses, assets, wrongful transactions or misapplications of Generally Accepted Accounting Principles (GAAP) as well as transactions that are not properly authorized, recorded and reported as required.
- Stealing, misuse of equipment, misuse of company credit cards, travel or entertainment, theft of intellectual property rights, or kickbacks.
- Conflict of interest - when an employee's interests or activities affect the ability to make objective decisions for Maersk. It may involve commercial partners e.g. customers, vendors.

Health, Safety, Security and Environment

Environmental damage or negligence regarding environmental protection or the health and safety of employees as well as others linked to the Company's business or operations.

HR related breaches

HR-related violations of any laws, regulations, company rule or severe breaches of code of conduct or company values. However, the system does not cover general questions relating to employment. This also includes:



- Discrimination - Any distinction, exclusion or preference made on the basis of e.g. race, color, gender, religion, nationality, ethnicity, sexual orientation or disability, which has a negative effect on equal opportunity and treatment in employment or occupation.
- Retaliation - Verbal, physical or written discriminatory, threatening, intimidating or harassing behavior toward an individual who has made or intends to make a good faith report regarding a compliance issue.
- Sexual harassment - Actions that can reasonably be considered as sexually offensive, intimidating or discriminatory. This also includes sexual favors as a condition for employment, promotion or evaluation.

Insider trading

The purchase or sale of stock or other securities based on confidential and material information obtained through employment, or providing such information to another person who purchases or sells stock or other securities based upon that information.

International Trade

Violations in international trade include breach of local regulatory restrictions and mishandling hazardous cargo. These can involve restricted goods, improper documentation, or unsafe transport of dangerous materials—leading to legal, environmental, and safety risks.

Money laundering

Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support crime or terrorism.

Sanctions & Export control

Actions that violate relevant trade controls, including economic sanctions against parties, governments or countries and import and export laws and restrictions.