



# The way we act



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# Introduction

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# Why we have a Code of conduct?

**In the dynamic and interconnected world of international shipping, where our ships traverse vast oceans, and our operations span continents, robust and globally applicable compliance policies are essential. As a global shipping company, we understand the multifaceted challenges and opportunities of navigating diverse regulatory frameworks, cultural landscapes and business environments.**

The Amasus Code of Conduct is a guiding document that underlines our unwavering commitment to ethical and professional conduct, legal compliance, and responsible governance in every facet of our comprehensive operations - employees, stakeholders, customers, business partners and suppliers. This policy relates to Amasus Shipping B.V. and the directly affiliated Amasus group companies.

## **Protecting integrity, well-being and sustainability**

At the heart of our Code of Conduct lies the goal of protecting the integrity of our operations, our employees' well-being, and our business' sustainability. This policy is not just a document; it is a strategic imperative that guides our behaviour, mitigates risk, enhances our reputation, and helps us to build trust with our customers, partners, and stakeholders worldwide.



Protecting the integrity of our operations, our employees' well-being, and our business' sustainability.

# The DNA behind our Code of Conduct

**This Code of Conduct is shaped by the values that course through our DNA, the 4 Cs inspired by the rich legacy and resourcefulness of generations of designers and engineers, captains and navigators – including our seafaring ancestors in Groningen, the Netherlands. At Amasus we are:**

## **Curious**

We explore, question, and improve to uncover what is good, right, and sustainable.

## **Creative**

With a highly diversified fleet, we foster originality, approach obstacles as gateways to innovation, and engineer to redefine what's possible.

## **Non-Conformist**

We embrace bold, unconventional thinking, turning norms and regulations into opportunities for long-term innovation.

## **Collaborative**

We thrive in cross-disciplinary, cross-cultural collaboration, valuing people, partnerships, and a culture in which today's learners are tomorrow's leaders.

“ ”

We are curious,  
creative, non-confirmist  
and collaborative.



# How to use the Code of Conduct

**This Code of Conduct is a living document that guides decision-making and daily operations for all Amasus stakeholders. Across Amasus, we count on each other to live and work by the code and to make decisions that maintain trust, both within our company and between our company and the outside world. We expect the same from our consultants, stakeholders and suppliers, subsidiaries and joint venture partners.**

## How to read

For each aspect of conduct that we address in this document, we offer a short description. This helps you to know how you can enact it. In addition to this description, each of the conduct topics comes with some practical do's and don'ts. These appear under the headings 'We do:' and 'We do not:', and will help you to understand exactly what conduct is and is not expected.

## We do:

- ✓ Assure our staff and stakeholders of safe working conditions.

## How to apply

As a company, we implement and ground the decisions laid down in this document in many ways. For example:

- Integrate in onboarding and training of staff;
- Apply in daily operations as a reference point for resolving ethical dilemmas, ensuring environmental responsibility, and promoting safe and inclusive workplace practices;
- Share with suppliers, customers, and partners to set clear expectations and foster ethical collaboration throughout the supply chain;
- Encourage open communication, so that employees and partners can always and freely raise concerns or ask questions;

We review and update our Code of Conduct regularly.

## We do not:

- ✗ Knowingly do business with organisations or individuals involved in the exploitation of children.

“ ”

Across Amasus, we count on each other to live and work by the code.

# Speak up: How to raise concern?

**This Code of Conduct cannot possibly cover every situation you may encounter in your day-to-day work. This means it is essential to use common sense in everything you do, and to ask for help if you're ever unsure about the correct course of action.**

## **3 questions to ask yourself if you're unsure what to do**

If you're unsure, ask yourself these three questions as appropriate:

- 1. Does this attitude or behaviour reflect our Amasus values?**
- 2. Is it fitting for Amasus and my colleagues?**  
If in doubt, ask several people around you.
- 3. Would this course of action be seen as good if everyone knew about it?** Again, if in doubt, ask a few different people what they think.

## **If the answer is 'No'**

If you can answer all three questions with 'yes', your course of action is most likely appropriate, and you can confidently go ahead. If the answer to one or more of these questions is 'no' or 'not sure', stop and ask for help. In any and every situation you're allowed to ask for help. It is a good and right thing to do.

## **Speak up right way**

Did you see or hear about something that may go against our Code of Conduct or may be illegal or unethical? Share your concerns right away; no concern is too small to report. Cooperate fully and honestly in any internal investigations.

“ ”

Together, let's create the kind of workplace where we all feel comfortable raising questions and concerns, and feel supported when we do.



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# 1. Speak without fear

**As a company, we know it takes courage to come forward and share your concerns. We will not retaliate or permit retaliation against anyone who, in good faith, reports possible misconduct or legal violations to us or any government agency or assists in investigating misconduct or legal violations. We will not retaliate or permit retaliation against anyone who raises questions or concerns (whistle blows) about company activities.**

Regardless of who you contact, we want you to rest assured that you are doing the right thing, and that your problem will be handled quickly and appropriately. We thoroughly investigate reports of misconduct and only release information to those who need it to resolve the issue.

Do you have a question, concern, or problem? In most cases, your manager should be your first point of contact. They are likely best positioned to understand your concerns and take appropriate action. If you do not feel comfortable talking to your manager, or if you have already shared a problem and feel it is not being addressed appropriately, please contact HR or another management or board member.

## **We do:**

- ✓ Create a safe place for people who want to speak up.
- ✓ Listen carefully to any concerns that are expressed.
- ✓ Investigate reports of misconduct.

## **We do not:**

- ✗ Silence individuals.
- ✗ Retaliate or threaten those who speak up.

“ ”

Anyone should be treated with dignity and respect.



## 2. Respect others

**At Amasus, we are successful because of our people. We are one team, representing many ideas, experiences, and backgrounds. We value each other's contributions and believe everyone should have an equal opportunity to succeed. This is essential to advancing our goals and initiatives.**

This means we expect every team member to do their part in keeping keep the Amasus workplace a diverse, inclusive, and respectful workplace by creating a positive environment and embracing the many strengths, talents and perspectives our diverse colleagues bring.

### We do:

- ✓ Treat others as we would like to be treated ourselves.
- ✓ Celebrate our diversity by listening and being open to different points of view.
- ✓ Speak out against suspected discrimination or harassment based on race, colour, gender, national origin, age, religion, citizenship, disability, medical condition, veteran status, marital status, or any other characteristic protected by law.
- ✓ Promote a work environment free from intimidation, bullying, and abusive behaviour - physical, verbal, or visual.

### We do not:

- ✗ Exclude or judge people on the basis of their background or culture.
- ✗ Rule out ideas and perspectives simply because they are different or new.

“ ”

We are successful  
because of our people.



## 3. Promote a safe Amasus

**We attach great importance to the safety of every employee. We look out for each other, because our people are our greatest asset – and because we want to foster a safe, caring culture.**

We follow safety procedures and promote a safety culture. We adhere to a zero-tolerance policy regarding acts or threats of violence. Possessing, using, or distributing alcohol or illegal drugs is prohibited by our policies, because substance abuse can impair judgment, performance, and safety. If an occasion occurs when the moderate drinking alcoholic beverages while doing business with the company is permitted, be sure to comply with all laws and company policies and principles.

Be alert and look around you. If you see a situation that could endanger others, take action, and continually work to keep yourself and your colleagues injury-free. Every employee is authorised to take immediate action for the safety of people, regardless of position, title, or responsibility.

“ ”

Be alert and look around you.

### We do:

- ✓ Follow all safety procedures.
- ✓ Look out for the safety of others and ourselves.
- ✓ Act with common sense.
- ✓ When drinking is allowed, exercise moderation.

### We do not:

- ✗ Ignore safety issues.
- ✗ Take safety risks or put others at risk.
- ✗ Tolerate any substance abuse within the company.



## 4. Support human rights

**We support the principles embodied in the United Nations' Universal Declaration of Human Rights and do not knowingly do business with individuals or companies that participate in the exploitation of children – including child labour, corporal punishment, forced or prison labour and human trafficking. We are committed to fair labour practices wherever we operate, respecting the rights of each individual and complying with national and international legislation. We respect the rights of every individual and believe that anyone directly or indirectly employed by Amasus should be treated with dignity and respect, be paid fair wages based on applicable law, and be assured of safe working conditions. Our commitment extends to our suppliers. We only work with selected suppliers that are equally committed to fair labour practices.**

### **We do:**

- ✓ Allocate fair wages.
- ✓ Respect each individual's human rights.

### **We do not:**

- ✗ Knowingly treat anyone unfairly.
- ✗ Tolerate exploitation of any kind.

“ ”

Anyone should be treated with dignity and respect.



## 5. Deliver quality, service and safety

**We want all stakeholders interacting with Amasus to know that we will offer them the highest levels of quality, service and safety. We do this, because we want them to trust us. We maintain these high levels of quality, service and safety by meeting or exceeding our own internal standards as well as those laid down by legislators, regulators and our industry.**

“ ”

We will offer the highest levels of quality.

### **We do:**

- ✓ Make sure all our staff and supply chain partners have access to clear information about our own internal standards and all external standards.
- ✓ Ensure staff and stakeholders of safe working conditions.

### **We do not:**

- ✗ Knowingly carry out any operations in which quality, service and safety levels are at risk of being compromised.
- ✗ Ignore any external or internal standards for the sake of convenience, profitability or any other reason.



## 6. Keep private information private

**Our employees and stakeholders trust us to protect their personal information. We respect their privacy and carefully handle all personal data. We strictly adhere to all relevant data privacy laws in how we responsibly collect, store, use, share, transfer, and dispose of, personal data. We expect and instruct all our employees to do the same. Following the processes and practices we have in place helps us to protect our and our stakeholders' networks, computers, programmes, and data from attack, damage, or unauthorised access.**

“ ”

We strictly adhere to all relevant data privacy laws.

### **We do:**

- ✓ Use all personal information entrusted to us only as intended.

### **We do not:**

- ✗ Share any personal data in any unauthorised ways with anyone inside or outside Amasus.



## 7. Respect our partners

**We value our suppliers, clients and other business relationships – including federal, state and local governments – all over the world and work hard to be responsible partners. We want all our relationships to be based on mutual respect and trust. We choose our partners accordingly, making objective decisions based on quality, service, price, availability, and reliability. We recognise that the requirements laid down in government contracts are often stricter than those in other contracts, and in each of these situations, we follow the rules wholeheartedly, honestly and transparently.**

“ ”

We work hard to be responsible partners.

### **We do:**

- ✓ Follow contractual agreements.
- ✓ Cooperate with government bodies regarding inspections, investigations or requests for information.
- ✓ Tell the truth when responding to a government request.

### **We do not:**

- ✗ Cut ethical corners.
- ✗ Mislead anyone, interfere with the work of inspectors or investigators, or conceal, destroy, or alter documents.



## 8. Avoid bribery

**We compete based on the quality of our services. We work honestly and with integrity. We do not offer, accept, or allow others to bribe you. This means we do everything we can to prevent bribery by others doing business on our behalf.**

As a company, we are responsible not only for your actions as an employee, but also for the actions of any third party who represents us.

Remember that bribes can be something other than cash. A gift, a favour, or even a loan or job offer can be considered a bribe if it is offered in exchange for a decision. Before offering anything of value yourself, check our policies and ask questions about the do's and don'ts. Laws in some countries impose higher penalties for bribing government officials, but for us, it's simple: bribery - of anyone, in any organisation, at any level - is always wrong.

“ ”

Check our policies and ask questions about the do's and don'ts.

### We do:

- ✓ Work with honesty and integrity.
- ✓ Compete on the basis of the quality of our services.
- ✓ Avoid all forms of bribery.
- ✓ Check with others if we are unsure.

### We do not:

- ✗ Take or offer bribes.
- ✗ Condone any form of bribery.



## 9. Rules about gifts and entertainment

**We do not give or receive any gifts or entertainment that are inappropriate. An occasional gift or entertainment offer is often considered a regular part of business. But sometimes, even such well-intentioned gifts or offers can cross the line. Any gift that creates a sense of obligation, or compromises your professional judgment, is always inappropriate.**

Make sure you follow the rules and take into account any special restrictions regarding gifts, offers and entertainment. For example, giving something of value to a government official can be wrong.

Always ask for help from management if you are uncertain what to do, or whether your course of action is appropriate.

“ ”

We make sure to know and follow the rules.

### We do:

- ✓ Avoid inappropriate gifts or entertainment.
- ✓ Check the rules or ask for advice if uncertain about a gift, an offer, or a form of entertainment.

### We do not:

- ✗ Offer or receive inappropriate gifts or entertainment.
- ✗ Give or receive anything that creates a sense of obligation, or compromises our professional judgment.



# 10. Protect our assets

**Our assets include everything Amasus owns or uses to conduct business.**

**We are good stewards of our physical, electronic, and information assets.**

**Physical and electronic assets such as furniture, equipment, tools, inventory, computer hardware, and software are provided so that you can do your job.**

Information is also crucial; confidential information and intellectual property result from significant business investment and years of hard work. Each of us is charged with caring for these assets. This means we must be proactive in protecting them from loss, damage, theft, waste, and misuse. When you help protect these assets, you help preserve our competitive advantage.

When using personal assets, such as phones, computers, email, and the internet, ensure that your use does not interfere with any work or violate our policies or the law. Anything you write, transmit, download, or store on our systems is proprietary, and we may monitor your usage.

Protect our systems. Ensure the physical security of the hardware assigned to you. Protect your password(s). Report any property or equipment that is damaged, unsafe, or in need of repair. Don't lend, sell, or give anything away unless you are authorised to do so. Do not install unauthorised software, applications, hardware, or storage devices on your computer or access our network through unauthorised applications or devices. Do not use unlicensed software or make copies of software for use at home or by anyone else. Be alert for phishing scams or other attempts to steal sensitive personal or company information. Do not open suspicious links in emails, even if you know the source.

## **We do:**

- ✓ Value Amasus' and other people assets.
- ✓ Treat assets with care.
- ✓ Report on assets that are damaged, unsafe or in need of repair.
- ✓ Protect our passwords.

## **We do not:**

- ✗ Deliberately cause damage to assets.
- ✗ Share sensitive information inappropriately.
- ✗ Expose Amasus' assets or systems to the risk of loss, damage, theft, waste, or misuse.

“ ”

Protect our systems. Ensure the physical security of the hardware assigned to you. Protect your password(s).



# 11. Avoid conflicts of interest

**A conflict of interest can arise when something you do outside the workplace interferes with the work you do in the workplace. We do not let personal interests influence our business decisions on Amasus' behalf.**

When making decisions regarding Amasus, you must act in our company's best business interests and avoid even the appearance of a conflict. If you can recognise a potential conflict, you can prevent one.

If you become aware that a personal activity, investment, interest, or association could create a conflict of interest, or even compromise your objectivity or ability to make impartial business decisions, immediately report it to your manager, HR, or the director. Many conflicts can be easily avoided or addressed if promptly appropriately disclosed and managed.

“ ”

We act in our company's best business interests.

## **We do:**

- ✓ Act in the company's best interest.
- ✓ Ask for advice if we are unsure whether or not we are facing a conflict of interest.
- ✓ Report potential conflicts of interest to the manager, HR or the directors.

## **We do not:**

- ✗ Knowingly enter into compromising situations.
- ✗ Engage in personal activities that may conflict with the interests of Amasus.



## 12. Share only when authorised

**We ensure that the information shared about our company is consistent, accurate, and complete. To ensure that the information communicated to stakeholders, regulatory authorities, or the public is accurate and complete, we have designated individuals as our official corporate spokespersons. This means we may only make public statements about Amasus if we are authorised to do so.**

“ ”

Information shared about our company is consistent, accurate, and complete.

### **We do:**

- ✓ Understand the value sending one clear message.
- ✓ Ensure that information we share about Amasus is authorised, consistent, accurate and complete.

### **We do not:**

- ✗ Make public statements about Amasus unless authorised to do so.



## 13. Be friendly to our planet

**Our planet faces many challenges, and we understand that we are part of the solution. We strive to conduct business in an environmentally responsible manner. We are committed to compliance with all applicable environmental laws and regulations. We have set ambitious goals to minimise our ecological footprint, for instance, by reducing greenhouse gas emissions, reducing waste, and limiting water and energy use in our organisation.**

“ ”

We have set ambitious goals to minimise our ecological footprint.

### **We do:**

- ✓ Treat our planet with the utmost respect.
- ✓ Act in compliance with all applicable environmental laws and regulations.

### **We do not:**

- ✗ Do anything that compromises the integrity of our planet.



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# Conclusion

**The Code of Conduct is at the core of our commitment to ethical and legal conduct on a global level and the Amasus Global Compliance Policy.**

## **Code of Conduct for all employees, contractors and stakeholders**

This Code of Conduct extends to all employees, contractors, and stakeholders, whether at sea or on land. It acts as a unifying force that ensures our compliance approach is consistent, while enabling us to respect the diverse regulatory environments in which we operate.

## **Transparency, reporting, and accountability**

The pillars of effective compliance are transparency, reporting, and accountability. Our policies establish clear channels for reporting concerns, encourage employees to act without fear of retaliation, and establish clear measures for enforcing compliance standards. Maintaining these standards requires an ongoing effort and investment in regular training to update our organisation on evolving regulations and compliance practices.

“

We are committed to ethical and legal conduct on a global level.



# A word of thanks

**In closing, we thank our employees, leadership team, and everyone involved for their commitment to these values. As we continue to navigate the seas of compliance, we are confident that our Global Compliance Policy is an ethical compass. It guides us in our pursuit of a responsible and ethical future for Amasus and the global community. We want to build a legacy of integrity, compliance, and sustainable success, not just with words on paper, but through our commitment to positively impacting the world around us.**

“ ”

We continue to navigate the seas of compliance.

## **Management of Amasus Shipping B.V.**

January 2025

This Code of Conduct has been compiled under the responsibility of the management of Amasus and is periodically revised and updated if necessary.



# Contact us



# Contact

**Please reach out to us if you would like to talk to us about or know more about any of the topics below:**

- ✓ How our Code of Conduct as part of our Global Compliance Policy helps us maintain the highest standards of ethical and legal business conduct, regardless of geographical boundaries;
- ✓ How our Compliance Policy aims to protect the integrity of our operations, our employees' well-being, and the sustainability of our business;
- ✓ The unwavering principles that form the foundation of our compliance policy, including safety and environmental management, trade compliance, anti-bribery and corruption, data protection, and labour standards;
- ✓ The importance of a robust reporting and accountability structure in effective compliance, including clear channels for reporting and liability measures;
- ✓ The regular training programmes and culture of constant improvement we invest in to support our commitment to compliance.

**Contact us through e-mail: [info@amasus.nl](mailto:info@amasus.nl)**

**Call us +31 (0)596 649 800**

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Please reach out to us if you would like to talk to us.