

Maersk Anti Discrimination, Harassment, Bullying and Violence Policy

This policy applies globally to all employees of Maersk and Maersk entities, controlled and non-controlled joint ventures and third parties under the control of Maersk or a Maersk entity, who work on our premises or on our behalf. This policy sets out the minimum standards of behaviour required of our employees globally to ensure an inclusive environment free from harassment, violence, discrimination, bullying and retaliation at Maersk. This policy outlines employees personal responsibilities and provides information on what employees should do should they need to raise a complaint related to a breach of this policy.



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A.P Møller Maersk Global Anti- Bullying, Harassment, Violence and Discrimination Policy

Introduction

Maersk will treat every employee with respect and dignity and is committed to creating an inclusive workplace where diversity is valued. We will not tolerate bullying, discrimination, violence or harassment of any kind on the basis of gender, race, colour, religion, disability, political opinion, sexual orientation, national origin, trade union membership or any additional status protected by international law and/ or internationally accepted standards

Discrimination, harassment, violence, bullying and retaliation have no place in Maersk's culture. Every employee has the right to work in an environment that is free from prejudice, bias, offensive and inappropriate behaviour. Discrimination, harassment, violence, bullying and retaliation can damage employee morale, confidence, competence and performance, not just for the individual who experiences it but for those that witness the impact of the behaviour. It can also negatively impact on Maersk's reputation and create a legal risk for employees and Maersk.

Maersk as a global company commits to respecting international human rights standards and adopting global policies that apply to all workplaces. Even when global policies may differ from local legal requirements, we still expect our employees to adhere to our global policies and standards. Please seek guidance from your local HR when in doubt.

This policy should be used in partnership with:

- Any relevant local policy that covers harassment, violence, discrimination, bullying and retaliation
- Maersk Commit Rule on Employee Relations
- Maersk Code of Conduct
- Maersk Values

Roles and Responsibilities

All employees have a personal responsibility to make themselves aware of and uphold the standards in this policy. All employees are expected to speak out against harassment, violence, discrimination and bullying. Where it is safe to do so, employees are expected to support the victim and to address harassment, violence, discrimination and bullying as soon as possible.

People leaders are responsible for preventing and reporting harassment, violence, bullying and discrimination and taking action, when it is safe for them to do so, to stop it where it has occurred.

We expect our people leaders to lead by example and role model inclusive behaviour. People leaders must recognise that their behaviour, what they say, what they choose to challenge and what they choose to accept, will often set the tone for the employees they lead.

Purpose / Objective

The intended outcome of this policy is to:

1. Set out the minimum standards of behaviour required of our employees globally to ensure an inclusive environment free from harassment, violence, discrimination, bullying and retaliation at Maersk.
2. Ensure that our employees understand their personal responsibilities for upholding the standards set for our work environment
3. Provide our employees with information on what to do should they need to raise a complaint related to a breach of this policy.

Scope

Unlawful discrimination and harassment, including sexual harassment, discriminatory harassment, and other conduct such as bullying and retaliation prohibited by law or Maersk policies will not be tolerated by Maersk. This policy is intended to prohibit all improper and/or unlawful discrimination and harassment in the work environment, at all Maersk locations, and by a Maersk colleague regardless of location including, but not limited to, client worksites, vessels, terminals, warehouses, business trips, company sponsored or client sponsored business and social functions, or in the use of Maersk resources, including electronic mail, voicemail, the Internet and social media. Maersk employees are required to completely refrain from unlawful discrimination and harassment, including sexual harassment, discriminatory harassment, and other conduct prohibited by law or Company policy even when outside of the work environment.

This policy applies globally to all employees of Maersk and Maersk entities, controlled and non-controlled joint ventures and third parties under the control of Maersk or a Maersk entity, who work on our premises or on our behalf. This policy underpins and should be used in conjunction with Maersk's Values, Commit framework and Maersk's Business Code of Conduct.

The policy provides:

- Maersk's expectations of employees and third parties,
- Definitions of discrimination, harassment, violence, bullying and retaliation
- The courses of action that can be taken to deal with and mitigate any breach of this policy

This policy is global and outlines the minimum standards expected of our employees. Please note that local policies should be used in conjunction with this policy. Local policies may provide specific definitions and courses of action to take based on local legislation. Where local legislation sets out higher standards than this policy, the local legislation should be followed in addition to this policy. In Maersk locations where local legislation does not cover discrimination, harassment, retaliation and bullying, this policy should be followed.

Definitions

Harassment

At Maersk, Harassment includes, but is not limited to, any improper, inappropriate and / or unwelcome behaviour that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment.

Sexual harassment

At Maersk, sexual harassment, includes, but is not limited to, unwelcome or uninvited behaviour of a sexual nature which is offensive, embarrassing, intimidating or humiliating. Sexual harassment can be suffered by anyone.

Specific examples of **sexual harassment** include but are not limited to:

- Use of coercive sexual behaviour
- Offensive behaviour by one person that may humiliate another person due to their sex
- Requests or demands of a sexual nature
- Verbal and non-verbal harassment such as offensive jokes, publications, comments etc.
- Continued suggestions for dating, romance etc. after it has been made clear that these suggestions are unwelcome. Unwelcome physical contact of sexual nature ranging from unnecessary touching to sexual assault.

Race, Ethnicity, or National-Origin based harassment

At Maersk, race, ethnicity, or national-origin, based harassment and discrimination includes, but is not limited to, behaviour that intimidates, humiliates, ridicules or undermines the confidence of a person by reason of a person's race, ethnicity, colour, nationality, ethnic or national origin.

Specific examples of **racial harassment** include offensive behaviour by one person that may humiliate another person due to their race. Behaviour such as, but not limited to:

- Verbal comments, jokes and innuendo that are perceived to be offensive
- Rude or offensive gestures, interrogation or teasing someone about their race or customs
- Display of racially abusive slogans, pictures, objects or publications
- Visible exclusion of a minority race in a group gathering

Violence

The term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.

The term "gender-based violence and harassment" means violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment.

Bullying

At Maersk, bullying includes but is not limited to, behaviour that mistreats others and causes either physical or emotional harm. Bullying can be verbal, non-verbal, psychological and physical humiliation.

Examples of bullying and harassment can range from extremes such as violence to less obvious forms, such as ignoring someone. Harassment or bullying can be direct (i.e. face to face) or indirect (i.e. voicemail, text, messaging, email)

Examples may include (but are not limited to):

- Offensive posters, symbols or gestures
- Exclusion such as non-cooperation or ignoring someone
- Inappropriate jokes, language or slander
- Stalking someone
- Unwelcome physical contact pushing, shoving, kicking, poking, tripping, damaging to a person's work area or property
- Unsubstantiated, persistent criticism
- Unwelcome or inappropriate remarks about someone's religion, race, marital / civil status or appearance
- Shouting at or being sarcastic towards individuals
- Physical or psychological assault or threats
- Abuse of power by those in positions of authority
- Publicly humiliating someone

Discrimination

Maersk, **discrimination** includes, but is not limited to, the practice of treating one person or group of people less fairly or less well than other people, on the basis of: ethnicity, colour, sex, disability, age, religion, political opinion, nationality, sexual orientation or social origin (among other characteristics).

Retaliation

For the purposes of this policy, Maersk considers retaliation to include, but is not limited to, treating a person less favourably than others because that person has complained in good faith that someone has violated Maersk's Values, Commit framework and Maersk's Business Code of Conduct. For the purposes of this policy this would specifically be a complaint made in good faith that someone has been violent, bullying, discriminating against them or harassing them. It can also apply to treating a person less favourably than others because that person has supported someone to make the complaint or given evidence in relation to the complaint. Examples of this could include but are not limited to, isolating or ignoring someone because they have made a complaint in good faith or supported someone to make a complaint.

Breaches

We realise that it may be difficult to raise what can be very sensitive and hurtful issues, however we encourage anyone who has experienced or witnessed behaviour that breaches the standards outlined in this policy to report it to the company as described below under "Reporting breaches".

We all have a responsibility to help uphold the standards set out in the policy.

Maersk will ensure that:

- Breaches of this policy will be taken seriously
- Complaints are handled promptly and with care
- Any discussion will remain as confidential as possible while we investigate and information will only be disclosed to authorised personnel or authorities as necessary, to ensure that a fair investigation is conducted. Unless there is a legal requirement not to do so, the reporter/reporting party will be notified if and when the information given is disclosed to authorised personnel or authorities.
- All parties involved are treated objectively and fairly
- Management will display the necessary discretion and protection of the dignity, safety and privacy of all parties involved.
- Appropriate action will be taken, where relevant, to ensure that the behaviour reported is ended.
- Appropriate disciplinary action will be taken, where relevant, against the perpetrator
- Appropriate redress for the victim is implemented

The intent of a person who has discriminated, harassed, victimised, bullied or been violent towards another individual, is not a (decisive) factor when assessing a breach. This policy aims to ensure that reports and investigations are handled in ways that are inclusive, fair, gender sensitive and support the human rights of the victim. If you have any doubts as to whether a breach has occurred, or need any guidance to make a decision, you are encouraged to seek advice. You can do this through your local HR, your line manager or the ombuds office.

Reporting breaches

Any employee who has experienced or witnessed behaviour that breaches this policy should report the incident to either of the following:

- Local manager - who should then coordinate with Local HR unless Local HR is the subject of the complaint
- Local HR
- Employee representatives/health and safety representatives

If you feel you do not want to use the above channels, you can report directly or anonymously using the Whistle-blower system.

Whistle-blower – The Maersk Whistle-blower hotline/ system is a confidential channel through which you can raise concerns about suspected serious violations of laws or Maersk

Rules in areas such as: insider trading, competition law, IT security, data privacy (GDPR), threats to health, safety and environment, theft and embezzlement, accounting manipulation, financial fraud, corruption, foreign trade controls, human rights and labour rights, work place and/or sexual harassment, retaliation or discrimination.

What will happen when you report through HR and line management?

HR or line management will listen, act swiftly and treat all complaints as confidentially as possible, to ensure a fair, complete and accurate investigation. It is likely that they will ask for further details such as when the incident/s happened, the name of the alleged perpetrator, what happened, whether there were witnesses, what action you took and for any other information that will help them further understand the issue.

Where further investigation is needed, this will be managed taking into consideration the sensitivities related to the victim and the case.

If based on a thorough investigation another employee, manager or third party is found to be engaging in any of the behaviours that constitute harassment, violence, bullying, discrimination and retaliation this constitutes a breach of this policy and may result in disciplinary action including but not limited to:

- Mediation
- Training / Counselling or coaching
- Written warnings
- Changes to position (demotion, internal transfer etc.)
- Termination of employment

The redress and remedy will be proportionate to the harm experienced.

Local legislation and any relevant collective agreements will be respected at all times.

In some instances, Maersk has a legal obligation to report breaches to the appropriate enforcement authorities. If legislation has been violated, Maersk will report and co-operate fully with appropriate authorities according to local legislation.

Any individual who has condoned, participated, authorised or concealed any actions that breach this policy will also be subject to disciplinary action.

In addition, the victim may be offered internal transfer or psychological counselling, depending on the situation and taking into account -to the extent that this is reasonably possible- the wishes of the victim.

Further information

- Diversity and Inclusion Intranet site
- Link to Anti-Discrimination, Harassment and Bullying site
- Ombuds Office - The Maersk Ombuds Function is an independent, neutral, confidential and informal service to all employees. They offer a voluntary safe place for employees to seek guidance, voice concerns or discuss options for any work-related matter