

CODE OF CONDUCT for Suppliers

INTRODUCTION

Zeaborn Ship Management is an international ship management company with its headquarters in Hamburg, Germany.

The company, its management and all employees on board and ashore are committed to conducting our business activities in full compliance with applicable laws, rules and regulations all over the world. We strive at continuously improving our social and environmental performance throughout our supply chain around the world and work against any form of corruption.

This Code of Conduct for Suppliers defines our basic requirements in the area of human rights and working conditions, the environmental and business integrity. It is based on our Code of Conduct as well as on the UN Global Compact which ZEABORN Ship Management's predecessor E.R. Schiffahrt has joined in April 2012.

Zeaborn Ship Management expects its business partners, but especially its suppliers and subcontractors to respect the principles described in this Code of Conduct for Suppliers as well as declared in the UN Global Compact and implement at least equivalent standards in their own business.

I) LEGAL COMPLIANCE

Zeaborn Ship Management expects its suppliers and subcontractors to conduct business in compliance with legal requirements, applicable laws, rules and regulations in all countries and regions where they carry out their business activities.

II) HUMAN RIGHTS

We expect our suppliers and subcontractors to support and protect the International Bill of Human Rights within their sphere of influence and throughout their business activities.

The declared company's policy neither to permit nor tolerate, but to prevent any kind of discrimination and/or harassment of its employees, business partners, suppliers on board and ashore on the grounds of race or the ethnic origin, gender, religion or belief, disability, age or sexual orientation.

III) LABOUR, WORKING CONDITIONS

Suppliers and subcontractors shall prohibit any use of forced, bounded, indentured or involuntary prison labour in their organization or their supply chain. We expect our suppliers and subcontractors to respect the rights of their employees to form a workers council, collective bargaining unit or other employee representations.

We furthermore expect our suppliers and subcontractors to prohibit and refrain from any kind of child labour within their organization or supply chain.

Applicable national statute on working times shall be respected.

IV) HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

Zeaborn Ship Management expects its suppliers and subcontractors to fully comply with applicable national and international standards and guidelines, like OHSAS 18001, Maritime Labour Convention and International labour standards (ILO) governing health and safety at work to prevent their employees and third parties from injuries and ill health.

Our suppliers and subcontractors are expected to implement and maintain a suitable environmental management system (e.g. in accordance with ISO 14001, or national equivalent) to minimize environmental impact and hazards.

V) ANTI CORRUPTION AND BRIBERY

At Zeaborn Ship Management we tolerate no form of corruption or bribery and expect the same of our suppliers and subcontractors. In particular our suppliers and subcontractors are expected to ensure that their employees and subcontractors do not offer, promise or grant any advantages to any employee of Zeaborn Ship Management, public authorities and third parties, with the goal of securing an order award or any other form of preferential treatment in their business transactions.

Our suppliers and subcontractors shall refrain from presenting any invitations or gifts to our employees in order to gain any form of influence. They should refrain from sending any kind of gifts to our company or to our employees. All received gifts will be either returned or donated in line with our sponsoring policy. Invitations are only reasonable, if they are predominantly business related.

We expect our suppliers and subcontractors to fully comply with national and international rules and regulation for the prevention of money laundering and not to participate in money laundering activities. All business transactions between Zeaborn Ship Management and its suppliers and subcontractors shall be made without using money in cash.

VI) ANTITRUST AND FAIR COMPETITION

As open competition is an elementary component of the free-market system, we expect our suppliers to respect antitrust laws and to support fair business transaction practices.

REFERENCES

In preparing this Code of Conduct for Suppliers many external references, such as but not limited to the following, were consulted:

United Nations Global Compact

www.unglobalcompact.org

Universal Declaration of Human Rights

www.un.org/en/rights

International Labour Standards (ILO)

www.ilo.org/global/standards/lang--en/index.htm

Maritime Labour Convention

<http://www.ilo.org/global/standards/maritime-labour-convention/lang--en/index.htm>

ISO 14001 Environmental Management

<http://www.iso.org/iso/iso14000>

Code of Conduct of Zeaborn Ship Management

<https://zea-ship.com/en/company/responsibility.php>

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