

### OUR CODE OF CONDUCT

At NVL Group, we operate in a national and international environment in which we value responsible, reliable and sustainable conduct. With our Code of Conduct, we set out the principles with which we want to honour our responsibilities in dealing with the law and with our business partners and employees, as well as with society and the environment.

Our Code of Conduct plays an essential role in everything we do, at every shipyard and in every office of NVL Group. Accordingly, it complements all national and international requirements applicable to our business. We expect our business partners to comply with rules and regulations comparable to our Code of Conduct.

### OUR CONDUCT IN COMPLIANCE WITH THE LAW

At NVL Group, we adhere to the law. Particularly, we are committed to conducting business in compliance with the latest anti-corruption, antitrust, anti-money-laundering and data protection laws.

Our own human rights, anti-discrimination, anti-slavery and anti-child-labour principles – along with those globally agreed on from the OECD, the ICERD and the UN – are all standards which we adhere to in our daily business and human interactions.

# **OUR CONDUCT TOWARDS BUSINESS PARTNERS**

At NVL Group, we have a strong customer focus and are renowned for our high-quality and reliable services. We always treat our business partners and competitors with respect and fairness. We make decisions in the interests of the company, avoiding conflicts of interest. We see our numerous subcontractors as our partners.

In turn, we commit our partners to act in line with our Code of Conduct.

# **OUR CONDUCT TOWARDS EMPLOYEES**

At NVL Group, we treat our employees respectfully, pay fair wages and salaries, promote equal opportunities, offer professional training, and combat all forms of discrimination. We are committed to compliance with all applicable occupational health and safety regulations. We aim to achieve our goal of zero incidents by actively raising awareness amongst our employees.

The management and employee representatives work together and have a relationship built on years of trust. We also expect all employees to comply with our Code of Conduct.

2/2

### OUR CONDUCT TOWARDS THE ENVIRONMENT AND SOCIETY

At NVL Group, we respect our environment and climate, and we implement sustainability standards, striving to reduce the use of non-renewable resources and energy. We aim to reduce our carbon footprint as far as reasonably possible in line with international standards and take care to purchase and offer sustainable products and to support renewable technologies. Our goal is to reduce pollution, and we work hard to prevent environmental damage.

We give due consideration to society by respecting the personal rights of others, and we avoid political positioning. We realise how integrity, honesty, ethical business practices, respect and fairness are essential to our success and encourage these at all levels.

Bremen, 31. August 2021

Dr. Klaus Borgschulte

Tim Wagner

Dirk Malgowski

Lena Ströbele