

Code of Conduct

Topas Explorer Group and subsidiaries

Introduction

The purpose of this Code of Conduct is to set the standards for the business ethics, which all employees in the Topas Explorer Group (TEG) including all subsidiaries must comply with. Our commitment to CSR is based on the conviction that responsible business makes economic sense. We integrate CSR consideration into our business and operations and with responsibility and sustainability we base our work on a model aiming to understand the company's impact on society in combination with the focus of our stakeholders. With this in mind, we have formulated a CSR strategy that deals with environmental and social key concepts, including climate issues and human rights. We introduce this Code of Conduct as part of our programme to address sustainability issues across our business. At the same time, we want to make sure that our counterparts have the time to familiarize themselves with the values, which have been a driving force behind the development of TEG's business for more than 45 years.

TEG wants to act as a responsible business within the sectors in which we operate. We will achieve this through a continuous focus on areas where the company can identify significant impact on customers, stakeholders, suppliers, and the surrounding society. This will include, but not necessarily be limited to, influence on the environment and climate, social issues including labour rights, human rights and anti-corruption and bribery.

Our Code of Conduct

This Code of Conduct will be presented to all our suppliers and employees, and we expect them all to comply with the code as well as any relevant and applicable national law within the jurisdiction in which they operate. It is the responsibility of our suppliers to ensure that the Code of Conduct is enforced throughout whatever part of the value chain they control. More specifically we ask employees and suppliers to pay attention to the following:

Environment

Employees and suppliers shall continuously strive to minimize negative impact of their activities on the environment. This includes a proactive and responsible management of environmental aspects such as (but not limited to) natural resources, waste management, energy consumption, water use, noise, dust and odour emissions.

The employee and supplier shall continuously comply with local laws including environmental laws and any supplier shall formulate and enforce an environmental policy relevant to the type and size of its operation.

Health and Safety

TEG, its subsidiaries and all suppliers must ensure that the workplace is safe, hygienic, and healthy. TEG, its subsidiaries and all suppliers shall ensure that all means of transportation (airplanes, ships, busses, cars etc.) are safe, working properly and according to all local laws and regulations. This includes ensuring the workers' and guests' access to fire fighting equipment and safety equipment.

TEG, its subsidiaries and all suppliers are responsible for proper training of all its employees and the application of preventive measures, e.g. systems to detect, avoid and respond to potential risks to the health and safety of all employees and guests. TEG, its subsidiaries and all suppliers are responsible for all necessary safety demonstration and information in order to ensure the safety of employees and guests.

Labour and human rights

Forced labour is never to be used by any branch of TEG, its subsidiaries or any supplier. This includes prison labour, trafficking, slavery or any kind of work that goes against the will of the worker.

Child labour is never to be used by any branch of TEG, its subsidiaries or any supplier. When employing young people, attention must be paid to the guidelines formulated by the International Labour Organization.

Employees at TEG, all subsidiaries and suppliers shall treat each other and everyone else with respect and not discriminate against anyone based on race, sexual orientation, ethnicity, language, health status, age, nationality, gender, political views or religion.

TEG, all subsidiaries and suppliers shall follow local laws and regulations in regard to wages, pensions, piece rates and other elements of compensation. Furthermore, TEG, all subsidiaries and the suppliers shall provide employment contracts to all employees.

TEG, all subsidiaries and suppliers shall respect lawful collective agreements. Furthermore, TEG, all subsidiaries and suppliers shall respect the employees' right to organize themselves and negotiate collective wage agreements.

Monetary fines or deduction in compensation, as a means of disciplinary measure, can only be carried out if legal and agreed by collective bargaining agreements.

Business integrity and anti-corruption

All employees at TEG and at its subsidiaries as well as all suppliers shall comply with all applicable laws relating to corruption, intellectual property rights and bribery and thereby ensure a high level of integrity.

TEG, each subsidiary and each supplier must ensure, through relevant training, that they do not offer, promise, give or accept bribes or gifts.

TEG, each subsidiary and each supplier must commit to take actions to combat and prevent all forms of corruption at the earliest possible opportunity.

The easy, simple version:

1. Treat all guests, employees and partners with the utmost care, respect and on fair terms according to local laws.
2. Do not litter and throw garbage all around.
3. Treat nature and wildlife with proper respect.
4. Make sure that all guests, employees, and partners are safe and trained in the necessary safety equipment and procedures.