

CHANGING THE GAME AT SEA



Code of Conduct

Introduction

At SH Group A/S, we are committed to conducting our business with integrity, fairness, and respect. This Code of Conduct outlines the principles and standards that guide our actions and decisions. It applies to all employees and agents, subcontractors and suppliers (business partners) associated with SH Group A/S. Business partners must work to ensure that their employees and subcontractors comply with the requirements of this Code of Conduct.

Laws and Regulations

All employees and business partners must comply with all applicable laws, regulations, and company policies. This includes, but is not limited to, labor laws, sanctions, environmental regulations, and anti-corruption laws.

SH Group A/S expects business partners to demonstrate responsibility in their supply chain by identifying, preventing, and managing risks related to human rights, working environment and labor rights, environment and climate, as well as business ethics and anti-corruption.

We also expect our business partners to continuously work on identifying risks and ensuring that they take appropriate measures to manage any risks.

Business Conduct Requirements

Human Rights, Working Environment, and Labor Rights

In line with SH Group A/S's commitment to responsible business, we are committed to respecting internationally recognized human rights standards and complying with national legislation, and we expect the same from all associated parties.

Our Code of Conduct reflects our commitment to the UN Global Compact and our respect for universally recognized Normative standards such as the United Nations Universal Declaration of Human Rights and the core labour Conventions of the International Labor Organization.

This means, among other things, ensuring not contribute to violations of human rights and under no circumstances may use or otherwise benefit from human trafficking or modern slavery, including forced labor, debt bondage, and child labor.

It is required to actively strive to ensure a safe and healthy working environment for employees, minimize workplace accidents, and provide the necessary safety and protective equipment so that employees and subcontractors can perform their jobs safely.

Furthermore, complying with all applicable employment regulations and eliminate discrimination in employment and working conditions and not impose unfair restrictions on employees' freedom of movement is also required, including allowing employees to freely organize and be members of trade unions.

Equal Opportunity Rights

We expect business partners not to engage in or support discrimination, and to adopt a non-discriminating practice, that strives to ensure equal treatment in recruitment, hiring, compensation, access to training, employee benefits and services, promotion, termination and retirement, irrespective of age, gender, race, color, disability, religion or belief, language, national or social origin, trade union membership, or any other status recognized by international law.

Environment and Climate

At SH Group A/S, we strive to minimize our direct and indirect impact on the environment and climate, including reducing our greenhouse gas emissions, minimizing waste, and promoting environmentally friendly practices. We encourage our business partners to do the same.

Business Ethics and Anti-Corruption

SH Group A/S is a trustworthy and transparent organization that acts with high integrity. We have high standards for business ethics and reject all forms of corruption, bribery, and abuse of power.

SH Group A/S expects our business partners to share our commitment to business ethics and actively work to prevent corruption in all its forms. This means that a business partner has effective procedures in place to prevent all forms of corruption in their activities. This includes, but is not limited to, bribery, extortion, and unauthorized payments.

Any form of corruption, extortion, bribery, or unauthorized payments, whether offered, received, or promised, is strictly prohibited. We expect our business partners to act in accordance with these principles and promote a culture of transparency, accountability, and legality.

Non-Compliance for business partners

All business partners are responsible for ensuring that their employees and subcontractors are aware of this Code of Conduct and all applicable international standards and national legislation. If a business partner does not expect to be able to comply with this Code of Conduct, SH Group A/S must be informed in advance so that it is possible to enter into a dialogue about how and when the business partner will be able to comply with the principles.

If a business partner violates the requirements of this Code of Conduct and exhibits repeated negligence, or if a business partner refuses to improve in relation to problem areas, SH Group A/S reserves the right to terminate the cooperation.

This Code of Conduct is not intended as a complete list of all requirements and standards but as a guide to ensure responsible business conduct.

Whistleblower Scheme

SH Group A/S has a whistleblower scheme where serious matters or suspicions of, for example, bribery, extortion, embezzlement, theft, accounting manipulation, sexual harassment, and other issues can be reported anonymously and securely.

Any matters of concern can be reported via: whistleblower@shgroup.dk

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