

LANGH Group - CODE OF CONDUCT

General

Langh Group comprises shipping company Langh Ship and green tech company Langh Tech. Langh Group also provides special containers for demanding transportation needs, such as transportation units for coils, sheets, bulk and liquids. The companies are family-owned and live up to the spirit of founder Hans Langh, which is characterized by innovation and the desire to find new solutions to practical problems.

Langh Ship is a Finnish shipping company transporting steel, bulk and container goods. The modern fleet is capable of operating in challenging Northern conditions. The ships operate under Finnish or Portuguese flag.

Langh Tech designs and produces scrubbers for SOx removal from exhaust gases, water treatment units for closed loop scrubbers, ballast water management systems, and solutions for onboard carbon capture (OCC).

Langh Group's Code of Conduct

1. Purpose

This Code of Conduct outlines the principles and standards of behaviour expected of all personnel involved in our business and operations. It aims to promote a safe, respectful, and environmentally responsible working environment, ensuring compliance with international laws, regulations and maritime industry standards.

2. Scope

This Code applies to all employees, and we also expect all contractors, subcontractors, and any third parties involved in our business operations to comply with the code and abide to the same ethical principles. Langh Group reserves the right to conduct audits if deemed necessary.

Compliance is mandatory and any breaches will be taken seriously.

3. Principles of Conduct

3.1 Ethics and business conduct

At Langh Group, we conduct ourselves with integrity, honesty, and respect at all times.

Langh Group commits itself to following ethical standards and business practices, and complying with all applicable international, national, and local laws and regulations. We maintain a professional demeanour and avoid conflicts of interest. We will not engage in any kind of bribery, corruption or fraud. Anyone, who witnesses or suspects illegal or unethical behaviour should report this to either HR, an executive or via the whistleblower channels and/or to the appropriate authorities. Every report will be taken seriously and investigated.

We aim at providing an inclusive workplace, where employees feel valued and safe. At Langh Group, we do not tolerate any form of harassment, bullying, or discrimination based on race, gender, religion, nationality, age, sexual orientation, or disability.

We communicate openly and honestly and always try to find mutually satisfactory and amicable solutions.

Langh Group promotes long-term relationships with our employees, suppliers and customers. We offer quality customer contacts and always strive to keep our service level at the highest possible. When it comes to our own products, we prioritize responsible manufacturing and product traceability in order to ensure product quality. Lang Ship and Langh Tech are ISO9001-certified.

3.2 Social responsibility

Langh Group does not allow child labour or forced labour in any form and expects its suppliers and subcontractors to abide to the same code. We respect human rights and promote equality, diversity, inclusion and non-discriminatory behaviour. We find it important to offer our employees a comfortable working environment for them to be able to do their best. Langh Group aims towards transparency between the different stakeholders and fulfils its responsibility as an employer.

3.3 Health and safety

Langh Group is committed to ensuring a healthy, safe and secure workplace at sea and ashore for our employees, customers and subcontractors. We care for the health and wellbeing of our employees and offer them quality health care. Langh Group follows the maritime safety and security codes and promotes safety thinking within the whole Group. Our goal is to have zero incidents, and we strive for continuous assessment and improvement of safety at the workplace. We aim to minimize occupational hazards and preventing and managing emergencies. Staff onboard shall always wear appropriate personal protective equipment (PPE) and ensure it is in good condition. Participation in regular safety trainings and drills is mandatory. Our policy is to never engage in behaviour that could endanger oneself or others.

It is strictly prohibited to be under the influence of alcohol or illegal substances while on duty. Witness or suspect of substance abuse should be reported to a supervisor or HR to investigate this further and to ensure the safety of people and operations.

Any safety-related observations should be reported immediately to the safety officer onboard or the H&S representative ashore. We encourage our employees to come forward with suggestions whenever they see room for safety-related improvements.

3.4 Environmental Responsibility

Langh Group is committed to safeguarding the environment and to minimize the environmental footprint of its' business and operations. We adhere to all applicable regulations and strive to continuously reduce our emissions other environmental impact. Any environmental incidents or violations shall be reported immediately.

With our company Langh Tech, we develop innovative and environmentally friendly solutions for the maritime industry to comply with relevant rules and regulations. Our mission is to find the best sustainable solutions for cleaner air and seas for the coming generations and to combat global warming. We work tirelessly to seek out the most effective methods to reduce SOx emissions and waste in the maritime industry.

As a clean tech organisation, Langh Tech puts effort into designing sustainable products through selection of raw materials, production processes and means of waste and emission handling. Langh Tech has been a

forerunner in the development of the water treatment systems used in the closed loop mode, which ensures the eco-friendliness of the Langh Tech systems.

3.4 Confidentiality and Information Security

We safeguard confidential company information and do not disclose it to unauthorized parties. Data protection and information security are taken seriously, and data is only used in accordance with our data policy. Any breach of confidentiality or information security should be reported to IT, the Executive Management or via our whistleblower channels.

4. Reporting Violations

Employees who suspect violations of this Code of Conduct shall report this to the executive management or anonymously via our whistle blowing channels. Reports will be treated confidentially and in accordance with our whistle-blowing policy. Retaliation against individuals who report violations in good faith is strictly prohibited.

5. Disciplinary Action

Any breach or suspected breach of this Code of Conduct will be investigated and may result in a warning and/or disciplinary action, up to and including termination of employment or contract. Disciplinary actions will be carried out in accordance with our company policies and applicable laws.

6. Continuous Improvement

This Code of Conduct is regularly reviewed and updated as necessary to reflect changes in laws, regulations, and industry best practices. We encourage feedback and suggestions from our employees for continuous improvement.

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