

CODE OF CONDUCT

INTRODUCTION

All TEKNA SHIPPING activities are complying with current legislations, International Treaties and in strictly accordance of United Nations Universal Declaration of Human Rights.

TEKNA SHIPPING operates with in a fair competition manner with integrity, trustworthiness, honesty and a good faith towards the interests of its employees, clients, commercial partners, investors and its community.

TEKNA SHIPPING supports especially social responsibility, incorporating civil and environmental concerns in its strategic vision.

All TEKNA SHIPPING employees are committed to comply and make others comply the above principles within their duties and responsibilities, where no decision in favor of the company can be made without following these principles.

Therefore, Code of Conduct has been drawn up, where all TEKNA SHIPPING employees must adhere for its good running, reliability and reputation, making a solid heritage for the success of the enterprise.

TEKNA SHIPPING employees ad partners must fulfill general and operational duties, as per terms ad conditions, with fairness, loyalty, honesty and they must not encourage any form of competition against TEKNA SHIPPING, supporting company policies and adhere to this Code of Conduct. Relations between all employees at any level must be made with transparency, loyalty, correctness and mutual respect.

All employees must know and adhere to both Code of Conduct and DOC. Any sort of behavior not complying with this code will be addressed according the CCNL regulations and company rules.

TEKNA SHIPPING supervises constantly the compliance of its Code of Conduct providing guidance, support and audits.

1 - Compliance with Laws, Rules and Code of Conduct

All TEKNA SHIPPING employees are expected to align their own actions and behaviors with principles, objectives and commitments of this code, as well as adhering to current legislations and regulations. Particularly, all employees must take into account this Code of Conduct to draw projects, to set company targets, to manage shares and investments for a long term increase of capital, management and technological assets, and wellbeing for employees and community.

All TEKNA SHIPPING actions, operations and negotiations and employees working behaviors must adhere to a fair and transparent information handling. Act in accordance to this code is a major part of employees contracted duties, based on the applicable laws.

TEKNA SHIPPING requires to all external partners (consultants, agents, reps, etc.) to adhere to the principles of this code.

2 –Business Relations

All TEKNA SHIPPING activities and operations must be rightful, able to be verified, adhering with regulations and based on rightful information.

All business relations must adhere to the legal and ethical regulations, observing loyal, correct, transparent, efficient and open-minded fundamentals. TEKNA SHIPPING engages with international treaties, therefore all employees and individuals involved with its operations, must adopt a legit behavior to manage company activities and any relation with the local authorities. Any act of collusion, bribery or personal favor, direct or through third parties, is forbidden and potential disciplinary action or compensation can be applied.

3- Customers and Suppliers Relations

TEKNA SHIPPING holds a clear and fair relationship with its clients and suppliers, offering of competitive services with a respecting a fair play. Supplier choice and purchase terms are based on quality assessment, price and ability to provide and guarantee an adequate service.

All employees involved with contractors and supplying relations must:

- Follow internal guidelines for the selection and management of supplier accounts;
- Not preclude any potential suppliers the chance to apply and compete for a service with TEKNA SHIPPING adopting a transparent valuation and following the right procedure;
- Ensure suppliers support the company to meet clients expectations, also with a competitive price and delivery time;
- To use, in the best way, products and services from suppliers with a competitive working conditions, ensuring legal regulations are always met;
- Observing terms and conditions agreed;
- Establish a honest and clear conversation with suppliers, in line with savvy commercial practices;
- Inform the management team for any supplier issue, in order to have complete evaluation;

4 - Company properties

All employees and partners must take care and protect all company belonging and resources available to carry out their duties.

No employee is allowed to use belonging or any available resource inappropriately or allow someone else to do so. IT systems must be used only for company related purposes, in order to avoid damages or corruption of data and software belonging to TEKNA SHIPPING or third parties. The use company of IT systems for recreational purpose leads to a gross misconduct with a potential dismissal.

In case of resignation or retirement, any company property must be returned, including any documents and any other IT equipment containing company information. It is forbidden to disclose or use confidential information handled within the service with TEKNA SHIPPING. Any intellectual property developed by an employee, will remain company property in case the employee leaves.

5 - Human resources, personal safety and environment

TEKNA SHIPPING is committed to guarantee to its employees professionalism, safety and wellbeing, as well as to its external partners and clients. The company policy engages to establish and support employee skills, individual recognition, equal opportunity observation and United Nations Universal Declaration of Human Rights support.

TEKNA SHIPPING activities must be managed adhering to current environmental legislations and Health & Safety regulations for protection against accident at work. Research and innovation are particularly applied to develop products and processes, which are adhering to environmental regulations, with a great attention to safety and wellbeing of employees.

In addition to their duties and responsibilities, employees are involved with training for risk assessment, environment protection and health and safety for colleagues and themselves.

6 - Fidelity and Conflict of interest

TEKNA SHIPPING maintain a trustworthy and loyal relation with its employees. Employees have to pursue company targets and objectives with fidelity and honesty, they must prevent any sort of condition or activity leading to conflict of interest or inability to make neutral decisions.

Therefore, partners and employees must avoid situations or activities showing a collision with company interests, or interfering with their capacity to agree to an impartial resolution, prioritizing company interests and adhering to the this Code of Conduct.

Any sort of occasion determining or leading to a conflict of interest must be promptly communicated to the management, in order to assess the occurrence and severity of it.

As an example, below are situation leading to conflict of interest:

- Financial interest of employees with/or their family, in activities with suppliers, clients or competitors;
- Use their own role within the company or information gained at work, creating a conflict between personal and company interests;
- Carry out any other type of work activities for clients, supplier and competitors;
- Take payments, favors or benefits by people or companies involved or about to start a business relationship with TEKNA SHIPPING.

It is forbidden receive or offer, directly or indirectly, payments or tangible benefits to influence or reward third parties.

Any employee accepting presents or favors not attributed as a consideration must refuse and inform the management.

7 – Confidentiality

Confidential information and classified data belonging to the company cannot be used, communicated or unveiled unless authorized by management or their owners.

In addition to specific regulations in place, confidential information are considered all details handled throughout company activities or circulation and usage that could harm or damage the company and/or making an unmerited gain for the employee. Information and data used by all employees during their duties, are company property, they cannot be used or disclosed without authorization.

TEKAN SHIPPING is committed to protect all confidential information of its employees and partners, used during its activities, and to avoid any improper use.

It is against the law and forbidden any form of exploitation, direct or indirect, as well as the usage of confidential information for lucrative purpose, direct investments or mediator.

8 - External Communication through media

External communication must be rightful, correct and clear to protect company reputation. TEKNA SHIPPIN



has to come across precise and concise and consistent with press and media. All personal details must be used and kept only by authorized employees

9 - Breach of Code of Conduct

Breach of Code of Conduct damages the trusted relation between TEKNA SHIPPING and employee. Company may take disciplinary action against any non-observance of Code of Conduct including written warnings, demotions, dismissal or involving law enforcement agencies, based on Work Act 8.