



DAVELOR SHIPS SERVICES

# CODE OF ETHICS

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**Version:** 1.0

**Effective Date:** June 2022

**Approved by:** Management

## 1. Purpose of the Code

At Davelor, we uphold the highest standards of ethics, integrity, and professionalism in all our business activities and relationships. This Code of Ethics, or “The Code,” reflects our core values and guides every decision and action we take.

## 2. Davelor Values

Our values shape how we act, decide, and interact:

### 2.1 Integrity and Transparency

Acting honestly and openly, taking responsibility for our commitments, and fostering trust through clear communication.

### 2.2 Respect for People

Treating every individual with fairness, dignity, and respect. Our culture embraces diversity, values unique contributions, and encourages collaborative teamwork.

### 2.3 Customer Centricity and Boutique Services

Delivering tailored, high-quality services that consistently exceed expectations.

### 2.4 Compliance

Adhering fully to all laws, regulations, industry standards, and internal policies.

### 2.5 Lasting Relationships

Building long-term partnerships with customers, suppliers, and business partners based on respect and shared success.

### 2.6 Continuous Improvement and Innovation

Promoting ongoing learning and embracing change as an opportunity to advance.

## 3. Scope

This Code applies to everyone connected with Davelor—employees, contractors, suppliers, partners, and subagents. It guides all our operations and interactions.

## 4. Accountability

We take responsibility for our actions, understanding their impact on colleagues and stakeholders. Transparency means admitting mistakes and learning from them—building trust and empowering everyone to uphold our values and contribute to the company’s success.

## 5. Diversity and Inclusion

Diversity is a strength. Davelor fosters an inclusive workplace that respects different backgrounds and perspectives. Discrimination, harassment, or bias in any form is not tolerated. We promote equal opportunity and respectful collaboration.

## 6. Social and Environmental Responsibility

We strive to make a positive impact beyond business. Prioritizing sustainability, ethical sourcing, and social responsibility, Davelor works to reduce our environmental footprint and contribute to society. Each of us plays a part in protecting our planet for future generations.

## 7. Reporting Violations

We encourage open and honest communication. If you observe any breaches of this Code or unethical behavior, report it to your supervisor or management. All reports will be treated confidentially, and handled promptly and fairly. We are committed to protecting those who raise concerns in good faith from retaliation.

## 8. Consequences of Violations

Violating this Code may lead to disciplinary actions such as warnings, suspension, or termination of employment or business relationships, depending on the severity of the breach. Davelor may also take legal action and cooperate fully with relevant authorities. Upholding these standards is essential to protecting our integrity and reputation.

## 9. Review and Revision

This Code is a dynamic document that evolves in response to changes in our business environment, industry standards, and legal requirements. We conduct regular reviews to ensure it remains relevant and effective. Everyone associated with Davelor is encouraged to provide feedback, suggestions and insights to help improve the Code. Any updates or revisions will be clearly communicated, along with resources and guidance to help everyone understand and apply the changes.

## 10. Conclusion

Our Code of Ethics is a reflection of who we are and the positive impact we seek. By embracing these values, we commit to integrity, respect, and responsibility in all we do. Thank you for helping make Davelor a trusted and responsible company.

## 11. Compliance Contact

For any questions regarding this Code or to report a concern, please contact:

Email: [compliance@davelor.com](mailto:compliance@davelor.com)