Sallaum Lines

CODE OF CONDUCT

Omonoias & Pafou Avenue,
Frantzis Tower, 3051, Limassol,
Cyprus

Chairman's Message

At **Sallaum Lines Switzerland SA**, our reputation is our most valuable asset. It has been built over decades of service through integrity, responsibility, and a relentless commitment to doing what is right — not just what is easy.

The shipping and logistics industry is complex, regulated, and global. Every decision we make has consequences that extend beyond our company — to our clients, our partners, the environment, and the communities we serve. This is why we hold ourselves to the highest ethical and professional standards, as reflected in this **Code of Conduct.**

This Code is more than a set of rules. It is a guide for how we work, how we treat one another, how we manage risks, and how we build trust with governments, regulators, and stakeholders worldwide. It empowers every employee and Business Associate to act responsibly, speak up when something is wrong, and always place integrity at the heart of our business.

Our achievements — including our **ISO 9001:2015 certification**, strong **DUNS Supplier Assurance rating of 91 %**, and **Ecovadis Bronze Medal** in sustainability — reflect our ongoing progress. But these are only milestones. Our long-term success depends on each of us applying the values of this Code consistently, whether at sea, in port, or in the office.

I ask you to read this Code carefully, reflect on its principles, and make them part of your daily decisions. Together, we can ensure that Sallaum Lines remains a **trusted, respected, and responsible leader in global shipping and logistics.**

Sami Sallaum
Chairman
Sallaum Lines

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I. Introduction

I.I. Purpose of the Code

At Sallaum Lines, integrity, responsibility, and excellence form the foundation of everything we do. This Code of Conduct serves as a compass to guide our decisions, behaviors, and business practices across all levels of the organization. It provides a clear framework for ethical and professional conduct, ensuring that our people, partners, and stakeholders operate consistently with our values and our commitments.
In the fast-moving and highly regulated shipping and logistics industry, the Code is not only a set of rules but also a strategic tool. It safeguards our reputation, enhances our operational resilience, and ensures compliance with international laws, maritime conventions, and evolving sustainability standards.
By adopting this Code, we affirm our role as a **trusted carrier**, a **responsible corporate citizen**, and a **reliable partner** in global trade.

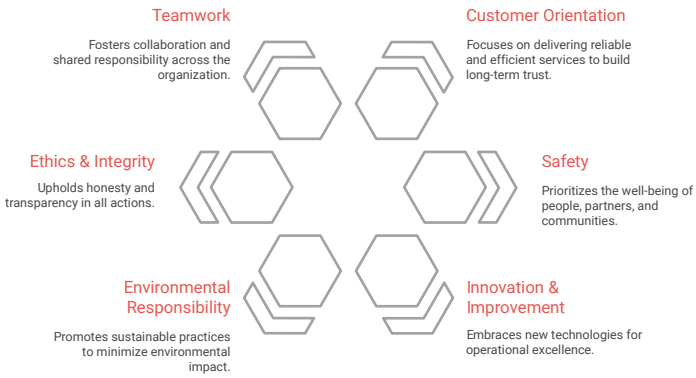
I.II. Scope and Applicability

This Code applies to:

•All employees of Sallaum Lines, regardless of role, location, or employment status.
•The Board of Directors, senior management, and all subsidiaries or affiliates.
•Contractors, consultants, suppliers, service providers, and business partners acting on behalf of, or in collaboration with, Sallaum Lines.

It is our expectation that every individual and organization connected to Sallaum Lines upholds the same high standards of conduct. Non-compliance with this Code is not tolerated, as it compromises not only our values but also our customers' and communities' trust.
This Code operates in parallel with national and international laws, maritime regulations, and our internal policies. Where the Code sets higher expectations than local law or business practice, our Code prevails.

I.III. Core Values and Guiding Principles



Sallaum Lines has built its reputation on a culture of service, compliance, and sustainability. Our guiding principles reflect who we are and how we work:
1.**Customer Orientation** – We place customers at the heart of our business, delivering reliable and efficient services that create value and long-term trust.
2.**Safety** – We prioritize the safety and well-being of our people, our partners, our cargo, and the communities we serve.
3.**Innovation & Continuous Improvement** – We embrace new technologies and methods, striving for operational excellence and long-term competitiveness.
4.**Environmental Responsibility**– We minimize environmental impact, promote sustainable shipping practices, and contribute to the global transition to greener logistics.
5.**Ethics & Integrity** – We act with honesty, fairness, and transparency, upholding the highest standards of compliance and corporate governance.
6.**Teamwork** – We succeed through collaboration, respect, and a culture of shared responsibility across borders and functions.

I.IV. Our Certifications and Recognitions

ISO 9001:2015

Recognition of a robust Quality Management System, ensuring consistent customer and regulatory requirements are met while pursuing continuous improvement.

DUNS Supplier Assurance

A testament to transparency, reliability, and financial and ethical credibility in global supply chains.

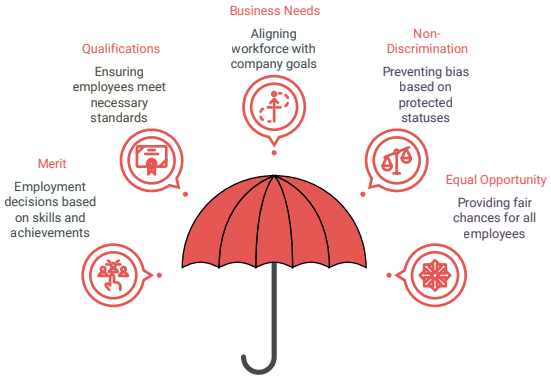
EcoVadis Bronze Medal

International recognition of sustainability performance across environment, labor and human rights, ethics, and sustainable procurement.

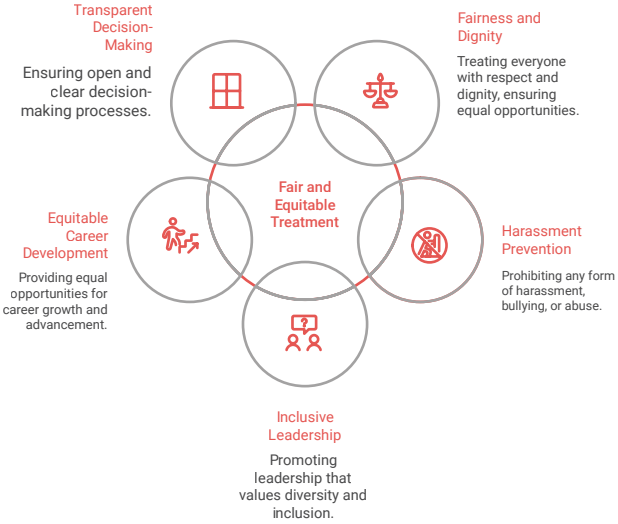
These achievements are not static honors; they are living commitments. They hold us accountable to our stakeholders and challenge us to keep raising the bar for corporate governance, compliance, and sustainability within the maritime and logistics sectors.

II. Commitment to Ethical Conduct in the Workplace

II.I. Non-Discrimination and Equal Opportunity



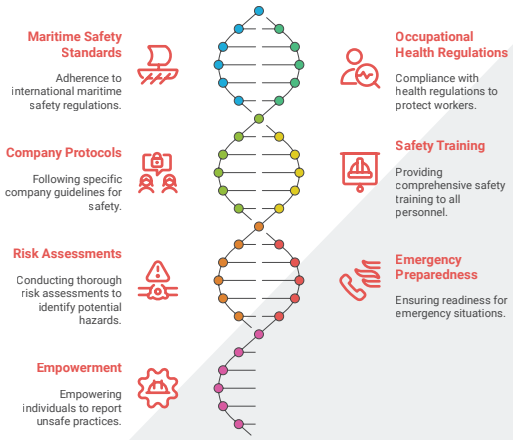
II.II. Fair and Equitable Treatment



We treat all employees, contractors, and partners with fairness, dignity, and respect. Harassment, bullying, intimidation, or abuse of any form is strictly prohibited. Our commitment extends to promoting inclusive leadership, equitable career development, and transparent decision-making processes across all levels of the organization.

Reference: Workplace Harassment Policy; Grievance Handling Procedure

II.III. Safe, Secure, and Healthy Working Conditions



The safety of our people and partners is a non-negotiable priority. We adhere to international maritime safety standards, occupational health regulations, and company-specific protocols to ensure secure working conditions onshore and at sea. Safety training, risk assessments, and emergency preparedness are integral to our operations. Every individual is empowered to stop unsafe practices and report hazards without fear of retaliation.

Reference: Health & Safety Policy, Environment Policy; Shipboard Safety ManagementSystem (SMS); Emergency Response Plan

II.IV. Mental Health and Well-Being

Mental Health Awareness
Promoting understanding and recognition of mental health issues

Supportive Resources
Providing access to tools and services for mental health support

Work-Life Balance
Encouraging a healthy equilibrium between work and personal life

Stress Reduction
Implementing strategies to minimize workplace stress

Resilience Building
Fostering the ability to recover from challenges

We recognize that employee well-being goes beyond physical safety. Sallaum Lines promotes mental health awareness, provides access to supportive resources, and encourages work-life balance. We acknowledge the challenges of maritime and logistics environments and are committed to reducing stress factors and fostering resilience through employee support programs.
Reference: Occupational Health Policy

II.V. Remote Work and Flexible Work Policies

Enhanced Productivity
Remote work and flexible schedules can lead to increased output.

Reduced Stress
Flexibility can help employees manage stress and improve well-being.

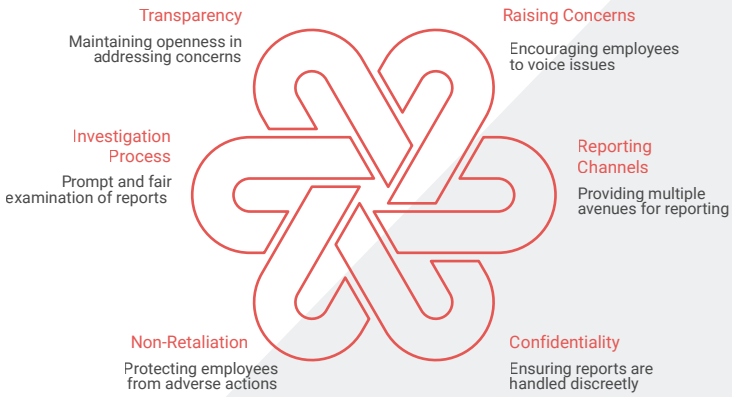
Accommodate Circumstances
Policies support employees' personal needs while maintaining business goals.

In line with evolving workplace practices, Sallaum Lines supports flexibility where operationally feasible. Remote work arrangements and flexible schedules are offered to enhance productivity, reduce stress, and accommodate personal circumstances while maintaining business continuity and accountability.
Reference: Remote Work and Flexible Work Policy; Data Protection Guidelines

II.VI. Accountability and Responsibility

Every employee and manager is responsible for upholding the Code of Conduct. Accountability means owning decisions and actions, fulfilling commitments, and reporting misconduct promptly. Leaders have an added duty to model ethical behavior, ensure compliance, and cultivate a culture of integrity.
Reference: Accountability & Responsibility Policy

II.VII. Open Communication and Speak-Up Culture



We encourage employees to raise concerns, ask questions, and report suspected violations without fear of retaliation. Multiple confidential channels are available for reporting, including direct supervisors, HR, compliance officers, and whistleblowing platforms. All reports are taken seriously, investigated promptly, and addressed with fairness and transparency.
Reference:Whistleblowing Policy; Open-Door Communication Policy; Non-Retaliation Policy

II.VIII. Human and Labor Rights (Anti-Slavery, Anti-Human Trafficking)

International Labor Standards
Adherence to global labor norms

Forced Labor
Prohibition of involuntary work

Child Labor
Prevention of underage employment

Human Trafficking
Combating illegal human trade

Modern Slavery
Elimination of contemporary slavery forms

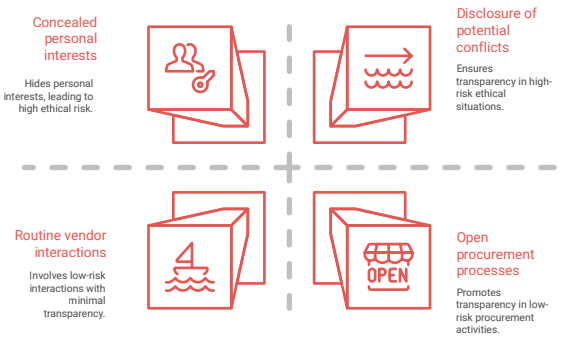
ILO Conventions
Compliance with ILO agreements

UN Global Compact
Alignment with UN principles

National Laws
Adherence to local legal frameworks

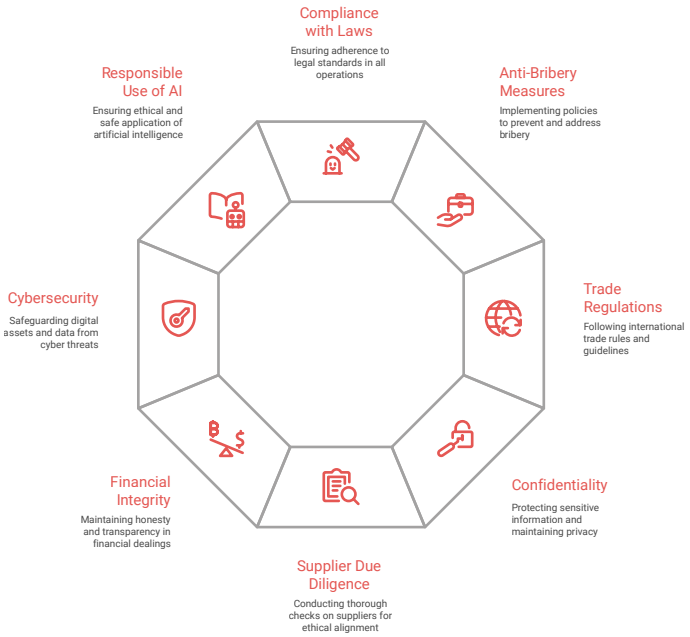
Sallaum Lines upholds international labor standards and condemns all forms of forced labor, child labor, human trafficking, and modern slavery. We require our employees, suppliers, and partners to respect these rights and operate in accordance with International Labour Organization (ILO) conventions, the UN Global Compact, and applicable national laws. Any violation of these principles is grounds for immediate corrective action, including termination of contracts.
Reference: Human and Labor Rights Policy; Supplier Code of Conduct; Anti-Slavery and Human Trafficking Policy

II.IX. Conflict of Interest Management



Employees and business partners must avoid situations where personal interests conflict, or appear to conflict, with the interests of Sallaum Lines. Conflicts may arise in areas such as procurement, vendor relationships, gifts and hospitality, or outside business engagements. All potential conflicts must be disclosed to management or compliance for review and resolution. Transparency is the first step toward trust and ethical decision-making.
Reference: Conflict of Interest Policy; Gifts and Hospitality Policy; Procurement Policy

Commitment to Ethical Business Practices



Ethical behavior is the foundation of Sallaum Lines' operations. This section provides guidance on compliance with laws, anti-bribery measures, trade regulations, confidentiality, supplier due diligence, financial integrity, cybersecurity, and the responsible use of emerging technologies like AI. It ensures that our business practices remain transparent, lawful, and trustworthy.

III.I. Compliance with Laws and Regulations

Local Laws
Adherence to laws within the immediate community.

Regional Laws
Compliance with laws at the state or province level.

International Laws
Adherence to laws governing global interactions.

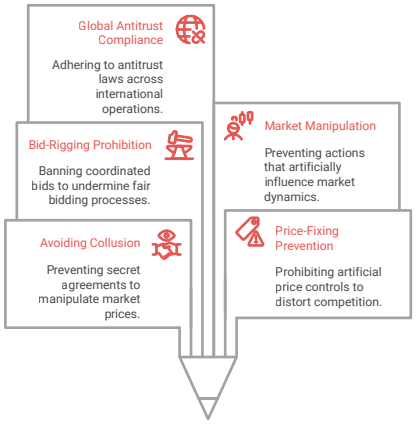
Employee Responsibility
Employees' duty to stay informed and act lawfully.

We operate in strict adherence to all applicable local, regional, and international laws. Compliance is a baseline, not a ceiling, and employees are expected to stay informed and act lawfully in every jurisdiction where we conduct business.
Reference: Compliance Policy

III.II. International Trade and Sanctions Compliance

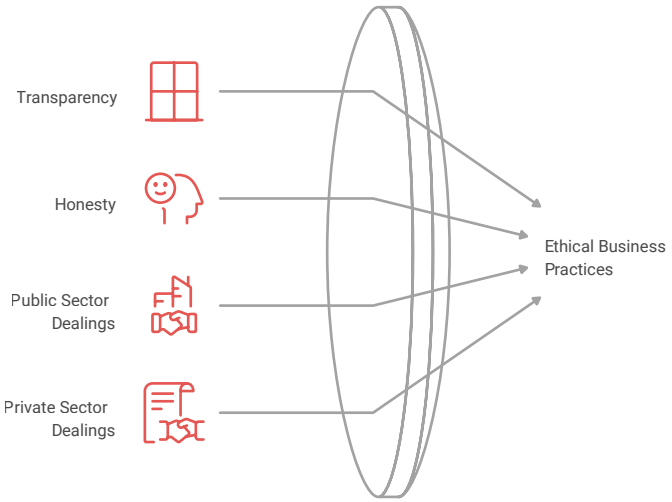
As a global shipping and logistics provider, we strictly comply with international sanctions, export control regulations, and trade restrictions issued by bodies such as the United Nations, European Union, OFAC (U.S.), and relevant national authorities. Violations of trade laws can result in severe penalties and reputational damage.
Reference: International Sanctions and Export Control Policy; Know Your Customer (KYC) and Business Partner Policy

III.III. Fair Competition and Anti-Trust



We compete fairly, avoiding collusion, price-fixing, bid-rigging, or market manipulation. Antitrust compliance applies globally, including shipping alliances and logistics partnerships. Any conduct that restricts free and fair competition is prohibited.
Reference: Fair Competition and Antitrust Policy; Procurement Policy

III.IV. Anti-Bribery and Corruption



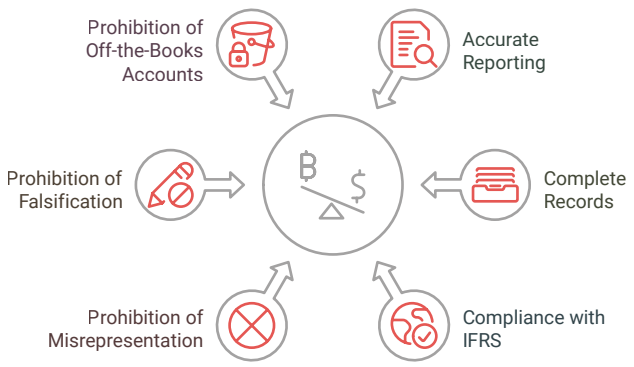
We maintain zero tolerance for bribery, corruption, facilitation payments, or improper advantages in any form. This applies to dealings with both public and private sector counterparts. Employees and business partners must act transparently and honestly at all times.
Reference: Anti-Bribery and Corruption Policy

III.V. Gifts, Hospitality, and Entertainment

Should I offer or accept gifts, hospitality, or entertainment?

Offering or accepting gifts, hospitality, or entertainment must not influence — or appear to influence — business decisions. All exchanges must be reasonable, proportionate, and properly recorded. Lavish or inappropriate offers are prohibited.
Reference: Gifts, Hospitality, and Entertainment Policy; Conflict of Interest Policy

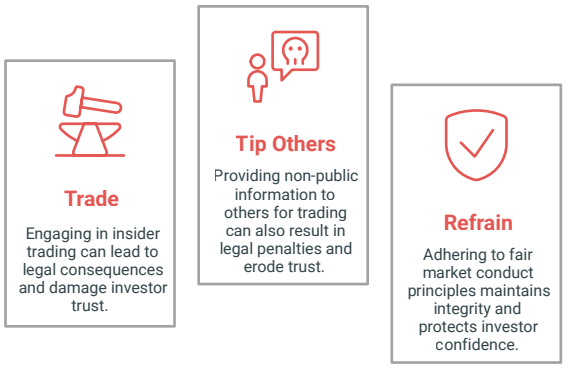
III.VI. Financial Records and Accounting Integrity



Financial reporting must be accurate, complete, and in compliance with International Financial Reporting Standards (IFRS). Misrepresentation, falsification, or off-the-books accounts are strictly forbidden.
Reference: Financial Integrity and Reporting Policy; Recordkeeping and Documentation Policy

III.VII. Insider Trading and Market Abuse Prevention

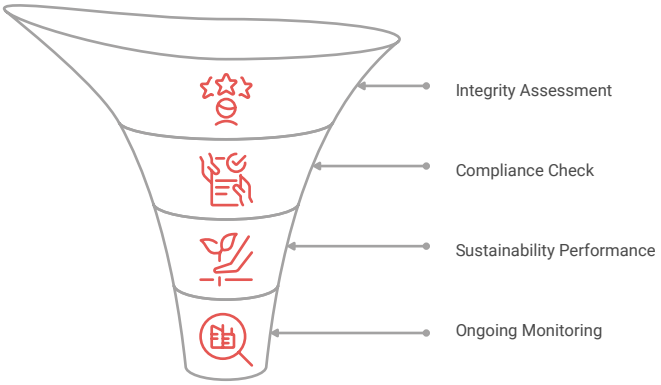
Should I trade or tip others to trade based on non- public information?



Employees with access to material, non-public information must not trade or tip others to trade in securities. We uphold fair market conduct principles to protect investor trust.
Reference: Market Conduct Policy; Compliance Policy

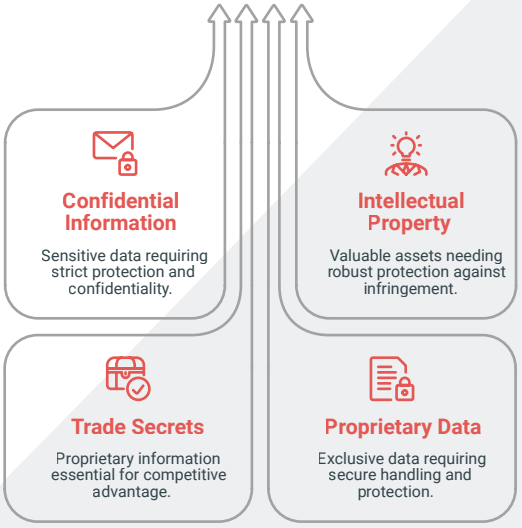
III.VIII. Third-Party and Supplier Due Diligence

Supplier Due Diligence Process



Before engaging with suppliers, agents, or contractors, Sallaum Lines conducts rigorous due diligence to assess integrity, compliance, and sustainability performance. Ongoing monitoring ensures adherence to contractual and ethical standards.
Reference: Third-Party Due Diligence Policy; Supplier Code of Conduct

III.IX. Confidential Information and Intellectual Property

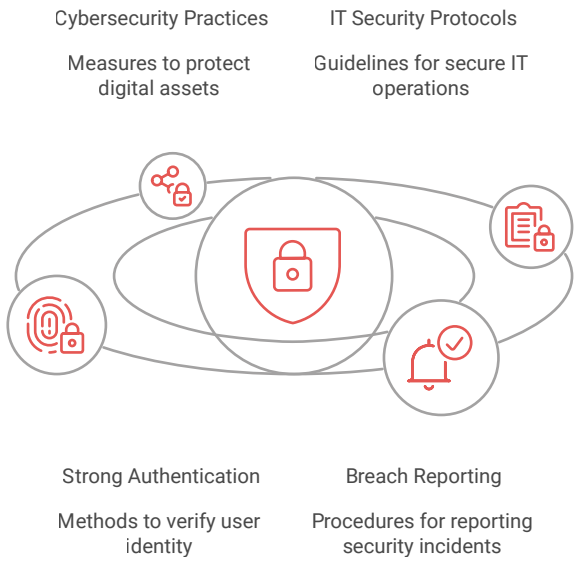


Confidential information must be safeguarded against unauthorized use, sharing, or disclosure. Intellectual property, trade secrets, and proprietary data are critical assets that require strict protection.
Reference: Confidentiality and Non-Disclosure Policy; Intellectual Property Protection Policy

III.X. Data Privacy and Protection (GDPR and Global Standards)

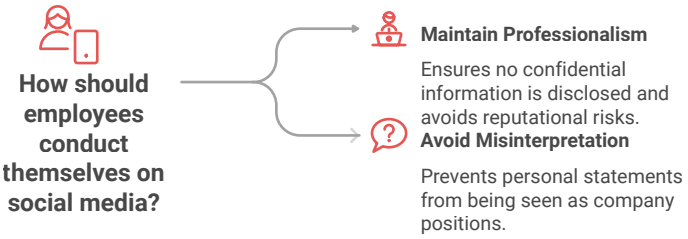
We comply with the EU General Data Protection Regulation (GDPR) and other global privacy frameworks. Personal data of employees, customers, and partners must be collected, processed, and stored lawfully and securely.
Reference: Data Privacy and Protection Policy; GDPR Compliance Guidelines

III.XI. Cybersecurity and Digital Responsibility



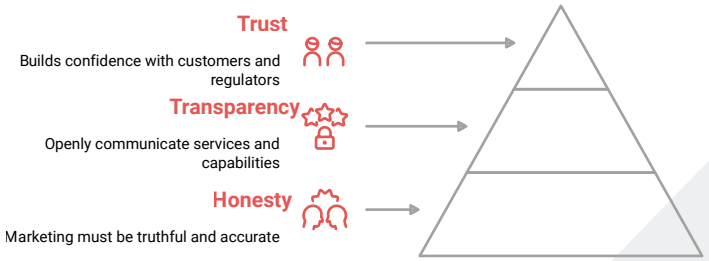
Strong cybersecurity practices protect our digital infrastructure, systems, and customer data. Employees are required to follow IT security protocols, use strong authentication measures, and report potential breaches immediately.
Reference: Cybersecurity Policy; IT Acceptable Use Policy

III.XII. Social Media Conduct



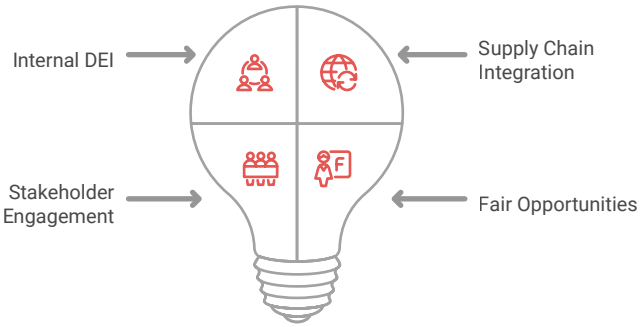
Employees must exercise professionalism when using social media, avoiding any disclosure of confidential information, reputational risks, or statements that could be misinterpreted as company positions.
Reference: Social Media and Public Communications Policy

III.XIII. Ethical Marketing and Advertising



All marketing and advertising must be honest, accurate, and free of misleading claims. Transparency in communicating services, capabilities, and sustainability efforts builds trust with customers and regulators.
Reference: Marketing and Advertising Ethics Policy; Transparency and Disclosure Guidelines

III.XIV. Diversity, Equity, and Inclusion Initiatives



Beyond internal DEI, we integrate inclusivity principles into our supply chain and stakeholder engagements, ensuring fair opportunities in employment, partnerships, and procurement.
Reference: Diversity, Equity, and Inclusion (DEI) Policy Supplier Code Of Conduct

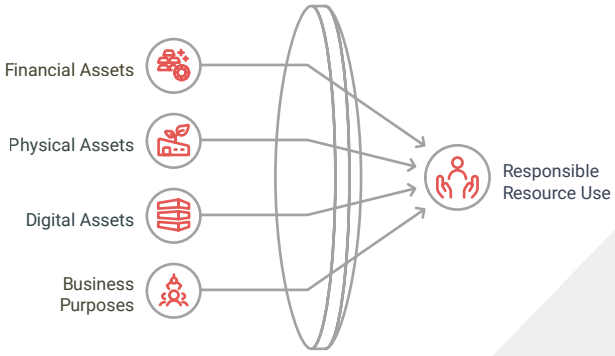
III.XV. Vendor and Supplier Code of Conduct

We expect suppliers to align with our ethical, environmental, and social standards. Supplier contracts embed our Code of Conduct obligations, and compliance is monitored through audits and performance reviews.
Reference: Supplier Code of Conduct; Procurement Policy

III.XVI. Product and Service Quality, Safety, and Reliability

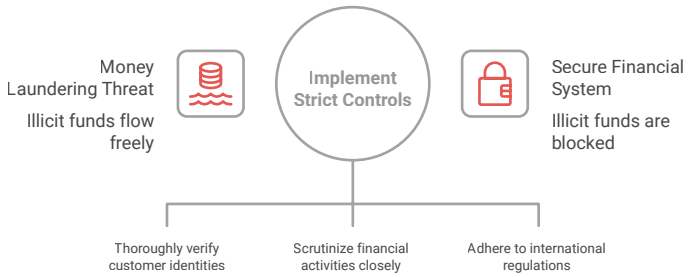
Sallaum Lines commits to providing safe, reliable, and high-quality shipping and logistics solutions. We apply robust quality assurance processes and continuous monitoring to safeguard customers and end-users.
Reference: Quality Assurance and Product Safety Policy; ISO 9001:2015 Quality Management System

III.XVII. Responsible Use of Company Assets and Resources



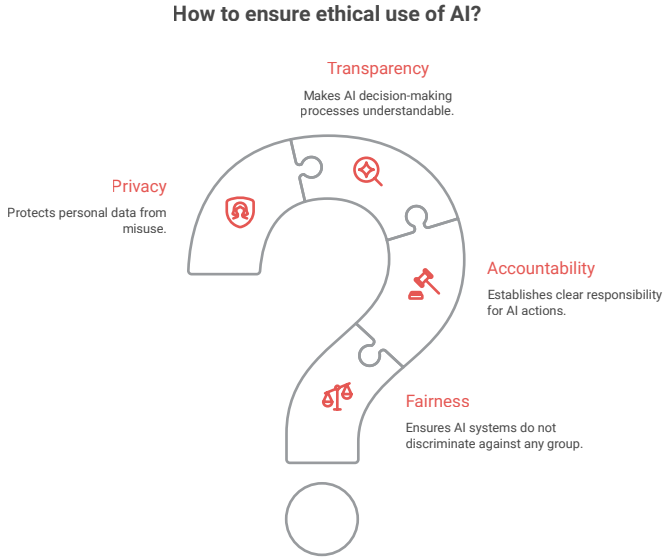
Company assets, including financial, physical, and digital resources, must be used responsibly, efficiently, and solely for legitimate business purposes. Misuse, waste, or personal exploitation of resources is prohibited.
Reference: Asset Management Policy; Company Property and Resources Policy

III.XVIII. Anti-Money Laundering and Counter-Terrorist Financing



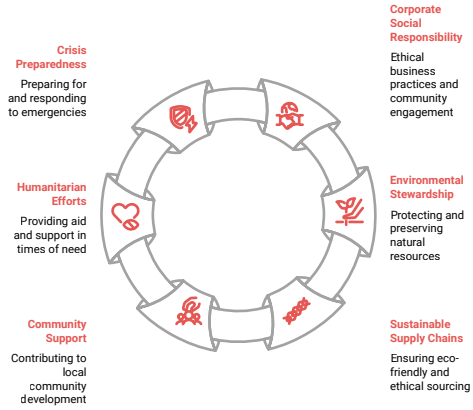
We apply strict controls to prevent money laundering and terrorist financing, including enhanced due diligence, monitoring of transactions, and compliance with global AML/CFT regulations.
Reference: Anti-Money Laundering (AML) Policy, Counter-Terrorist Financing Policy; Customer Due Diligence (CDD) Procedure

III.XIX. Ethical Use of Artificial Intelligence (AI)



AI solutions must be developed and deployed with fairness, accountability, transparency, and respect for privacy. Ethical considerations must be integrated into risk assessments and governance structures before adoption.
Reference: AI Ethics and Governance Policy; Data Ethics Policy

IV. Commitment to Social Responsibility and Sustainability

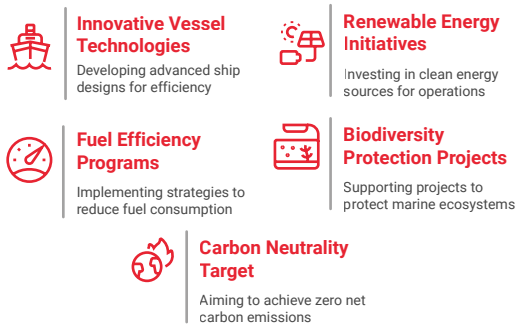


Sallaum Lines recognizes that long-term success depends on positive social and environmental impact. This section focuses on corporate social responsibility, environmental stewardship, sustainable supply chains, community support, humanitarian efforts, and crisis preparedness. It reflects our role as a responsible corporate citizen in the global shipping and logistics industry.

IV.I. Corporate Social Responsibility (CSR)

We embed corporate social responsibility into our business strategy, ensuring our operations deliver long-term value to society, the environment, and our stakeholders. As a signatory to the UN Global Compact, we align with its Ten Principles on human rights, labor, environment, and anti-corruption. CSR is not an isolated initiative but a continuous process of responsible governance and stakeholder engagement.
Reference: CSR and Sustainability Policy; UN Global Compact Commitment Statement

IV.II. Environmental Stewardship and Sustainability-Oriented Innovation



Sallaum Lines recognizes the shipping industry's environmental impact and commits to reducing greenhouse gas emissions, pollution, and resource waste. We pursue innovative vessel technologies, fuel efficiency programs, renewable energy initiatives, and biodiversity protection projects. Our target is to advance toward carbon neutrality in line with IMO decarbonization objectives and the UN SDGs.
Reference:Environmental Policy; ISO 14001 Environmental Management System; Energy Efficiency and Emissions Policy

IV.III. Sustainable Supply Chain and Supplier Engagement

We build a resilient and ethical supply chain by engaging suppliers who share our commitment to sustainability, integrity, and compliance. Regular due diligence, audits, and capacity-building programs ensure suppliers adopt responsible labor practices, reduce environmental impact, and respect human rights.
Reference:Supplier Code of Conduct; Procurement Policy; Third-Party Due Diligence Procedure

IV.IV. Supporting Local Communities

Sallaum Lines invests in the prosperity of communities where we operate through educational, economic, and cultural initiatives. We encourage employee volunteerism, collaborate with local NGOs, and ensure community stakeholders are actively involved in shaping development programs.
Reference: Community Engagement and Development Policy; Volunteering and Social Impact Program

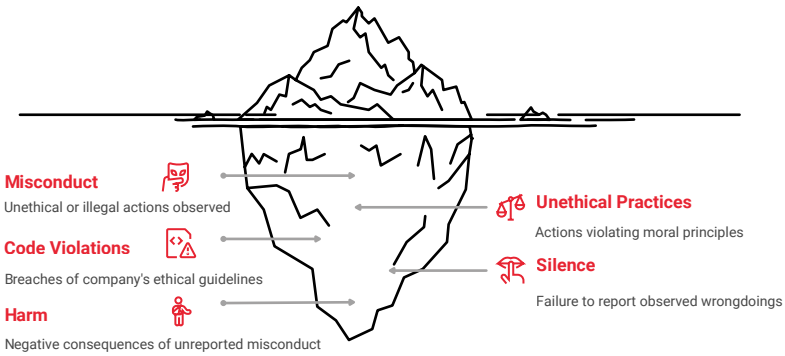
IV.V. Humanitarian Efforts and Philanthropy (Sallaum Humanity Foundation)

Through the Sallaum Humanity Foundation, established in 2018, we provide humanitarian aid, disaster relief, educational scholarships, and healthcare support to vulnerable populations worldwide. This initiative reflects our long-term commitment to social solidarity and giving back to society.
Reference: Sallaum Humanity Foundation Charter

IV.VI. Crisis Preparedness, Management, and Response

We maintain robust crisis management frameworks to protect employees, assets, and communities during natural disasters, economic disruptions, or geopolitical instability. Business continuity plans, emergency response systems, and cross-functional crisis teams ensure rapid, coordinated, and responsible responses.
Reference: Crisis Management and Business Continuity Policy; Emergency Response Plan; Risk Management Framework

V.I. Speak Up – Our Responsibility to Report Concerns



Every employee and business partner has the responsibility to speak up if they witness misconduct, unethical practices, or violations of this Code. Silence can cause harm to individuals, the company, and society. Reporting concerns safeguards our culture of integrity and accountability.
Reference: Whistleblowing Policy; Ethics & Compliance Policy

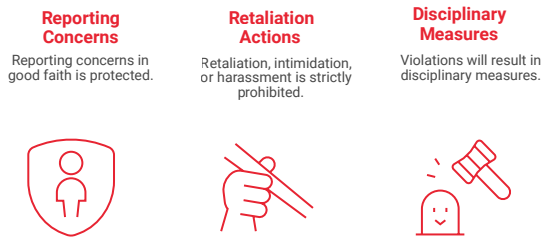
V. Upholding the Code of Conduct

This section explains how employees and business associates should report concerns, seek guidance, and respond to non-compliance. It emphasizes a no-retaliation culture, corrective actions, transparency, and empowerment, ensuring that the Code is actively embedded in everyday decision-making.

V.II. How to Raise Concerns (Grievance, Whistleblowing, Anonymous Channels)

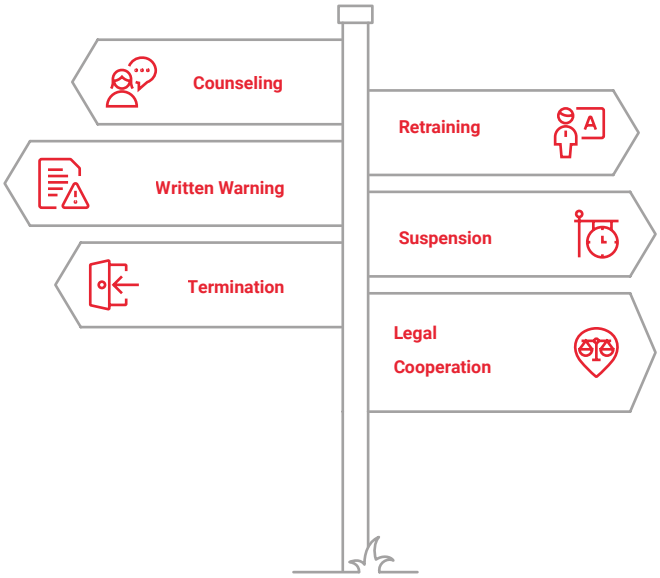
We provide multiple secure channels for reporting concerns, including direct reporting to line managers, compliance officers, dedicated grievance committees, and anonymous hotlines. Employees and third parties may choose the channel most comfortable for them, ensuring accessibility across all regions of operation.
Reference:Whistleblowing Policy; Reporting Procedures Manual

V.III. No Retaliation Commitment



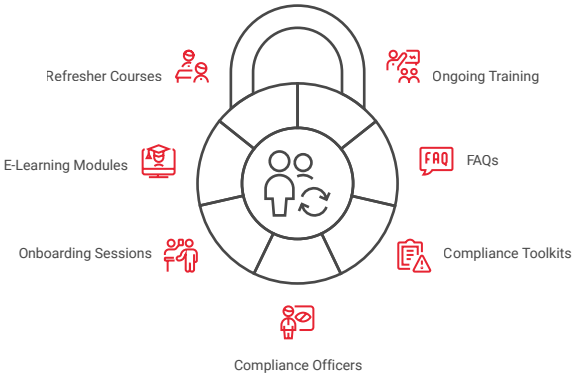
We strictly prohibit retaliation against anyone who reports concerns in good faith. Retaliation, intimidation, or harassment of whistleblowers or complainants is considered a serious violation and will result in disciplinary measures.
Reference: Anti-Retaliation Policy; Employee Rights and Protection Framework

V.IV. Corrective and Disciplinary Actions for Non-Compliance



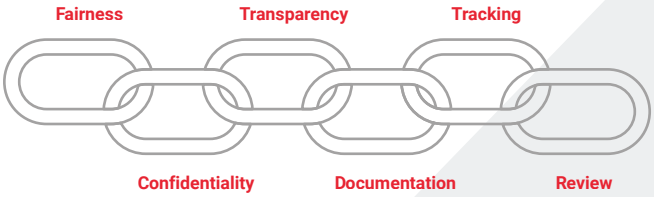
Violations of the Code will be addressed promptly and fairly. Depending on the severity, actions may include counseling, retraining, written warnings, suspension, termination of employment, or termination of business partnerships. In cases involving legal breaches, we will cooperate with authorities.
Reference: Disciplinary Action and Corrective Measures Policy; Compliance Enforcement Procedures

V.V. Resources and Guidance for Employees and Business Associates



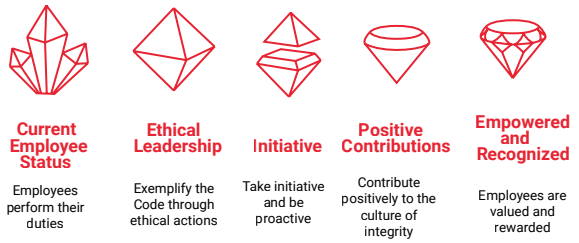
Employees and stakeholders will be supported with ongoing training, FAQs, compliance toolkits, and access to compliance officers for guidance. The Code is reinforced through onboarding sessions, e-learning modules, and refresher courses.
Reference: Training and Development Policy; Ethics & Compliance Resource Portal; Employee Handbook

V.VI. Transparency and Accountability in Enforcement



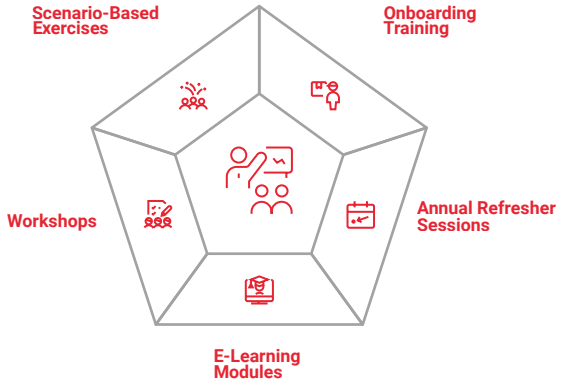
All investigations and enforcement processes will be conducted with fairness, confidentiality, and transparency. Findings and outcomes will be documented, tracked, and reviewed periodically by senior leadership and the Audit & Compliance Committee.
Reference: Investigation and Enforcement Protocol; Audit & Compliance Committee Charter; Transparency Reporting Framework

V.VII. Employee Empowerment and Recognition



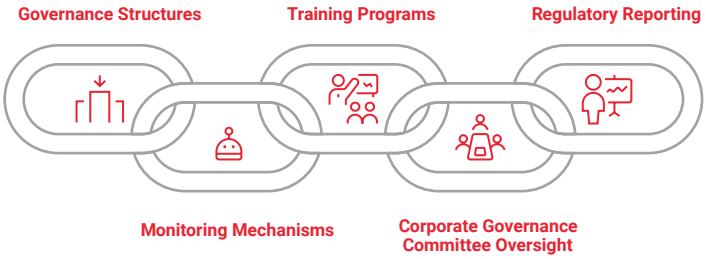
We recognize and reward employees who exemplify the Code through ethical leadership, initiative, and positive contributions to our culture of integrity. Acknowledgment may include internal recognition programs, performance evaluations, and professional development opportunities.
Reference:Employee Recognition and Reward Policy; Performance Management Framework

VI.I. Training and Awareness Programs



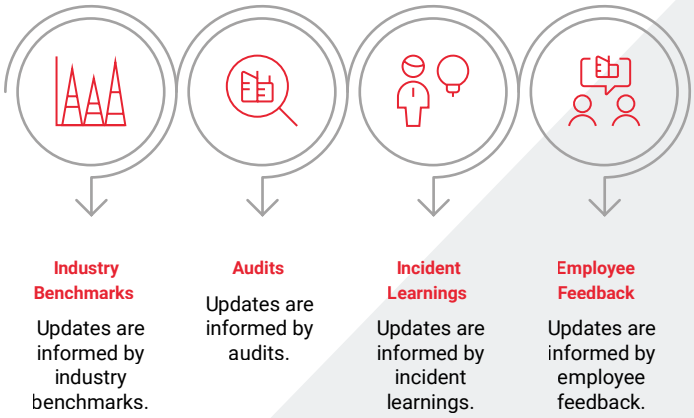
We ensure that all employees, managers, and relevant business associates are fully trained on the Code of Conduct, legal requirements, and ethical expectations. Training occurs upon onboarding and via annual refresher sessions. Programs include e-learning modules, workshops, and scenario-based exercises.
Reference: Training and Development Policy; Ethics & Compliance Learning Program

VI. Governance, Monitoring, and Enforcement



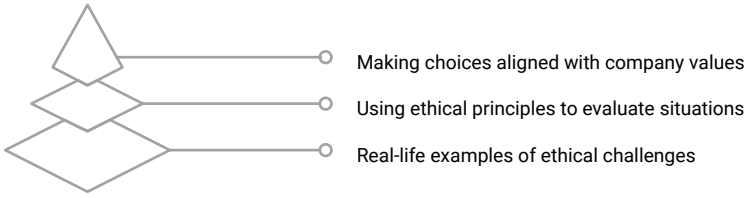
To maintain trust and accountability, Sallaum Lines has established governance structures and monitoring mechanisms. This section describes training, regular reviews, case studies, oversight by the Corporate Governance Committee, audits, and reporting to regulators to ensure the Code is effectively enforced

VI.II. Regular Reviews and Continuous Improvement



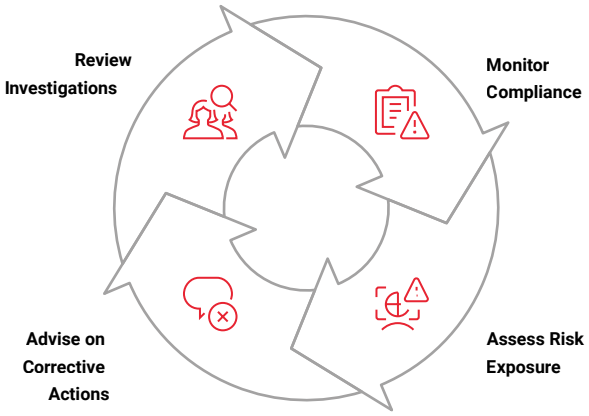
The Code and related policies are reviewed regularly to remain relevant with evolving regulatory, ethical, and operational standards. Updates are informed by industry benchmarks, audits, incident learnings, and employee feedback. Continuous improvement ensures ongoing alignment with ISO 9001:2015, EcoVadis standards, and other international compliance frameworks.
Reference:Compliance Review and Continuous Improvement Policy; Quality Management System Manual (ISO 9001:2015)

VI.III. Case Studies and Practical Scenarios



We provide real-life examples and case studies during training and awareness initiatives to illustrate proper application of the Code in daily operations. These practical scenarios help employees recognize ethical dilemmas, apply judgment, and make informed decisions in alignment with Sallaum Lines' values.
Reference: Training Case Study Toolkit; Scenario-Based Learning Modules

VI.IV. Corporate Governance Committee Oversight

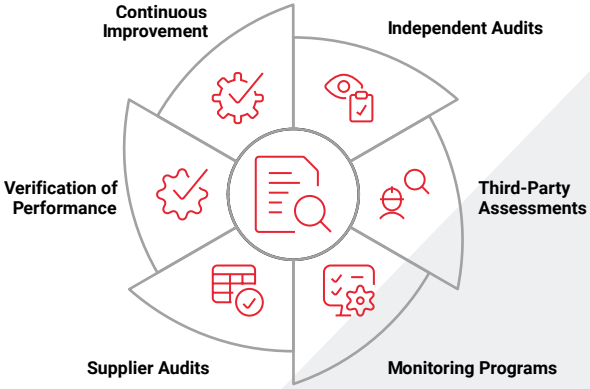


The Corporate Governance Committee ensures effective oversight of the Code's implementation. Responsibilities include monitoring compliance, assessing risk exposure, advising on corrective actions, and reviewing investigations. The Committee maintains independence from operational management to provide objective guidance.
Reference: Corporate Governance Committee Charter; Ethics & Compliance Oversight Policy

VI.V. Reporting to Regulators and External Bodies

We comply with all applicable legal and regulatory reporting obligations. Material breaches, incidents of non-compliance, or any activity that may impact public trust are reported to regulators, certification bodies, or other relevant external authorities as required.
Reference: Regulatory Reporting Policy; Legal & Compliance Escalation Guidelines

VI.VI. Independent Monitoring and Audits

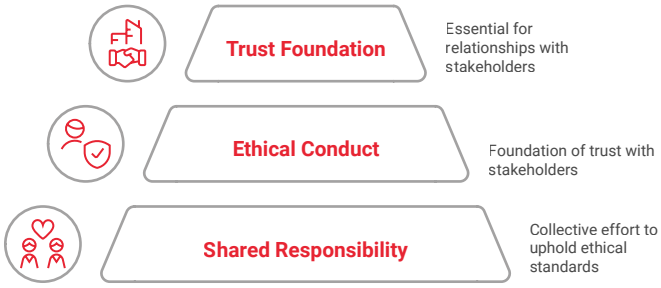


Independent audits and third-party assessments are conducted to evaluate adherence to the Code, policies, and regulatory requirements. Monitoring programs include periodic reviews of internal processes, supplier audits, and verification of ethical, social, and environmental performance. Findings inform continuous improvement measures.
Reference: Internal Audit Policy; Supplier Audit and Monitoring Procedures; ISO 9001:2015 Audit Protocols

VII. Conclusion

The final section reinforces that **ethical conduct is a shared responsibility.** It highlights the collective commitment to integrity, long-term excellence, and alignment with Sallaum Lines' values, ensuring that our culture of ethics and sustainability is consistently upheld across all operations.

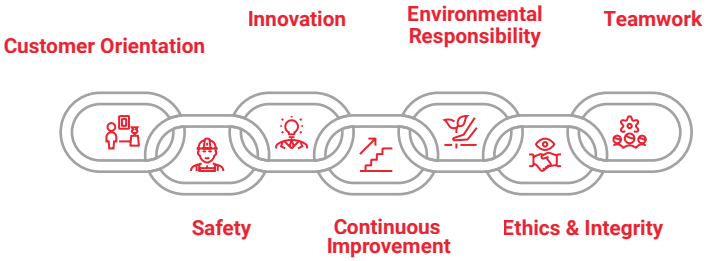
VII.I. A Shared Responsibility for Integrity



Upholding the principles outlined in this Code is a shared responsibility. Every employee, manager, and business associate contributes to fostering a culture of integrity, accountability, and ethical decision-making. Ethical conduct is not optional; it is the foundation of trust with customers, partners, regulators, and the communities we serve.

Reference: Code of Conduct Policy; Ethics & Compliance Responsibility Guidelines

VII.II. Commitment to Long-Term Excellence



Sallaum Lines is dedicated to achieving **long-term sustainable success** while adhering to our values of customer orientation, safety, innovation, continuous improvement, environmental responsibility, ethics & integrity, and teamwork. Our commitment to ethical business practices, social responsibility, and governance excellence ensures that our company remains a trusted leader in the shipping and logistics industry. By embracing this Code, all stakeholders contribute to building a resilient, responsible, and high-performing organization.
Reference:Corporate Strategy and Sustainability Policy; Quality Management System Manual (ISO 9001:2015)

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