



Code of Conduct

2024



Index

Introduction	3
Strong Values	3
Why we have a Code of Conduct	3
To whom this Code of Conduct applies	4
Whistleblower	4
Compliance with legislation	4
Statement from the CEO	5
Workplace Commitment	6
Health, Safety & Well-being	6
Working Conditions	6
Equality	7
Employee Growth and Development	7
Personal Data Protection (GDPR)	8
Document Protection	8
Confidentiality	8
IT (NIS2)	9
ISO 9001, 14001, 45001	9
Interested Parties	10
Invitations & Presents	10
Fraud, Corruption, Bribery & Money Laundering	11
Social Commitment	12
Environment & Sustainability	12
Corporate Social Responsibility	12
External Announcements	13
Contact Information	14

Introduction

Our Code of Conduct is our foundation and describes how all employees at Scanel International shall work. We are proud of the ethical guidelines that we have developed for our business and our daily activities. We have committed employees who support our strong values, which makes us a unique company. This is the base line to be an attractive company that attracts new employees and makes customers choose us. We develop strength, knowledge, trust and pride among our employees, which strengthens our business.



Scanel International has a strong and good reputation, which is a responsibility all Scanel International employees care about; we therefore do not accept any unethical behaviour, and we act immediately in any case of such behaviour.

Strong Values

Our values and our Code of Conduct describe, how we do things at Scanel International, but it doesn't exempt us from thinking for ourselves. We constantly try to move in the right direction, through knowledge and mutual guidance. We believe that a unique company with strong values is created through open dialogue and ethical behaviour. We prioritize diversity in our work while delivering the best solutions. We promote a culture, characterized by openness and fairness, in which we treat each other with trust and respect.

Why we have a Code of Conduct

Scanel International's Code of Conduct is a guide based on our internal policies, procedures and values, and it describes the way in which Scanel International's employees understand our values and what expectations we have in terms of daily behaviour. It is also a guide on how we shall behave in teams as well as during cooperation with customers, subcontractors and other parties. We also use it to find ethical answers in given situations, where this is needed or if we are unsure of something. We run a company with



a high level of integrity and transparency. We comply with our Code of Conduct and never compromise, and we strive to create an environment in which everyone has the opportunity to express their opinion.

To whom this Code of Conduct applies

All employees at Scanel International, no matter status or job function, shall comply with the principles and demands described in this Code of Conduct. If the respective employee is a leader or supervisor, this person has a special responsibility to lead the way and set the good example in terms of adherence to the Code of Conduct.

Whistleblower

Scanel International's employees undertake to do business with a high level of integrity and transparency, which depends on a culture, where the individual feels safe to report incidents of non-compliance with our Code of Conduct, including suspicion of illegal or unethical behaviour. All employees are responsible for, and have a duty to report any suspicious behaviour, to the manager or the manager's superior. If the employee does not feel confident to do this, the employee can alternatively talk to the HR department. Another solution is the Scanel International whistleblower system. All employees or interested parties can use the whistleblower system to report observations, serious offenses such as bribery, wiretapping and fraud as well as harassment and other serious matters. The report can be made anonymously via the Scanel International website. Any whistleblower report will be taken seriously, and is handled by the top management.

Compliance with legislation

Scanel International complies with all Danish public rules and regulations. Furthermore, our Code of Conduct also applies to our standards regarding for instance minimum employment age. However, our standards and politics never conflict with local law. Norms or local practices must never take priority over legal compliance requirements.

with regulatory





Statement from the CEO

Scanel International has a healthy and good business. We care for the physical, mental and social well-being of all employees, and we are committed to providing safe working conditions, in a working environment with diversity in language and culture, and organized to ensure that our suppliers work respectfully according to the same principles. We want our parts and services to be of first-class workmanship, so that customers always associate Scanel International with quality, sustainability, good design and reliability, and so that our parts and services live up to the promises stated in our quotations, which go hand in hand with our ESG performance. We ensure continuous improving of environmental and sustainability aspects, together with the rest of the world; no one can handle this global challenge alone. We must work together globally and bring businesses, governments and society together. At the end of the day, it is all about treating people with respect and obtaining continuous improvements, which make it a better tomorrow.



Jakob Tvilling Grønkjær
CEO at Scanel International A/S



Workplace Commitment

The work at Scanel International is not only about delivering the best solutions and helping our customers prosper. It is also about handling Scanel International assets responsibly and creating a fair, healthy and safe workplace, where we can all improve our professional skills and develop as individuals. You must contribute to this development by displaying professional behaviour and by promoting an inclusive culture in which everyone feels welcome.

Health, Safety & Well-being

Health and safety are about preventing accidents and promoting a healthy and safe working environment for our employees, the people who work with us and the public in contact with our projects. This is a basic priority for Scanel International, and our goal is a non-hazardous environment and well-being that can be defined as a feeling of satisfaction. We strive to constantly develop a working environment, which promotes health, safety and well-being. We believe that visible leadership is of significant importance to a program for health, safety and well-being. We offer strong, personal security and support accident prevention practices in our company. We offer training and education in health and security in a way that is relevant to the specific working conditions of our employees. We continuously make measurable improvements towards our goal of offering a harm-free environment.

Working Conditions

Our standards are based on our values and on the UN Declaration of Human Rights, the UN conventions from the ILO (International Labor Organization) and the UN guidelines for business and human rights.

We recognize human rights and are careful not to cause negative impacts on human rights, and we always handle possible incidents or risks. We do not accept any form of child labour or forced labour at our workplaces or in our supply chain, including practices such as illegal or wrongful detention of salaries. It is considered child labour when a person is under the minimum age as





required by local legislation. We only allow working hours, wages and benefits that are in compliance with national and local legislation. We recognize and respect the right to form collective agreements, labour agreements and our employees' freedom of assembly as well as the right to collectively bargained agreements where this is permitted by law. We work to promote good relations with labour organizations, trade unions and employee representatives. We have a dialogue with our employees to ensure that their rights are respected.

Equality

Equality includes all the conditions that make us unique, for instance age, gender, sexual



orientation, ethnicity, religion, belief, language, education and marital status. At Scanel International, there is room for diversity of opinions, perspectives and attitudes in groups. We believe that a composed and inclusive workplace delivers better solutions to customers. We offer equal treatment and equal opportunities for everyone without regard to looks, ethnicity, national origin, religion or beliefs, gender, sexual orientation, gender identity or expression, age, disability, marital status, family status or other characteristics, which are protected through legislation and regulations. Our Equal Employment Opportunity Policy includes all aspects of employment relations. We do not accept disrespectful behaviour, bullying, discrimination, harassment or unwanted sexual approach.

Employee Growth and Development

Opportunities for personal growth and development help encourage employees to develop their talents and potential. It enables employees to use their new skills and competences to further improve the performance of the individual team. We believe that our employees are our most important asset. We support our employees to grow and develop, both personally and professionally. We offer opportunities for training and development to our employees, so they can improve their knowledge and skills. We encourage our employees to develop and learn by networking and disseminating best practice.



Personal Data Protection (GDPR)

Data protection is about protecting the personal integrity, when we process personal data. The definition of personal data and the legislative requirements for the protection of this information is compiled according to the GDPR rules. Personal information for instance includes birthday, contact details, names of family members, personal health information, photographs and identity number. We ensure that any use of personal data - collection, registration, storage and deletion - takes place in accordance with applicable legislation and regulations. We respect the individual's right to the protection of their own person information. We protect the personal data of our employees and other stakeholders. We ensure that only persons, who have a reasonable need for personal data in order to carry out their jobs responsibly, get access to this personal data. We ensure that all persons, who have access to personal data, take actions to protect them. We ensure that personal data is not stored for a longer period of time than necessary to fulfil their purpose.

Document Protection

Scanel International has internal procedure descriptions and registrations such as documents and reports business-related information, which means that our documents and financial reporting show a true picture of the business's condition and workflow, at all times. All financial reporting is done according to International Financial Reporting Standards (IFRS) as well as relevant policies and rules at Scanel International.

We also store non-financial documents related to quality, health, safety, environment, HR, salary, training and order documentation. We believe that correct registration and handling of documents is crucial to conducting business with integrity and transparency.

All sensitive documentation is protected against unauthorized access in a secure environment. All customer information, registration and documentation is handled with high confidentiality and protection.

Confidentiality

We protect our processes and business information, because it is of great importance to competitiveness, and because we must maintain the trust of our stakeholders. Confidential information may include business plans, financial documents, customer information, detailed information about projects, which we offer or carry out, pricing information, personal records and conditions, drawings, allegations and



investigations on reported misconduct, financial and accounting data and business relationships and methods.

For new employees, we do not ask for confidential information about their previous job. We take all reasonable measures to prevent that confidential information comes into the hands of individuals, who have no need or right to the information under the performance of his or her work.

IT (NIS2)

Scanel International has an IT Security Policy, which contains information about risk management, the systematic information, backup, antivirus and maintenance system that Scanel International continuously monitors. We train our employees in how to safely navigate on the internet, avoid mail phishing, use the IT equipment inside and outside Scanel International. We protect data with encryption where it is necessary. Scanel International has an IT contingency plan, in the case we are exposed to a breach or a hacker attack, which means that we can be up and running again within short time. We carry out internal audits at regular intervals, to monitor and ensure continued compliance with the procedures, on the same terms as one of the requirements in ISO27001. With the procedures within network, information and security implemented in Scanel International, we confirm that we meet the requirements of NIS 2, and we ensure that our subcontractors also work to meet these requirements.

ISO 9001, 14001, 45001

Scanel International is ISO certified by ISO9001, ISO14001 and ISO45001. Scanel International does not only have the certificates for the request from customers; we believe that by having a structured process as described in the ISO standards, and complying with these rules in the daily work with quality, environment and working environment, we create a company in which all employees undertake to contribute to improving all processes. Scanel International has a QHSE and Sustainability Manager, who monitors and handles tasks within these respective areas.

We are proud of our quality and innovation, and we know that it benefits both our customers and Scanel International that we deliver high quality. We strive to deliver quality work in all our activities, and we focus on continued improvement. We work with our stakeholders to deliver products and services that meet or exceed their expectations. We recognize and make efforts to remedy deficiencies in our work, which is in accordance with our contractual obligations.



Market Commitment

The company's social commitment is an important way to engage and invest in the communities in which we have activities. We believe that our social commitment is based on our reputation as a good corporate player, and this helps us establish long-term relationships with our customers and stakeholders.

Interested Parties

We are a fair company and we conduct business in line with the Scanel International values, as the company we want to be. Our stakeholders include employees, customers, shareholders, authorities, banks, subcontractors, municipalities, class societies, insurance companies and other parties, with whom we have an agreement to deliver goods and services. Scanel International always tries to predict customer needs and exceed expectations, but we do not compromise on our values in relation to any of our stakeholders.

We have a responsibility to our stakeholders to make decisions that do not provide personal gain. In case of potential conflicts of interest, reference is made to compliance with the relevant Scanel International policies and management.

Invitations & Presents

Invitations: Companies may offer invitations to their customers and business partners who aim to increase business. Invitations may include representation, meals, sporting events and travel.

Presents: A present is an object that is given voluntarily without expecting anything in return. When presents are given in the right way, they leave no impression of influencing business decisions in an inappropriate manner. When invitations and presents are given in an inappropriate way, it can create a conflict of interest or give the impression of bribery.

We do not ask for, accept or offer invitations or presents, which may influence – or give the impression of influencing our business decisions or decisions with those we work with. Regardless of whether invitations and presents are given or received, it must be done in an appropriate manner. It is the responsibility of each department to specify an invitation and present policy with amount limits, which must be approved by Scanel International. All employees must apply for approvals in advance before an initiative can be initiated on behalf of Scanel International, in accordance with corporate social commitment.

Fraud, Corruption, Bribery & Money Laundering

Fraud occurs when a person intentionally tries to cheat another person, acts dishonestly, abuses his position to obtain a material advantage or implicates another person in such actions. Fraud usually occurs when a person wrongfully attempts to obtain money, property or services. It is an activity, which entails penalty in most countries. Scanel International always acts reliably, fairly and works within the framework of legislation.

Corruption includes conflicts of interest, embezzlement, bribery, kickbacks, extortion and fraud. Corruption undermines legitimate business activities, distorts competition, damages brands and exposes companies and individuals to risk. Bribery is an attempt to exert influence on others and influence the person concerned to perform a duty, by offering or promising an inappropriate advantage. Such benefit may also consist of the payment of a cash sum or similar, but can also be anything else that represents a value. We are committed to conducting business with a high level of integrity and cannot accept any form of bribery or corruption. We avoid situations that may give the impression of bribery, corruption or other forms of inappropriate behaviour. We refrain from asking for, receiving, offering or paying bribes, neither directly or through external parties acting on our behalf. Through our agreements, we also oblige subcontractors to follow the same rules and procedures for fighting corruption and bribery, which applies to Scanel International.

Money laundering is a way of disguising the origin of criminal funds or assets and thereby making it appear as if they came from a legitimate source. We only do business with honest customers and business partners who engage in legitimate activities and use funds originating from legitimate sources. In accordance with applicable law, we notify relevant authorities if we reasonably suspect money laundering.



Social Commitment

We want to continue to be an attractive workplace and business partner. Through equality, safety, mutual respect and by covering the employees' needs within health, well-being and personal development, we create a composed and good workplace, which is also well-known by society.

We constantly strive to be the best at what we do, and to understand our customers' needs and also the needs of their customers. We are proud of the quality and results we deliver, and this is some of what we are known for today by our customers and partners.

Environment & Sustainability

Scanel International always tries to be in front and we are committed to protecting the environment. We believe that we can make a significant contribution to a more sustainable world. We therefore take this work seriously and want to improve the environmental performance of our activities, projects, products and services throughout the entire life cycle.



Corporate Social Responsibility

Scanel International performs regular employee satisfaction surveys and makes sure that all employees are satisfied with the working conditions and that social well-being continues to be in focus. Scanel International arranges sport activities and social events for employees, and we celebrate all our successes together.

Scanel International adheres to a collective agreement, and we are proud of our culture, characterized by openness and fairness, in which we treat each other with trust and respect, regardless of age, gender, sexual orientation, ethnicity, religion, belief or language.



We value and encourage a diversity of opinions, attitudes, perspectives and positions in groups. We believe that power and true knowledge also comes through experience; therefore, we try to hold on to employees, also after the age of +65 years, in order to pass on experience to the younger generation.

We are open to taking in trainees and apprentices, and we contribute to helping young people start a career as electricians, blacksmiths and within administrative work. We are proud to have 28 apprentices at Scanel International and we support the future and foundation of young people, which is very important for future business at Scanel International and for society.

External Announcements

External announcements are an important part of our marketing and branding efforts. There are different kinds of announcements - to customers, potential customers, partners, suppliers, investors and other stakeholders. It can be letters to the media, press releases, statements, posts on social media, publications, advertising and public presentations. Our announcements are characterized by an honest tone, accuracy and reliability. We are open in our dialogue with interested parties. We respond to inquiries and communicate with involved parties in a professional manner, either with acceptance from or through our CEO.



Contact Information

Yard & Marine

Dennis Thordal Lavrsen
COO
Email: dtl@scanel.dk
Tel: +45 2222 5256

Green Energy

Torben Hvid Larsen
COO
Email: thl@scanel.dk
Tel: +45 2223 5526

Industry

Dennis Thordal Lavrsen
COO
Email: dtl@scanel.dk
Tel: +45 2222 5256

Infrastructure

Dennis Thordal Lavrsen
COO
Email: dtl@scanel.dk
Tel: +45 2222 5256

Enterprise

Jakob Tvilling Grønkjær
CEO
Email: jgt@scanel.dk
Tel: +45 2222 5330



Scanel International A/S

Havnepladsen 12

9900 Frederikshavn

Denmark

CVR: 66630315

Tel: +45 9622 3342

info@scanel.dk

www.scanel.dk