

Gotlandsbolaget Code of Conduct

ADOPTED BY THE BOARD OF DIRECTORS
10/06/2025

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1. Introduction

Gotlandsbolaget's Code of Conduct applies to all operations within the Group and covers all employees and managers. We all have a shared responsibility to adhere to these principles in the course of our daily work. This Code of Conduct should be viewed as an overarching framework that is supplemented in certain sections by area-specific policies.

Our core values guide us in what we do and how we relate to one another:

We are dedicated – Our commitment drives us. Whether it's navigating our vessels or working to improve our guest and passenger experience, we are committed to contributing to positive development.

We work together – We are at our best when we work together, both on land and at sea. Through diversity, equity and inclusion, we create an environment where every employee is important. We welcome everyone and create opportunities for individuals to develop.

We deliver – We keep our promises and create results. From daily crossings and customer experiences to long-term goals, we work consistently and with focus to achieve our objectives and meet expectations.

We are on the move – We move forward together. Whether it's adopting new technology, developing our working environment or customer experiences, everyone should be part of the journey as we evolve.

We provide service – Our passengers and guests are at the heart of everything we do. We enjoy their company, we listen, show that we care and develop our services to meet their needs. Every trip and every stay should leave a positive impression.

Our values go hand in hand with the areas where we take special responsibility and set clear requirements for ourselves and our partners.

Our shared commitment is what makes the difference. By following our Code of Conduct, living our values, and putting them into action, we reinforce Gotlandsbolaget's trustworthiness and create a future where sustainability, business acumen, and responsibility go hand in hand.

Together, we are building something bigger – for today and for tomorrow's generations.

Björn Nilsson, CEO, Gotlandsbolaget

2. Responsibility and compliance

All employees at Gotlandsbolaget have a shared responsibility to follow our Code of Conduct and actively work towards compliance with it. This means that every individual, regardless of role or position, must act in accordance with the rules and is encouraged to report any suspected deviations.

Suppliers, partners, and other external parties are subject to our Supplier Code of Conduct, which clarifies the requirements and expectations we place on external relationships to ensure that our values, principles, and legal requirements are upheld throughout the value chain.

What is expected of our employees?

- All employees are expected to read and apply the Code of Conduct in the course of their daily work.
- Everyone should contribute to a culture where openness and responsibility are central values.
- Suspected violations should be reported through established reporting channels, such as the whistleblower system, without fear of reprisals.

2.1 How to report a violation

At Gotlandsbolaget, we value and work for an open and secure corporate culture where all employees can report suspected violations without fear of negative consequences. If you discover an action that violates our Code of Conduct, there are multiple ways to report it.

How and where are violations reported?

- Immediate supervisor, manager, supervisor or department head
- HR
- A member of Gotlandsbolaget's Group Executive Board or the management team for the respective business
- Chairman of the Board of Gotlandsbolaget
- Gotlandsbolaget's whistleblower channel

Whilst reports can be made anonymously via Gotlandsbolaget's whistleblower channel, we encourage you to identify yourself to enable a fair and comprehensive investigation. We have zero tolerance for retaliation against anyone who reports a violation or who in good faith raises a concern.

You will find a link to the whistleblowing function on our intranet and on our external website.

2.2 Measures in the event of violation

If an employee violates our Code of Conduct, it is of utmost importance that the matter be handled promptly, correctly, and professionally. This is not only for the sake of the individual employee, but also to enable Gotlandsbolaget to take corrective action.

3. Business ethics and corporate responsibility

Acting responsibly means that we not only strive to comply with laws, regulations and international guidelines, but also take moral and ethical

responsibility in all business decisions. We expect all our employees and managers to adhere to high ethical standards, exercise good judgement and conduct business relationships with professionalism.

By integrating business ethics and corporate responsibility into everything we do, we strengthen trust in Gotlandsbolaget and contribute to a sustainable future, where we take responsibility for our impact on people, the environment and the economy.

3.1 Bribery and corruption

Gotlandsbolaget does not accept bribes or corruption. All forms of undue influence, gifts or benefits that may influence business decisions are prohibited. We actively work to identify and prevent corruption risks in our operations and ensure that all business transactions are conducted in an ethical and lawful manner.

What is a bribe?

A bribe can be a gift, service, payment or other financial benefit offered, given or received with the aim of unduly influencing a business decision. Bribes can take many forms, such as entertainment, hospitality, donations and sponsorship.

Social events can be a natural part of business relationships and are permitted, provided that they are reasonable and appropriate in relation to the context. Gifts of minor value may also be given or received in the course of daily business activities, but these must not be of a value that could influence or be perceived to influence decisions – particularly in the case of public officials, state-owned companies, customers or suppliers.

3.2 Sanctions, competition and pricing

Gotlandsbolaget respects sanctions established by relevant authorities and international organisations. We do not intend to engage in trade, cooperation or transactions with persons, organisations or countries subject to sanctions. This includes the application of economic sanctions, trade restrictions or other restrictions established by sanctioning authorities.

Policy: Sanction policy

3.3 Private interests and agreements with related parties

At Gotlandsbolaget, we work to identify and manage potential conflicts of interest. We expect all employees to always act in the best interest of the company and avoid situations where personal relationships or financial interests may influence or conflict with business decisions. A conflict of interest may arise if an employee, directly or indirectly, has financial or personal relationships that may influence business decisions.

What might constitute a conflict of interest?

- Entering into agreements with related parties or companies in which an employee has a financial interest.
- Using one's position within the company for personal gain or to benefit family members or friends.
- Having a side job or other employment that affects work at Gotlandsbolaget or conflicts with the company's interests.

- Participating in decisions regarding a related party's employment, promotion, or business relationships.

3.4 Side jobs, other assignments or external activities

Gotlandsbolaget welcomes employees taking on external assignments and side jobs, as this can contribute to personal development and valuable experience. However, it is of utmost importance that such commitments do not adversely affect work performance or lead to any conflict of interest with Gotlandsbolaget.

What basic principles apply?

- A side job must not negatively impact the employee's ability to perform their duties effectively and professionally.
- All employees are obliged to inform their immediate manager of any side jobs that may affect their work or constitute a conflict of interest.
- Engaging in competing activities, directly or indirectly, is not permitted, as this may harm the company's business interests.
- Assignments with the potential to affect Gotlandsbolaget's reputation or relationships with customers, partners or other stakeholders should be avoided.
- Employees may not have ownership interests in companies that compete with Gotlandsbolaget without the express approval of their employer.
- If an employee holds a significant stake in a company that has business relations with Gotlandsbolaget, this must be reported and evaluated to ensure that there is no conflict of interest.

By maintaining transparent and clear management of side jobs and external commitments, we ensure that Gotlandsbolaget can conduct its business in a professional and ethical manner, while safeguarding our employees' opportunities for personal and professional development.

3.5 Money laundering and financial transparency

Gotlandsbolaget does not tolerate any form of financial crime. We adhere to applicable laws and regulations to prevent our business from being used to conceal illegally obtained funds or finance criminal activities. All employees have a responsibility to report suspicious activity.

What basic principles apply?

- We identify and verify our business partners, customers and suppliers through thorough background checks.
- We ensure that all transactions are conducted in a transparent and lawful manner.
- We interrogate and analyse transactions that deviate from normal business patterns or that may indicate attempts at money laundering.
- Suspicious activities are reported immediately to the Group Executive Board or management of the respective business, and if necessary, a report is made to the authorities in accordance with applicable legislation.

3.6 Protection of company assets and information

Gotlandsbolaget's expertise, business methods and intangible assets have commercial value. This includes, among other things, company names, logos, designs, business processes, business strategies and company information. All employees have a responsibility to protect and handle this information in a responsible manner to ensure the company's long-term competitiveness and integrity.

How is confidential information protected?

- Confidential information should only be shared with authorised parties and never with unauthorised parties, including family and friends.
- Business secrets and other sensitive information must not be discussed in public places, via unsecure communication channels or on social media.
- When collaborating with external parties, non-disclosure agreements (NDAs) must be drawn up to protect Gotlandsbolaget's interests.

How do we protect our digital and physical assets?

- We manage our physical and digital resources with care and ensure that they are used responsibly.
- All devices and systems containing sensitive information must be protected with passwords and security measures.
- Any suspected data breaches or information leaks must be reported immediately to the IT department.
- By protecting our information and assets, we strengthen Gotlandsbolaget's position in the market and ensure sustainable and ethical operations.

3.7 Communication

The Company shall provide accurate, relevant, clear and reliable information simultaneously to capital markets, society and the media. The Company complies with stock exchange and securities legislation as well as other laws, regulations and rules for listed companies in Sweden.

Policy: Information and insider policy

3.8 Social media and digital presence

Social media is an important channel for strengthening brands, creating engagement and engaging with stakeholders. Employees who use social media on behalf of the company are required to act professionally and responsibly. Confidential information must not be shared or discussed publicly, and communication must be aligned with the company's values and rules.

Policy: Information and insider policy

4 Human rights and working conditions

Gotlandsbolaget collaborates with suppliers, customers and local communities, which means we have a responsibility to respect and promote human rights both within our organisation and outside it. We are committed to fair working conditions and a corporate culture characterised by respect,

equality and dignity for all. We follow the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2011), the United Nations Guiding principles on Business and Human Rights (2011) and applicable EU directives.

As an employer, we have a special responsibility to ensure a safe and inclusive working environment for our employees. We promote a culture where everyone is treated with dignity and respect. Violations of human rights are not tolerated, and our respect for these rights applies as strongly on land as at sea.

4.1 Equity and Diversity

Gotlandsbolaget actively works to ensure an inclusive workplace offering equal opportunities for all and does not tolerate any form of discrimination. We see diversity as a strength and strive to create a work environment where everyone feels welcome and appreciated.

We do not accept:

- Discrimination based on gender, ethnicity, religion, age, disability, sexual orientation or any other form of discrimination
- Indirect discrimination through unequal working conditions
- Human rights violations
- Unequal opportunities — all employees are entitled to equal opportunities for development and promotion.

Policy: Equity and diversity policy

4.2 Harassment and discrimination

Gotlandsbolaget shall be a safe and inclusive workplace and actively works against harassment and offensive discrimination. .

At Gotlandsbolaget, we are committed to creating a safe, respectful, and welcoming work environment for everyone. Every employee should feel safe and comfortable at work, and a central part of our commitment is our zero tolerance for bullying, harassment and all forms of abusive treatment.

Policy: Policy against abusive victimisation

4.3 Child labour and labour law

Gotlandsbolaget undertakes to comply with international conventions and national legislation on labour law and children's rights. We do not accept any form of labour exploitation, regardless of gender or age.

We respect and value our commitments to our employees with regard to national laws and agreements on social security, working conditions and collective agreements. Salaries and other benefits must always comply with national laws, applicable agreements and generally accepted standards.

We support the right to safe and healthy working conditions for everyone. All work shall be performed in accordance with recognised and documented terms of employment that comply with the national legislation of the country in which the work is performed.

4.4 Freedom of association and collective bargaining

We respect our employees' right to organisation and collective bargaining. Trade union involvement should never lead to negative discrimination, and employee representatives must be given the opportunity to carry out their duties. We respect local laws and regulations regarding the formation of and membership in trade unions, both for our own staff and for our business partners.

5 Health and safety at Gotlandsbolaget

One of the most important aspects of being a responsible employer is ensuring the health and safety of our employees, passengers, guests and everyone affected by our operations. At Gotlandsbolaget, we strive to maintain a safe and healthy working environment, where safety is an integral part of our daily work.

It is not only our responsibility as an employer, but also the responsibility of every employee, to actively contribute to a safe workplace. By identifying risks and suggesting improvements to our procedures, we can work together to strengthen our safety culture while minimising accidents and health risks.

A strong safety culture, both at sea and on land, is based on a systematic approach and continuous improvement of our working environment standards. We strive to comply with applicable laws and regulations, both locally and internationally, to ensure that everyone who works within or with Gotlandsbolaget can do so in safe and secure conditions.

5.1 Health and balance

Well-being among our employees is crucial to our business, and we strive to create a workplace where everyone feels appreciated and supported in their pursuit of well-being.

We encourage a work-life balance and promote good physical and mental health. Workload should be reasonable and employees should be given the opportunity to recover .

5.2 Risks and protective measures

The safety of our employees, passengers and guests is our top priority, and we work systematically with risk management and protective measures to prevent accidents and injuries. Anyone working for Gotlandsbolaget must be able to do so in a safe and risk-aware manner. We want to create workplaces and products that are as safe and secure as possible for everyone. It is everyone's responsibility to be aware of and adhere to applicable rules and guidelines, and to take active responsibility for improving the working environment.

5.3 Alcohol- and drug-free workplace

At Gotlandsbolaget, we are committed to maintaining a safe and responsible working environment, where alcohol, drugs or other illicit substances are not permitted to affect work performance. Being under the influence during

working hours can pose serious risks to both the individual and those around them, which is why we follow clear preventive guidelines. Alcohol and drug testing may be conducted in accordance with applicable policy and legislation.

All employees, regardless of their role, have a responsibility to contribute to a safe working environment. If you suspect that a colleague is under the influence during working hours, it is important to take action – both to protect safety and to be able to offer support if needed.

On land, these rules apply throughout the entire working day, regardless of whether the work is performed in the office or remotely. For maritime employees, they apply throughout the entire period of service, both during and outside working hours.

5.4 Safety and security on board

Safety on and around vessels is a fundamental priority at Gotlandsbolaget. We work systematically to create a safe and secure working environment for employees, passengers and cargo, both at sea and on land. Our safety work is based on preventive measures, regular drills and clear procedures.

What steps we take

- Regular safety work and preparedness
- Handling of dangerous goods in accordance with regulations
- Emergency preparedness and medical preparedness
- Exercise caution in adverse weather conditions

6. Data security and cybersecurity

Gotlandsbolaget strives for transparent and ethical data management, where incorrect or illegal use of data is not permitted. Protecting our IT infrastructure, our systems and our data is a central part of our security work. We regularly take steps to strengthen cyber security, including training in phishing protection and secure data management.

It is the responsibility of all employees to actively contribute to robust cyber protection by working proactively to prevent data breaches, information leaks and operational disruptions.

What basic principles apply?

- Everyone must comply with established rules for information security, password management and protection against cyber threats.
- Each individual is responsible for acting cautiously and attentively in their handling of data and digital information.
- Security incidents must be reported and handled immediately; the IT department works continuously with preventive measures.

Policy: IT policy

6.1 Personal data and privacy protection

At Gotlandsbolaget, we will safeguard and protect the personal information that our customers, employees, suppliers and partners have entrusted to us. We are continuously working to develop and implement secure processes, which must ensure lawful and secure processing of personal data. Employees must handle sensitive information responsibly and in accordance with the company's guidelines for the secure processing of personal data.

Policy: IT policy

7. Climate- and environmental responsibility and sustainable development

At Gotlandsbolaget, we take long-term responsibility for reducing our climate and environmental impact and contributing to a sustainable future.

Through innovation, sustainable business decisions and cooperation with our stakeholders, we work to develop our business in balance with the climate, nature and society – at sea, on land and wherever we operate.

7.1 Sustainable resource use

Efficient and responsible use of natural resources is crucial to reducing our environmental impact and ensuring sustainable operations. Gotlandsbolaget works actively to optimise the energy efficiency of our operations with technical solutions wherever possible in order to streamline our use of resources without compromising on quality or safety.

7.2 Reduced climate impact

As part of the maritime and tourism industry, we are aware of our climate impact and are actively working to reduce greenhouse gas emissions.

What steps we take

- Investments in sustainable shipping, such as more energy-efficient vessels, alternative fuels and electrification of port operations.
- Efficient transport solutions, where we optimise routes and fuel consumption to reduce carbon dioxide emissions.
- Sustainable property development through energy-efficient buildings and renewable energy.
- Climate compensation and research, where we collaborate with academia and industry players to develop and implement new climate-smart solutions.

7.3 Effective food waste management

Gotlandsbolaget works actively to reduce food waste and manage food waste in a sustainable manner both on board our vessels and in our accommodation facilities. Through a combination of preventive measures, efficient processes and innovative solutions, we strive to minimise our environmental impact and optimise the use of resources.