



## CODE OF ETHICS

Baltic Control<sup>®</sup> shall strictly act in accordance with these Ethical Principles by ensuring that they are reflected in their own Programme which shall be implemented based on the requirements of the TIC Council Compliance Code.

### 1. Integrity

Baltic Control<sup>®</sup>'s work shall always be carried out in a professional, independent and impartial manner.

Baltic Control<sup>®</sup>'s work shall always be carried out honestly, with no influence tolerated in respect to any deviation from either Baltic Control<sup>®</sup>'s approved methods and procedures or the reporting of accurate results.

Data, test results and other material facts shall be reported by Baltic Control<sup>®</sup> in good faith and will not be improperly changed.

All reports and certificates issued by Baltic Control<sup>®</sup> shall correctly present the actual findings, professional opinions or results obtained.

### 2. Conflicts of interest

Baltic Control<sup>®</sup> shall avoid conflicts of interest with any related entity in which Baltic Control<sup>®</sup> has a financial or commercial interest and to which Baltic Control<sup>®</sup> is required to provide services.

Baltic Control<sup>®</sup> shall avoid conflicts of interest between Baltic Control<sup>®</sup> companies and/or divisions engaged in different activities but which may be providing services to either the same client or each other. Baltic Control<sup>®</sup> shall ensure that our employees avoid conflicts of interest with the activities of Baltic Control<sup>®</sup>.

### 3. Confidentiality and Data Protection

Baltic Control<sup>®</sup> shall respect the confidentiality and privacy of client's information and ensure processes are in place to adequately protect such information.

Baltic Control<sup>®</sup> shall treat all information received in the course of the provision of our services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

### 4. Anti-bribery

Baltic Control<sup>®</sup> shall prohibit:

- offers, gifts or acceptance of bribe in any form, including kickbacks on any portion of a contract payment.
- the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers or employees of any such party or government officials.

### 5. Fair Marketing

Baltic Control<sup>®</sup> shall:

- conduct marketing (including comparisons with, or references to, competitors, competitors' services or third parties) in a manner that is truthful, not deceptive or misleading or likely to mislead, and is consistent with applicable laws.
- present ourselves in a fair manner; and
- ensure presentational information, including descriptions of Baltic Control<sup>®</sup>'s network and affiliations, resources employed and the services provided, is accurate and unambiguous.

### 6. Fair Labour

Baltic Control<sup>®</sup> is aware of our social responsibility for our employees and the people, communities and environments in which we work and shall respect human rights as described in Baltic Control<sup>®</sup>'s Code of Conduct.

Denmark, Aarhus 23rd of March 2020

Karina Engstrøm Nielsen, Chairman of the Board

Martin Engstrøm Pedersen, Managing Director,