

COPENHAGEN MALMÖ PORT CODE OF CONDUCT



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1. PURPOSE

CMP's ambition is to act responsibly and transparently in all aspects of our business operations. Our Code of Conduct sets out the framework for how we conduct our business and the standards of behaviour we expect and promote among our employees, suppliers and business partners in order to achieve the goal of creating the most attractive port in the Nordics.

The purpose of the Code of Conduct is to clarify the expectations that apply to how we conduct ourselves, treat each other and work within the company. It describes not only what we stand for, but also what we distance ourselves from.

We see our Code of Conduct as a tool to assist us in:

1. clarifying CMP's expectations for all our employees, suppliers and partners,
2. highlighting our shared values,
3. preventing inappropriate or abusive behaviour.

This Code of Conduct should be seen as part of CMP's governance, and is consistent with our other policies and guidelines.

At CMP we seek to support a culture that:

- Prioritises safety and sustainability with responsibility for both people and the environment.
- Promotes cooperative efforts and well-being in the workplace, where everyone feels welcome and is granted the space to be themselves.
- Rests on our core values – Respect, Ambition and Community – which permeates everything we do, how we treat each other and the decisions we make.

2. CMP's CODE OF CONDUCT DEFINITIONS AND APPLICATION

Our Code of Conduct applies to everyone who works for CMP, whether they are an employee, a consultant, from a staffing agency or a temporary worker. Additionally the Code of Conduct also applies to CMP's customers, suppliers and other external partners.

3. OUR VALUES

CMP's CORE VALUES

Respect, Ambition and Community

Our culture is driven by our people and by a healthy work environment where everyone thrives and supports our values. In our daily work, these core values serve as guidelines for how we treat each other, and our customers, suppliers, and partners. These core values should also make it easier for us to make the right decisions in various different situations, contribute to increased efficiency, and better enable us to achieve our goals. These core values should be easy to comprehend and adhere to, while capturing the essence of our business operations and our culture.

RESPECT

We respect each other's work, thoughts and ideas, for who we are as a person.

AMBITION

We are in a constant state of development, and strive to run a little faster, do a bit more in our work, and have extremely high ambitions for the future. We also take the initiative to explore new ways to be an innovative leader in our industry.

COMMUNITY

When working together, we perform better. We all contribute with our knowledge, expertise and experience. Together we make the community stronger with collaborative efforts throughout our organisation.

4. CMP's CODE OF CONDUCT

4.1

The customer is at the center

We strive to be a customer-oriented service company. Our ambition in relation to our customers is to consistently:

- continue to further develop our service offerings,
- be transparent,
- keep our promises and deliver as agreed without compromising on quality or safety.

4.2

Legal requirements

We require all of our employees, suppliers and partners to comply with all applicable national and international legislation and regulations, as well as the licensing or permitting requirements, policies, guidelines, and safety and work regulations that apply at any given time within CMP. If the requirements or objectives/direction of this Code of Conduct differs from what is stated in the applicable legislation or regulation, the law takes precedence over the Code of Conduct. To the extent that the Code of Conduct imposes stricter compliance requirements than an applicable statute or regulation, these stricter requirements in our Code of Conduct must be adhered to.

Everyone working for CMP also has a responsibility to promote a culture of compliance with this Code of Conduct, including by actively encouraging colleagues to adhere to the principles of this Code of Conduct.

4.3

Equal treatment

CMP must be a workplace where everyone feels welcome. Therefore we have zero tolerance for any form of discriminatory behaviour, sexual or physical harassment, or other forms of discriminatory treatment. In accordance with the principles of the UN Global Compact, we support and respect international human rights, and we do not tolerate any conduct that violates them. This includes any form of forced or child labour.

We place great value on diversity and strive for an inclusive working environment where all CMP employees are treated with respect, fairness and equality – irrespective of gender, age, religion, ethnic background or other personal circumstances that may give rise to discrimination.

For us, we feel it is important to have the right person in the right place, so that both our employees and CMP can develop in the best possible way. Everyone at CMP must have the same equal opportunities for career and skills development, and we recruit and base our salaries based solely on the individual's expertise and experience.



4.4

Bullying, intimidation, sexual harassment or victimisation

We have zero tolerance in regards to all forms of abusive behaviour, whether it involves threats, physical violence, bullying, sexual harassment, or any other form of harmful conduct violating personal integrity.

Preventing abusive behaviour of all kinds is a shared responsibility.

- **Managers** within CMP have the overall responsibility for establishing the proper framework for a good working environment and must themselves also comply with the Code of Conduct.
- **All employees, suppliers and partners** have a responsibility to respond appropriately if they experience offensive behaviour, and to themselves adhere to the Code of Conduct.
- **Safety representatives** have an obligation to provide advice and guidance to colleagues who may be subjected to abusive behaviour, and also to any colleagues who may be accused of abusive behaviour.

4.5

Freedom of association

At CMP we recognise the right of employees to freely organise and engage in collective bargaining, and we expect all persons and entities performing work in connection with CMP to acknowledge and respect this right.

4.6

Prevention of money laundering and financing of terrorism

We have zero tolerance for and distance ourselves from all forms of money laundering and financing of terrorism. We require all CMP employees, suppliers and partners to have the same approach to combating money laundering and the financing of terrorism.

At CMP, we do not accept payments in cash from our customers or partners. If you as a CMP employee are offered cash payment from a customer, or are faced with a similar situation, you must refuse to accept the payment.

4.7

Measures against corruption and inappropriate gifts

We are committed to maintaining a high level of integrity and work ethics in all our activities and decisions, and therefore have zero tolerance for any form of corruption, extortion, embezzlement, bribery or similar practices or behaviour. Counteracting this is an important part of our risk management and of great significance to us.

As an employee, you must not accept any bribes, gifts or entertainment from CMP's suppliers, customers or partners, unless the gifts are purely symbolic in nature. The acceptance of a gift or a benefit (or anything of similar nature) from a supplier is not permissible if it affects or could affect your decision or how you perform your assigned tasks/job responsibilities. This refers to a gift of high financial value or something of significant personal value to you as the recipient. The starting point is that gifts or benefits received may not exceed SEK 550 (or the equivalent); however the assessment is to be made in each individual case. The crucial factor is that all gifts and/or other items received in the course of business should have a value appropriate to the relevant occasion and business relationship. We do not accept or give gifts or other benefits if it might be perceived that the intention is to unduly influence a business decision or otherwise put our integrity and independence into question. We expect that all of our suppliers and partners will share this same approach.

If you as an employee receive an invitation to disproportionately expensive entertainment events, such as tickets for the theatre, revues, football matches, or a dinner or gift that is not of a purely symbolic nature, you must politely decline.

If you are uncertain about whether a gift is of excessive value, what constitutes "disproportionately expensive," what is considered "purely symbolic," or if you observe others receiving disproportionately expensive gifts and/or invitations to events, you are obligated to contact your line manager or the Legal Department.

4.8

Conflicts of interest

We desire to ensure consistency and transparency in our decisions. Everyone employed by CMP must carry out their work and make decisions in accordance with the "arm's length principle". This also applies to all CMP suppliers and external partners. We have zero tolerance for nepotism, including preferential treatment of friends, family or other close relatives in matters of recruitment, procurement/purchasing, selection of suppliers or partners, nor in any other situation related to our business operations.

4.9

Occupational health and safety

Occupational health and safety at work at CMP, and well as safety in general, is our top priority. There is a certain risk of accidents associated with working in any port, something we proactively work to minimise by using various tools, inspections and controls along with the automation of processes.

Our ambition is to be an accident-free workplace and a place where everyone can work safely. A vitally important part of this ambition is to ensure that you, as an employee, have the required skills to perform your job duties safely. To assist you in making the right choice, before you begin new tasks, we will ensure that you receive guidance on how to best protect our shared occupational health and safety in your work, and we will continuously update this information as necessary.

We want to avoid anything that could affect your safety or that of your colleagues. This includes i.a. having zero tolerance for drugs/illicit substances or alcohol in the workplace. In addition, CMP work areas are to be "smoke-free," with smoking permitted only in designated areas. We train our employees in safety and safe behaviour, conduct unannounced random drug and alcohol tests, and offer assistance in quitting smoking.

4.10

Sustainability, climate change and the environment

Our overall environmental and sustainability performance is guided by CMP's strategy, which is adopted by the company's management and Board of Directors. With this in mind, we at CMP have established guidelines for CMP's sustainability work based on CMP's sustainability goals, focusing on areas such as waste recycling, energy efficiency, and taking measures to promote a pleasant workplace.

To minimise our environmental impact, we work according to the precautionary principle, which means that we act proactively and take preventive measures to prevent deviations and incidents before they lead to negative environmental impacts. We also endeavour to apply the strictest environmental requirements for CMP in its entirety, i.e. the national regulations in Denmark and Sweden, wherever possible.

CMP will conduct its business operations in accordance with applicable environmental permits and comply with the environmental requirements established by the relevant regulatory authorities.

Our business operations have a direct impact on the environment via our consumption of energy and the related emissions released into the air. We therefore strive to minimise our environmental impacts, including our CO2 footprint, by developing and implementing sustainable solutions and efficient work processes along with investing in fossil-free energy.

We desire to make efforts to raise awareness of the choices you as an employee can make to reduce climate impact.

Everyone working for CMP is obligated to contribute to achieving our sustainability goals. In day-to-day work, this includes reducing energy consumption and minimising waste thereby contributing to a more sustainable workplace. It's about small and big choices where together - we make a difference. Everyone has a responsibility to understand the environmental and sustainability requirements imposed on them in their work through our guidelines and policies, and those who have a position as manager/team leader also have a responsibility to ensure that the employees under them work in accordance with our sustainability goals.

4.11

Business ethics

Our business ethics are based on the principle of doing what is right – even when nobody is looking – and always prioritising responsibility over short-term gain. We operate with integrity, transparency and respect for laws and regulations as well as generally accepted international standards, and this is also to be the basis for all decisions taken in the course of our business operations.

We are committed to fair competition and to complying with applicable competition law/antitrust law. We clearly reject and distance ourselves from all forms of corruption, undue influence, bribery and conflicts of interest, and ensure that purchases and business relationships are conducted objectively and with transparency.

In our dealings with our various stakeholders, we are committed to act with transparency and responsibility, ensuring that CMP's actions contribute to a trusting and sustainable business community.

4.12

Branding and communication

Ethical communication

We must communicate in a manner that is truthful, clear, credible, and consistent with the established strategy. All internal and external communications must be based on facts, be clear, and correctly reflect our business operations. We strengthen trust in CMP by avoiding providing misleading information and by communicating with respect for our employees, customers, suppliers and other external partners.

We take a clear stance against greenwashing – meaning portraying a product or service as much more environmentally-friendly than it is in reality – and ensure that our sustainability messages are substantiated, verifiable and consistent with actual actions and behaviour.

Responsible branding

The CMP brand reflects our values, our strategy and our responsibility to the environment, human rights, and the community-at-large. All communications that build the CMP brand must be consistent with our sustainability goals and ethical commitments, while contributing to a positive impact on the communities where we operate. We communicate our progress and challenges with honest transparency and integrity, and avoid exaggerating or embellishment of our work. Openness, accuracy and clarity are important guiding principles in everything CMP communicates.

4.13

Protection of property and equipment

At CMP, we value the protection of our buildings, machines, vehicles, computers and other operational equipment. When you, as an employee, are on our premises or in the vicinity of CMP's property and equipment, or when you take CMP's equipment outside these areas, you must therefore exercise due responsibility to ensure that no injury or damage occurs and that there is no risk of theft. Similarly, as an employee you must be aware of and comply with the guidelines of the current CMP Information Security Policy and applicable IT Guidelines. You are also obliged to participate continuously in mandatory training programmes offered internally.

4.14

Data protection and personal privacy

Personal privacy and protection of personal data are fundamental rights. We are committed to protecting the personal data of our employees and our business partners. Personal data may only be processed within the limits of applicable law and in accordance with the EU's General Data Protection Regulation (GDPR). We take our legal and ethical responsibility to always ensure the privacy of individuals very seriously.

All personal data and confidential information must be stored securely, be organised and updated as necessary, and may not be stored for longer than necessary. Personal data may only be used for a specific and lawful purpose.

More comprehensive information concerning personal data is available in our current GDPR Policy. Information obtained at CMP must always be treated as confidential and may be shared with external parties only with consent.

We also expect all our customers, suppliers and partners to fully comply with applicable data protection rules at all times.

5. REPORTING NON-COMPLIANCE WITH THE CODE OF CONDUCT

CMP's whistleblowing function aims to establish a platform where our employees, suppliers, partners and other stakeholders can anonymously and securely report serious irregularities, information or observations of illegalities via an impartial representative.

Any employee, supplier or partner who either becomes aware of or suspects a violation of the CMP Code of Conduct is encouraged to contact us directly or via CMP's whistleblower platform.

For our employees, the whistleblower process supplements and complements internal dialogue and openness, and is intended primarily for situations where the matter is so serious that it cannot or should not be handled directly with your immediate manager or within HR. More comprehensive information concerning CMP's whistleblowing process is available in the CMP Whistleblowing Policy.

6. VIOLATION AND PENALTIES

If CMP suspects that an employee, supplier, or partner is not complying with our Code of Conduct, as a general rule we will inform the person/entity concerned of the suspicion of the alleged violation.

Our starting point is to engage in constructive dialogue with the aim of rectifying the situation and thereby encouraging greater responsibility and ethical behaviour, rather than exclusion or termination of the cooperation.

A violation or breach of CMP's Code of Conduct may result in disciplinary action or other measures if dialogue cannot or is deemed unable to remedy the violation. Sanctions may include, for example, consequences under employment law which, depending on the nature

of the offence, may lead to reassignment, a warning or, in serious cases, dismissal or other termination of employment. If the violation/breach can be attributed to a supplier or partner, there may be contractual consequences for the supplier or partner in question, including termination of a partnership/supplier relationship in accordance with the contract and/or exclusion from future cooperation with CMP.

It is the responsibility of the individual/entity to seek advice if they are unsure whether a decision or action is within the law or this Code of Conduct. Factors such as external pressures, time constraints, or financial limitations are not a valid excuse for failing to strictly comply with this Code of Conduct and applicable laws.

7. QUESTIONS AND CURRENT VERSION

If you have any questions regarding this Code of Conduct or its interpretation, please contact the Legal Department or write to cmport@cmport.com.

Current version

This Code of Conduct (approved by the Board of Directors on 4 December 2025) became effective as of 1 January 2026, and replaces the previous "Internal Code of Conduct CMP" dated 1 April 2021 and the "Code of Conduct for Collaborative Partners" dated 10 April 2021.

The version of this Code of Conduct published on our website should always be considered the current and authoritative version.





A SAFE HAVEN
A SEA OF
OPPORTUNITIES

