

Supplier's Code of Conduct



Dear Partner,

We in Gotlandsbolaget;

- Destination Gotland
- Go Nordic Cruiseline, by Alvina Shipping A/S
- Gotland Hotels & Properties
- Gotlands Stuveri
- Gotland Tech Development

believe that building strong and long-term partnerships are essential to running a responsible, sustainable, and successful business. We are committed to working with suppliers who share our core values — integrity, quality, fairness, and respect for people and for the environment.

Essential sustainability is integrated throughout our operations and falls into the three main categories: Environment and climate, social responsibility and governance.

We work hard for reducing the climate and environmental impact of shipping and tourism. Destination Zero is our journey towards zero emissions for a sustainability on our full operation.

As an employer, we give high priority to our employees' well-being and development opportunities. We also contribute to the development of society – both through our investments in shipping and through our support for sports and culture etc.

We set high standards for ourselves, and we ask every part of our value chain to follow our example. We believe that together we can make a real difference. We see every supplier as a valued partner in our journey — one built on mutual trust, transparency, and shared ambition.

We look forward building meaningful and lasting relation and we thank you for your close attention to our Supplier Code of Conduct to enable the smoothest cooperation and secure a sustainable future together.

If you have any questions at any time, please do not hesitate to reach out to your designated contact person or to our Procurement team.

Innehåll

| | |
|---|----------|
| Supplier's Code of Conduct | 1 |
| Introduction | 4 |
| Our responsibility | 4 |
| General Principles | 4 |
| Scope | 5 |
| Requirements & Implementation | 6 |
| Due Diligence, Reporting & Actions | 7 |
| The Due Diligence Process | 7 |
| Reporting System | 7 |
| Actions | 8 |
| The Gotlandsbolaget Supplier Code of Conduct Principles & Standards | 8 |
| Health & Safety | 8 |
| Environmental Principles | 9 |
| Human & Labour Rights | 9 |
| Business Ethic | 10 |

Introduction

Our responsibility

Gotlandsbolaget, who are conducting its operation under the different subsidiaries mentioned above, are committed to conducting a responsible and sustainable business in respect of people, society, and the environment.

We recognize that this work starts in our own business and with our own practice, but to succeed we need to work in close corporation with our suppliers and business partners (Hereafter: “Partners”). Collaboration is a prerequisite to exercise responsible business conduct, and to realize the UN Sustainable Development Goals. Our Code of Conduct, policies and this Supplier Code of Conduct (Hereafter: “SCoC”) are coherent with our own approach to our work with responsible business conduct. We seek to continuously improve our practices, and we do so together with our partners.

Our partners can trust that our conduct and purchasing practices will not undermine but rather strengthen our mutual opportunity to deliver on our requirements.

We ask all our partners to commit to implementing and securing the standards, processes, and requirements of this SCoC in their own operations and throughout their supply chain.

We recognize that establishing the required standards and processes outlined in this SCoC requires both time and resources and we focus on our suppliers’ ability and willingness to demonstrate continuous improvements in meeting the requirements of the SCoC, and in improving their systems to manage adverse impacts on human and labour rights, the environment, including climate, anti-corruption, We feel confident that cooperation and transparent

dialogue can result in a more sustainable and efficient partnership from which both parties will benefit.

General Principles

This SCoC reflects our values and is based on the internationally agreed conventions, including, but not limited, to global recognized standards such as:

- [ISO and HSE standards](#),
- [International Labour Organisation’s \(ILO\) Declaration of the Fundamental Principles and Rights at Work](#),
- [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct \(2011\)](#),

- United Nations Guiding principles on Business and Human rights (2011),
- UN Convention Against Corruption,
- Rio Declaration on Environment and Development (1992),
- EU directives for Corporate Sustainability Due Diligence Directive (CS3D) (2023-2027).
- UN Global Compact's 10 Principles¹, and
- EU Privacy Directive (GDPR).

We expect and rely on that our Partners follow the same guidelines and by signing this SCoC commit to the same principles.

Working to implement these principles is a long and challenging process, but we require all our partners to join us in working actively with implementation and due diligence in their own business. Such efforts will be acknowledged as part of the foundation of a strong business partnership.

All suppliers are expected to comply with national legislation, regulations and applicable practices and industry standards as relevant to their business.

Scope

The scope of this SCoC is to describe the internationally recognized minimum standards on human and labour rights, the environment, including climate, anti-corruption and animal welfare as well as business ethics.

We expect all our partners to:

- establish systems to avoid and address adverse impacts on these minimum standards.
- show proof of commitment by adhering to this SCoC and upon request sharing relevant internal documents & procedures, and/or certifications of the production facility in accordance with its principles.

We ask our partners to commit to the requirements and terms of this SCoC and make sure the same are implemented throughout their supply chain and parent, subsidiary or affiliate entities, as well as all others with whom

¹ The 10 Principles of the United Nations Global Compact are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, the United Nations Convention against Corruption

they do business, including, suppliers, subcontractors, joint venture partners and other third parties. It shall be our suppliers' responsibility to ensure that their business relationships also have processes to manage their adverse impacts.

This SCoC also applies to workers who are engaged informally, on short-term contracts or on a part-time basis.

Where national laws provide for better or lesser protection, the higher standard shall apply. Where there is a conflict between national law etc. and the provisions of this SCoC, the supplier shall report this to us and try - to the extent possible - to honour the SCoC's provisions while adhering to national regulation.

Requirements & Implementation

We expect our partners to:

- adhere to applicable laws and practises of their areas of operation,
- acknowledge and commit to the adherence of responsible business principles of this SCoC,
- adopt a policy statement that is fully committed to the international principles and standards set forth in this SCoC which shall be approved by the suppliers' senior management and made publicly available and stipulates expectations from personnel, business partners and other parties directly linked to our partners' operations, products and/or services,
- assist Gotlandsbolaget in assessing our suppliers' compliance within this SCoC through a combination of audits, self-assessments and documentation reviews,
- cooperate in answering questions and to fully collaborate with Gotlandsbolaget in improving their systems of managing adverse impacts on the rules, and
- address any gaps in the implementation of this SCoC by establishing and implementing a time-bound improvement plan in consultation with Gotlandsbolaget.

Periodic reviews and follow-up audits as per our internal procedures can be conducted to monitor the compliance levels at our partners.

We expect and encourage our suppliers to develop and implement relevant management systems,

appropriate for a company of their size and industry to ensure compliance with applicable laws and

regulations and the requirements of the SCoC. As we are aware that the establishment of such processes takes time and resources, we are open to collaborate with our suppliers, share knowledge and experience, and ensure that our purchasing practices do not negatively impact their abilities to meet the requirements of the SCoC.

Due Diligence, Reporting & Actions

The Due Diligence Process

We expect partners to establish a process of continuous due diligence in relation to their actual and potential adverse impacts on the Rules. The process shall:

- regularly assess potential and actual impacts on the areas of fundamental responsibility,
- integrate impact assessment findings across relevant internal processes and functions, to ensure the prevention and mitigation of identified adverse impacts; and
- account for and report to Gotlandsbolaget how impacts are being addressed.

Reporting System

We expect our partners to have a reporting system to ensure that employees can voice grievances anonymously and without fear of reprisals on any aspect of this SCoC. All grievances should be investigated in a fair and timely manner.

We expect that suppliers account for and report to Gotlandsbolaget any relevant impact or breach to the SCoC.

We also welcome anyone within or outside of Gotlandsbolaget to report any potential or actual violations of this SCoC. We do not tolerate retaliation against persons making reports in good faith.

Concerns can be reported directly to Gotlandsbolaget's representative or managers or through our company's whistleblowing system that can be found on our homepage Gotlandsbolaget.se

Actions

The objective of this SCoC is to establish a basis for positive development of responsible procurement practices through regular dialogues and ongoing working relationships. However, in the incident of material breach of the SCoC, we reserve the right to take actions up to termination of contracts or in severe cases, to take legal actions against any partner, including, but not limited to first-tier suppliers, parent, subsidiary or affiliate entities, as well as all others with whom they do business, including, suppliers, subcontractors, joint venture partners and other third parties.

If a supplier discovers or is informed that it causes or contributes to an adverse impact, the supplier shall enable access to remedy through legitimate processes for those affected and/or inform the relevant authorities. The remediation process must be legitimate, accessible, predictable, equitable, transparent, aligned with international principles, continually updated and based around dialogue.

If a supplier did not cause nor contribute to an adverse impact, but is linked to it through its value chain, the supplier shall use its leverage to make the causing entity prevent reoccurrence, provide remedy for those affected and inform the relevant authorities.

The Gotlandsbolaget Supplier Code of Conduct Principles & Standards

Partners' public policy statements, continuous due diligence processes and reporting systems shall cover the internationally endorsed principles of the rules that are described below.

Health & Safety

Partners are expected to provide a safe, secure, and healthy working environment for all of their workforce. Partners are expected to:

1. Develop and implement effective health and safety management systems,
2. Evaluate consequence on health and safety of all relevant investment decisions,
3. Constantly seek ways to improve health & safety,
4. Ensure each employee shall have adequate training for the safe execution of assigned tasks and have sufficient knowledge of health & safety, appropriate to the position,
5. Monitor the effectiveness of the policy and associated management systems,
6. Annually review and set targets for health & safety,
7. Evaluate, control, and minimise risks associated with activities,
8. Have clear contingency plans for health, safety, and environmental damage in the event of incidents/accidents,

9. Report and investigate all incidents, accidents and near misses related to health, safety and environment and to implement preventative measures to avoid repetition,
10. Fulfil applicable compliance obligations and legal requirements on our operations.

Environmental Principles

Partners should establish processes that cover all impacts on the external environment, as stated in the Rio Declaration on Environment and Development. Emergency procedures to prevent and mitigate industrial accidents that can have an adverse environmental impact must be established. Partners must minimise their impact on the environment and comply with all relevant local and national environmental laws as well as international standards relevant to their activities' impacts.

We require all suppliers of relevant products — specifically those originating from cattle, cocoa, coffee, palm oil, rubber, soya, and wood — to comply with the [EU Deforestation Regulation \(EUDR\)](#).

Non-compliance may result in actions such as product delisting, suspension of partnership, or legal reporting.

We encourage all suppliers to go beyond compliance by adopting certified sustainable practices and enhancing traceability and sourcing systems.

Partners are expected to identify, manage, and minimize their impacts in the following areas:

1. Emissions to air,
2. Discharges to water and releases to land,
3. Use of raw materials, natural resources, and energy,
4. Animal welfare,
5. Emitted energy, including heat, waste, radiation, etc.
6. Physical attributes, e.g. noise, odour, colour, size, etc.
7. Impacts on biodiversity

Human & Labour Rights

We are committed to creating a working environment where workers are treated with dignity and respect, and we require our Partners to also adopt and enforce similar workplace practices. Partners are expected to manage adverse impacts on the below-listed human and labour rights, as stated in the International Bill of Human Rights and ILO's Declaration on Fundamental Principles and Rights at Work.

Business Ethic

Partners should establish adequate processes to conduct their business with highest ethical standards and should:

1. Documenting, recording, and keeping income and expenditure data available for periods determined by law, or, if unregulated, for a minimum of three years,
2. Not permitting corruption of public officials or private-to-private corruption, including both 'active' and 'passive' corruption (also referred as 'extortion' or 'solicitation'),
3. Not permitting payment of bribes or trading in influence in relation to business partners, government officials or employees, including through the use of intermediaries,
4. Not hiring government employees to do work that conflicts in any manner with the former official obligations of that employee,
5. Not permitting political contributions, charitable donations, and sponsorships in expectation of undue advantages,
6. Not offering or accepting excessive gifts, hospitality, entertainment, customer travel and expenses if not previously approved by a senior officer and explicitly recorded in the books of the business, naming the recipient or giver,
7. Not permitting use of facilitation payments, unless you are subject to threats or other coercion,
8. Abstaining from nepotism and cronyism,
9. Not permitting or participating in money laundering,
10. Adhere to anti-trust, other competition laws as well as all other relevant laws,
11. Disclose any potential or actual conflict of interest to Gotlandsbolaget,
12. Adhere to data privacy laws and comply to contractual requirements on confidentiality and information security.

Gotlandsbolaget is committed to supporting our suppliers in understanding and adhering to this SCoC. If there are any questions, uncertainties, or need for clarification regarding its content or interpretation, suppliers are encouraged to reach out at any time.

Gotlandsbolaget reserves its right to alter and modify this policy. The latest policy will always be published on our website.