



DAVELOR SHIPS SERVICES

# CODE OF BUSINESS CONDUCT

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**Version:** 1.0

**Effective Date:** June 2022

**Approved by:** Management

## 1. Introduction

Davelor is committed to conducting business with the highest standards of professionalism, integrity, and responsibility. This Code of Business Conduct & Commitments sets out the principles and expectations that guide our behavior and decision-making in daily operations.

## 2. Purpose

This Code establishes the standards of conduct expected from all individuals associated with Davelor to promote integrity, compliance, and ethical behavior. It applies to employees, suppliers, subagents, contractors, partners, clients, and anyone acting on behalf of Davelor.

By adhering to this Code, all members of our extended community contribute to building trust and fostering a positive, ethical, and compliant work environment.

## 3. Core Business Conduct Principles

At Davelor, we commit to these fundamental principles that guide our daily behavior and business decisions:

### 3.1 Integrity and Transparency

Acting honestly and openly in all interactions, maintaining transparency to build trust and accountability.

### 3.2 Respect for People

Treating everyone with fairness, dignity, and respect, fostering an inclusive and collaborative environment.

### 3.3 Compliance

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

### 3.4 Fair Competition and Antitrust

We are committed to conducting business in full compliance with all applicable competition and antitrust laws. Davelor promotes fair, open, and honest competition, avoiding any practices that could unfairly limit competition or harm the market. We expect all employees, partners, and suppliers to respect these laws and to act responsibly to maintain a level playing field.

### 3.5 Conflicts of Interest

We are committed to fairness and transparency by actively avoiding conflicts between personal interests and professional duties. When potential conflicts arise, we disclose them promptly to maintain trust and uphold the integrity that is central to Davelor's values. This proactive approach ensures that all decisions are made objectively and ethically.

### **3.6 Confidentiality and Data Protection**

We recognize that protecting sensitive information is fundamental to respecting the trust placed in us by Davelor, our clients, and partners. Safeguarding confidential and personal data is a key expression of our commitment to integrity and respect. We adhere strictly to all data protection laws and company policies to ensure privacy and security in every aspect of our work.

### **3.7 Responsible Use of Company Resources**

Using Davelor's assets, technology, and resources responsibly reflects our respect for the company and each other. We commit to utilizing all resources efficiently and solely for legitimate business purposes, supporting our shared responsibility to maintain Davelor's reputation and operational excellence.

### **3.8 Continuous Improvement**

Embracing a mindset of learning and innovation to enhance personal and organizational performance.

## **4. Commitment to Customers**

Davelor commits to Boutique Services. We provide tailored solutions designed specifically for each client, ensuring a personalized experience that consistently exceeds expectations.

Davelor commits to Open and Transparent Communication. We maintain honest and timely communication with clients, keeping them informed of any changes or issues while ensuring pricing is clear and fair.

Davelor commits to Compliance. We uphold strict adherence to all applicable laws, regulations, and ethical standards, ensuring that our services are delivered responsibly and reliably.

Davelor commits to Safeguarding Commercial Confidentiality. We protect sensitive business information and trade secrets with the utmost care, recognizing that trust and integrity are foundational to lasting client relationships.

Davelor commits to Continuous Improvement through Client Feedback. We actively seek and value client input, using their insights to refine our services and processes. This ongoing commitment drives us to improve continually and deliver superior client experiences.

## **5. Commitment to Employees**

Davelor commits to a Fair, Equal, and Inclusive Workplace. We foster an environment where every employee is respected and valued, regardless of background, identity, or beliefs. Fairness and equality guide our internal policies to ensure everyone receives equitable treatment without bias or favoritism.

Davelor commits to Training and Professional Development. We invest in continuous learning and skill-building to support employees' growth and success. Comprehensive training, including

onboarding on our Code of Ethics and compliance policies, equips all team members to excel in their roles.

Davelor commits to Health and Safety. We prioritize the well-being of all employees by maintaining high health and safety standards across all work environments. Essential safety equipment and clear procedures ensure everyone can perform their duties confidently and securely.

Davelor commits to Empowerment and Open Communication. We believe every employee's voice matters. Open, two-way communication channels empower our team members to share ideas, concerns, and insights that contribute to our shared success.

Davelor commits to Work-Life Harmony. We support our employees in balancing their professional and personal lives, recognizing that this balance fosters productivity, creativity, and overall satisfaction.

## **6. Commitment to Third Parties**

Davelor commits to Due Diligence. We carefully select partners, suppliers, and contractors who share our standards of quality, integrity, and values, ensuring reliable and ethical collaborations.

Davelor commits to Compliance with Laws and Regulations. We expect all third parties to adhere fully to applicable laws and industry regulations, supporting responsible and lawful business practices.

Davelor commits to Ethical Practices and Anti-Corruption. We uphold zero tolerance for bribery and corruption and require third parties to operate with honesty, fairness, and transparency. Relevant policies, including our Code of Ethics and Anti-Corruption Policy, are available to support this commitment.

Davelor commits to Confidentiality and Data Security. We protect sensitive information shared by third parties and comply with data protection laws, fostering trust and secure cooperation.

Davelor commits to Respect for Human Rights and Labor Practices. We partner with organizations that honor human rights, promote fair labor conditions, and ensure safe workplaces.

Davelor commits to Quality and Performance. We expect third parties to deliver services and products that meet agreed standards of quality, timeliness, and reliability.

Davelor commits to Monitoring and Accountability. We reserve the right to assess third-party compliance and take appropriate actions to uphold our standards and protect our reputation.

Davelor commits to Sustainability. We seek partnerships with organizations that share our dedication to environmental stewardship and social responsibility, working together to make a positive impact.

## 7. Training and Awareness

Davelor is committed to ensuring all employees and relevant partners understand and uphold our ethical standards. We provide regular training and awareness initiatives focused on ethical business conduct, anti-corruption, and compliance with relevant policies and laws. These efforts help embed our values into everyday actions, empowering our people to make the right decisions and contribute to a culture of integrity and responsibility.

## 8. Reporting and Accountability

Davelor commits to Open Communication. We encourage all employees, partners, and stakeholders to report any behavior that violates this Code or our policies. Transparency and honesty are essential to uphold our ethical standards.

Davelor commits to Protecting Whistleblowers. Individuals who raise concerns in good faith will be protected from retaliation. We handle all reports with care, respecting confidentiality and ensuring a fair process for everyone involved.

Davelor commits to Consequences of Violations. Violations of this Code may lead to disciplinary actions, including warnings, suspension, termination, or legal measures, depending on the severity. Upholding these standards protects our integrity and reputation.

## 9. Review and Updates

Davelor is committed to keeping this Code of Business Conduct up to date. We review it regularly to reflect changes in our business environment, industry standards, and legal requirements. Everyone associated with Davelor is encouraged to provide feedback and suggestions to help improve the Code. Any updates or revisions will be clearly communicated, along with guidance to help everyone understand and apply the changes effectively.

## 10. Conclusion

Our Code of Business Conduct reflects who we are and the values we uphold. By embracing these commitments, we ensure that integrity, respect, and responsibility guide everything we do. Together, we maintain Davelor's reputation as a trusted, ethical, and responsible company.

Thank you for your dedication to these principles and for being an essential part of our continued success.

## 11. Compliance Contact

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

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

All communications will be treated confidentially.