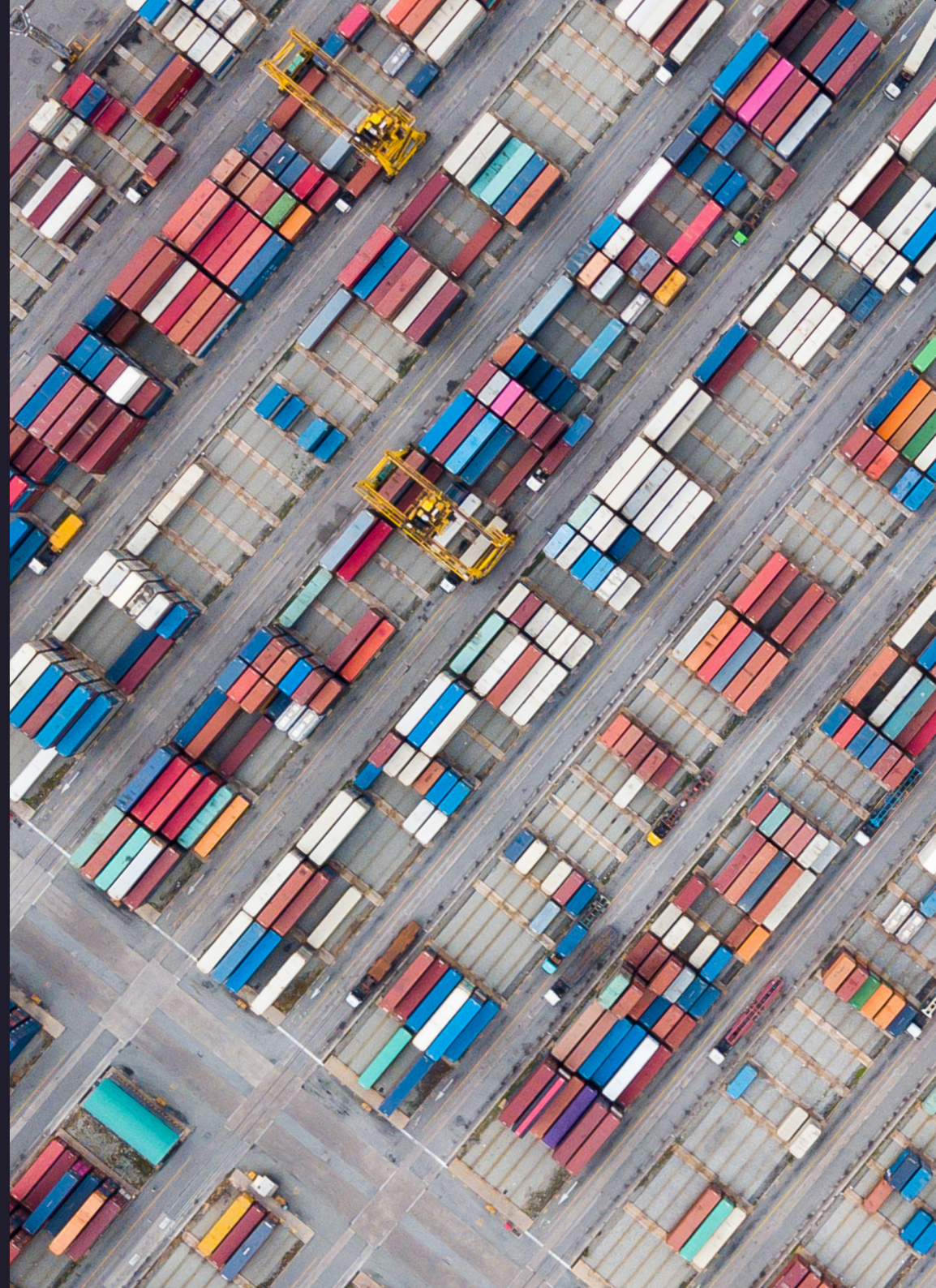




# DCSA Code of conduct





# A message from the CEO

Digital Container Shipping Association (DCSA) is an independent association established in 2019 by a number of the world's largest container shipping companies. We are a rapidly growing organisation active in the dynamic market of container shipping. Our goal is a formidable one, to make containerised shipping services more accessible, flexible, efficient and environmentally friendly. In such an established yet rapidly changing environment, it is our aim within DCSA to foster collaboration, build the standards necessary for digital transformation and enable industry stakeholders to bring innovative solutions to market.

In order for us to reach our ambitious goals, we see it as imperative to build a team that is as diverse in background as it is with its professional experience. This is an opportunity to bring breadth of knowledge and cultural wealth to our organisational growth. Given our objective of diversity, it is important we have a shared understanding

of the principles and rules that govern our professional conduct. This Code of Conduct is meant as a guide to clarify and unify expectations of our individual and collective ethical behaviour. It also serves as a reference to help us understand our policies and what to do if you find yourself in a situation where you need help.

Our Code is meant for everyone who has a work-related relationship within DCSA. Therefore, the Code applies to all employees, contractors, management and the Board of Directors, located anywhere and working for DCSA on a full or part-time basis. For ease, we refer to all persons covered by this Code as "employees", even though the Code includes contractors and other parties of employ. We expect everyone to read, understand and adhere to DCSA's Code of Conduct and its referenced policies and procedures.

In the event the Code sets forth a higher standard than required by commercial practice or applicable laws, rules or regulations, we adhere to these higher standards. The Code is not intended, and cannot be, a comprehensive rulebook to address every situation that you may encounter. If you are faced with an unforeseen event that may not be covered explicitly by the Code, ask yourself the following questions:

---

Is this conduct legal, honest and fair?

---

Will this conduct negatively affect DCSA or its members?

---

Is this conduct contrary to the (purposes of the) Code?

---

Would I be proud of this conduct if others were to find out?

---

If you feel you have experienced or are experiencing behaviour that is out of line with the Code on a personal or professional level,



we ask you not to keep quiet, but rather to reach out and raise your concern to any member of management as early as reasonably possible.

If you believe the situation could be treated with bias, you are able to submit your concern through our whistleblower system on our website.

DCSA has a zero-tolerance policy towards violations of this Code and will take any report seriously.

We will revise the Code to ensure it consistently reflects our values and ideal behaviours as individuals and professionals throughout the operations of DCSA.



# Table of contents



<b>1 Working at DCSA</b>	<b>4</b>
a. Safe working environment	4
b. Duties of employees	4
c. Breach of the code	4
d. Reporting violations of the code	4
<b>2 Act professionally and with integrity</b>	<b>5</b>
a. General responsibilities	5
b. Legal substances	5
c. Fraternisation	5
d. Violence	5
e. Harassment and discrimination	6
f. Online behaviour	6
<b>3 Attitude towards our members</b>	<b>7</b>
a. Show respect to our members	7
b. Only accept a high-quality service	7
<b>4 Acting ethically and with trust</b>	<b>8</b>
a. Conflict, or potential conflict of interest	8
b. Antitrust competition law	8
c. Relationships with competitors, other regulators and associates	8
d. Bribery and corruption	9
e. Gifts and benefits	9
<b>5 Digital and non-digital information</b>	<b>10</b>
a. Confidential DCSA information	10
b. Data privacy	10
<b>6 Assets &amp; property</b>	<b>11</b>
a. Fixed assets and inventory	11
b. Allocated equipment	11
c. Intellectual property / confidential information	11
d. Misuse of funds	11
<b>7 Environmental and sustainability policy</b>	<b>12</b>
a. Sustainability	12
b. Environment	12
<b>8 Final reminder</b>	<b>13</b>

# Working at DCSA



## Safe working environment

At DCSA we prioritise your safety and are committed to providing a safe workplace and culture for our colleagues. To achieve this, we all must play a part. You should always conduct yourself with your own safety and that of others in mind, whether that be safety from physical hazards, or the protection of mental health and well-being.

This includes ensuring our employees work safely and are not placed in a position that could cause them avoidable harm. At DCSA we are committed to minimising or eliminating risks of injury or illness to you and maintaining a culture that encourages all employees to actively manage occupational health and safety risks. We comply with all relevant occupational health and safety legislation and requirements.

## Duties of employees

As a DCSA colleague, you are responsible for familiarising yourself and complying with this Code and any policies and procedures that are applicable within DCSA or provided by DCSA. We encourage you to take responsible action by making enquiries if you are unsure about what actions you should take.

Furthermore, DCSA fully supports and always works to comply with human rights and labour laws. You must recognise and support equal human rights, on the understanding that you must not tolerate:

- differential treatment;
- discrimination;
- harassment;
- inappropriate or unreasonable interference with work performance;

We at DCSA care about our people. We will guarantee a safe work environment, which means that we respect international human rights and treat each other with respect. DCSA stands for a diverse, healthy, safe and secure workplace for everyone who is involved in our organisation

whether based on nationality, race, disability or gender, including gender identity or gender expression, sexual, religious or political orientation, ethnic or social background.

## Breach of the code

A breach of this Code will be viewed as a serious matter. If you are found to be in breach of this Code, you may be subject to disciplinary action, termination of employment or other legal action.

## Reporting violations of the Code

All employees have a duty to report any known or suspected violation of this Code and any

violation of the laws, rules, regulations or policies that apply to DCSA. Reporting a known or suspected violation of this Code should not be considered an act of disloyalty, but an action to safeguard the reputation and integrity of DCSA and its employees. In the event that you know of or suspect a violation of this Code, you must immediately report the conduct to your leader, a member of the Leadership Team or use the whistleblower link on the DCSA website.



# Act professionally and with integrity



## General responsibilities

Each employee or contractor of DCSA is expected to present themselves in a professional manner, including arriving on time and wearing presentable clothing, fitting for the situation at hand. Employees shall use common sense and act respectfully towards one another and other persons involved with or in contact with DCSA. Employees shall respect each other's choices and be mindful of the different opinions or views upheld by their colleagues or other persons involved with or in contact with DCSA.

Acting in a professional manner also means complying with applicable law and not using any illegal substances.

## Legal substances

Alcohol may under certain circumstances be offered to you, for example during a business dinner or meeting with a member, client, customer or similar. If the workday has not ended and there are more meetings ahead, we generally refrain from drinking. In all instances you are reminded that any social events you attend due to your position with DCSA will require professional conduct and you should therefore drink responsibly.

Smoking is forbidden in all DCSA offices and meetings, including at any meeting which takes place outside our offices in a facility where smoking is otherwise permitted. You will generally find designated smoking areas outside and these should be used if you wish to smoke.

## Fraternisation

At DCSA, romantic or sexual relationships between employees are discouraged.

Those in a managerial or supervisory position are forbidden from entering into romantic or sexual relationships with employees.

## Violence

The safety and security of DCSA's employees is vitally important. DCSA will not tolerate violence or threats of violence in, or related to, the workplace. Employees who experience, witness or otherwise become aware of a violent or potentially violent situation that occurs within or related to DCSA's workplace, or affects DCSA's business, must immediately report this.

# Act professionally and with integrity (continued)



## Harassment and discrimination

DCSA is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of nationality, race, disability or gender, including gender identity or gender expression, sexual, religious or political orientation, ethnic or social background.

DCSA prohibits harassment in any form, whether physical or verbal and whether committed by leaders, non-managerial personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive objects or pictures.

## Online behaviour

DCSA encourages the use of social media and other online platforms for business communication and networking purposes. When interacting on social media platforms, including but not limited to LinkedIn, Facebook and Twitter, consider all your posts as public and avoid disclosing confidential information. When using social media, employees shall respect other's views and be mindful of the different opinions or views held by other persons.



# Attitude towards our members



## Show respect to our members

Always treat our members and their representatives with a high degree of respect. You are under no circumstances allowed to insult, mistreat or otherwise unfairly treat a member or their representatives.

## Only accept a high-quality service

We only achieve member satisfaction by providing our members with the best service. Make sure that you offer the optimal service, so that the members remain motivated to work with us.

This, in turn, requires that you set high standards from vendors and partners and conduct proper due diligence in the contracting of vendors, suppliers or contractors.



“DCSA’s prosperity is dependent on the satisfaction of its members. As an employee or contractor of DCSA, you have an important role in this, which we are happy to entrust to you.

Maintaining a good business relationship with our members or suppliers is only possible if everyone at DCSA treats such parties with integrity, fairness and mutual respect.”



# Acting ethically and with trust

## Conflict, or potential conflict of interest

DCSA recognises that we all have our own individual interests and encourages the development of these interests, especially where they are beneficial to the community at large. However, we must always act in the best interests of DCSA, and we must avoid any situation where our personal interests conflict or could conflict with our obligations toward DCSA. The employees must not acquire any financial or other interest in any business or participate in any activity that could deprive DCSA of the time or the attention we need to devote to the performance of our duties. The employees must not, directly or indirectly through any members of our families or persons living with us or with whom we are associated, or in any other manner: have any

financial interests that could have a negative impact on the performance of our duties or derive any financial benefit from any contract of DCSA.

You have an obligation to inform your leader of any business or financial interests that could be conflicting or possibly conflicting with the performance of our duties. If the leader considers that such a conflict of interest exists or could exist, he or she will take the steps that are necessary in the circumstances.

## Antitrust competition law

DCSA is committed to a “zero tolerance” policy relating to antitrust breaches. Strong safeguards have been put in place to ensure competition compliance, including an antitrust framework which is part of DCSA’s statutes,

antitrust trainings for all DCSA employees and external antitrust counsel participating regularly in DCSA meetings attended by DCSA members. All employees are expected to comply with our antitrust framework and competition rules.

In particular, competitively sensitive information (freight rates, volumes etc.) must not be exchanged between DCSA members via DCSA. As a DCSA employee, you must distance yourself clearly and immediately from any illegal anti-competitive behaviour, report any potential violations and seek legal advice from DCSA’s antitrust counsel if in doubt.

## Relationships with competitors, other regulators and associates

DCSA is committed to free and open competition throughout all business dealings. Employees should avoid all actions that reasonably could be construed as being anti-competitive, monopolistic or otherwise contrary to laws governing competitive practices in the marketplace. Examples of such actions include misappropriation and/or misuse of a competitor’s confidential information or making false statements about the competitor’s business and business practices. This is especially relevant for DCSA, since the members of DCSA are or can be competitors of one another. Prices or competitive information of one member may not be shared with the other members.





# Acting ethically and with trust (continued)



## Bribery and corruption

DCSA recognises that its reputation for conducting business in an ethical and honest way is a core company value that must be protected. Therefore, DCSA does not tolerate any form of bribery or corruption. Bribery refers to any offer or acceptance of a gift, loan, fee, remuneration or anything of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate in the absence of the bribery.

Corruption refers to abusing entrusted power, for example for personal gain.

DCSA has a “zero-tolerance” approach to acts of bribery or corruption by any of our employees. As well as being

morally wrong, bribery and corruption are criminal offences that expose DCSA and individuals to the risk of prosecution, fines and imprisonment.

## Gifts and benefits

Smaller gifts up to a value of 100€ may be accepted from external parties for example in relation to the holiday season.

However, gifts may not be accepted in situations where it could be considered as a bribe or in any way influencing a future business decision.

To avoid uncertainty, gifts may not be accepted from an external party with whom DCSA is having an ongoing negotiation or from consultancy agencies.

Taxation on gifts is a personal matter that you must personally report to the tax authorities and pay any necessary taxes for.

If you have any questions about whether it is permissible to accept a gift or something else of value, contact your leader.



# Digital and non-digital information

## Confidential DCSA information

Confidential DCSA information may include personal, member, technical, strategic, financial or commercial information. This information must be kept confidential, and it must be used solely for DCSA purposes or other purposes that have been made known to you explicitly. All information contained within DCSA's environment will be treated as an asset of DCSA, although information provided by members may belong to a member. Therefore, these sorts of information may only be disclosed to any party or another member in cases where this is explicitly permitted.

Each employee should be mindful and discrete with any information that is shared with a member. Please be aware that there are different kinds

of information that DCSA receives from its members: non-confidential information, confidential information (if labelled by a member as such) and confidential information not to be shared with other members or third party (if labelled by a member as such). Always make certain that your use of information is in line with the obligations that DCSA has taken upon itself towards its members and third parties and when in doubt, research, request and report the information to be used and the intended purposes to your leader.

DCSA has an obligation to hold confidential information of members or of third parties in confidence, and not to make such information publicly available or share such information with unauthorised persons.

Employees must not disclose confidential information to anyone other than those who need to know such information in order to perform their work on behalf of DCSA and provided that such person or entity is subject to confidentiality obligations. Confidential information obtained during your activities for DCSA remains confidential, even after your employment or involvement in DCSA ends.

The employee is responsible for any loss of confidential information, which includes leaving information unattended in public places or inadvertently sending official information to an incorrect recipient. Confidential information must not be read openly or discussed in public areas.

## Data privacy

DCSA is subject to data privacy legislation and DCSA expects its employees to comply with such legislation and regulations. DCSA may issue binding corporate rules to ensure compliance with such legislation and regulations. Each employee is charged with ensuring compliance with such legislation so as to protect collected personal data from being copied, corrupted, misused, stolen, disclosed or made accessible to persons without adequate authorisation and approval. DCSA wishes to stress that each employee has a responsibility to report any infringements or identify any areas for potential improvement in this regard to their leader.





# Assets & property

## Fixed assets and inventory

The employees of DCSA must take reasonable care of all DCSA equipment so that they remain in a safe and usable condition. Employees must take care to avoid damage to DCSA property. In either case, DCSA will take the appropriate measures to recover the cost of any damage.

## Allocated equipment

DCSA may provide its employees with equipment, such as (mobile) equipment, laptop and/or accessories, if this is necessary in order to perform their job. These resources are provided on loan and remain the property of DCSA. DCSA reserves the right to reclaim the equipment at any time if it is not being used fairly or for proper purposes in DCSA's opinion.

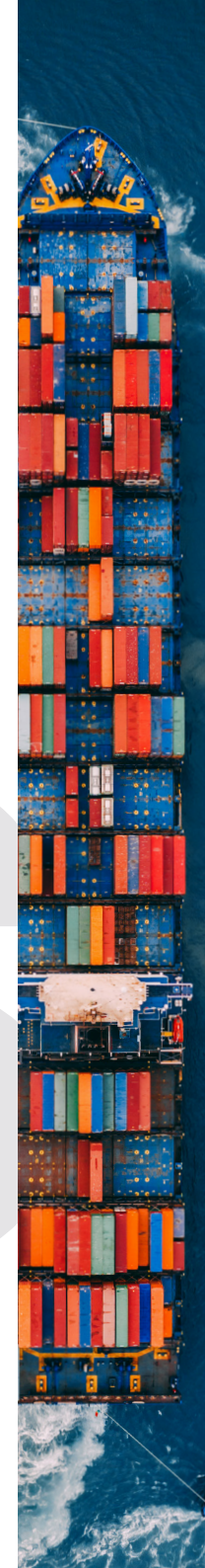
In the event of loss or theft of the equipment, employees have the duty to report this to their leader without any delay. All employees must return their assigned equipment to their leader, in case they leave DCSA.

## Intellectual property / confidential information

Intangible property, such as inventions, ideas, documents (whether physical or electronic), know-how, confidential information, software, patents and other forms of intellectual property related to the business of DCSA, created or conceived by employees in connection with the performance of their duties, will be considered as asset of DCSA. Such rights and information may only be used for DCSA purposes and not for any other purposes.

## Misuse of funds

DCSA funds shall always be used in the best interest of DCSA and only for business purposes. DCSA employees shall always act diligently and in a professional manner with DCSA funds. DCSA employees can only claim actual costs incurred, evidenced by invoices.



# Environmental and sustainability policy

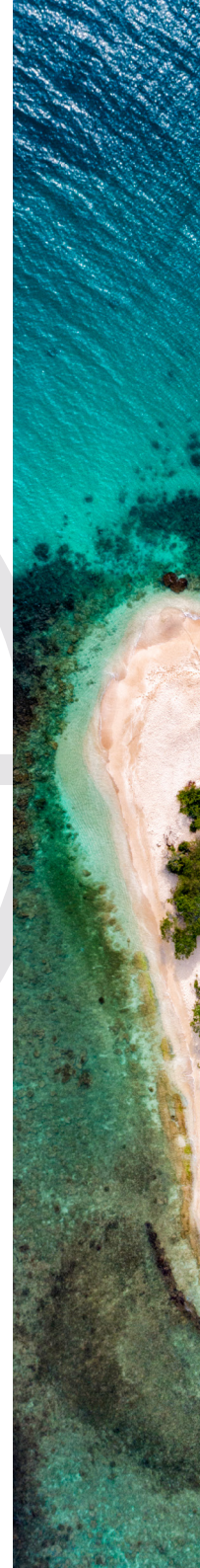


## Sustainability

We encourage our employees to always be mindful of the environmental impact of their daily activities and actions. Recycling when possible, using electronic documentation in place of printed documents whenever possible, and being careful not to waste resources are simple ways to participate in protecting our environment. Any suggestions or questions you may have regarding our environmental policies should be raised with your leader.

## Environment

DCSA seeks to eliminate any activity that risks harming the environment in any way and strives to conserve energy, thus preserving resources and increasing efficiency. This includes complying with all environmental legislation and regulations required by the territories where we conduct business, in the interest of protecting all aspects of the marine and global environment.





# Final reminder



This Code contains general guidelines for conducting the business of DCSA consistent with the highest standards of business ethics.

If you have any questions about these guidelines, please contact your leader or anyone from the Leadership Team.

We expect all employees, regardless of their level or location, to adhere to these standards. Each employee is separately responsible for his or her actions. Conduct that violates the law or this Code cannot be justified by claiming that it was ordered by a leader or someone in higher management. If you engage in conduct prohibited by the law or this Code, you will be deemed to have acted outside the scope of your employment. Such

conduct may subject you to disciplinary action, including termination of employment.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing DCSA policy. DCSA reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

You are required to remain updated with the latest version whenever a new version is released.

