

Code of Conduct for collaborative partners

Copenhagen Malmö Port

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Code of Conduct for Collaborative Partners

This Code of Conduct encompasses all of Copenhagen Malmö Port's (CMP's) collaborative partners, including vendors. CMP has endorsed and committed itself to the principles of the UN Global Compact and supports the UN Sustainable Development Goals. We call on our collaborative partners to comply with these principles and to launch initiatives that further UN's Sustainable Development Goals.

The requirements and expectations below are described in no particular order, and each and every one is equally important to CMP. It is our expectation that the Code of Conduct will be complied with by CMP's collaborative partners (including their parent company/subsidiaries) as well any subcontracted vendors they might utilise. It is a basic prerequisite that all local and international law and regulations are respected and that our collaborative partners work proactively to ensure this. It is our expectation that any irregularities in relation to the legal requirements or the requirements of this Code of Conduct will be immediately communicated to CMP and, if applicable, to the relevant public authorities and agencies. CMP's Policy governing our operations dictates that we will work with vendors, contractors and customers for a sustainable development, and we expect our collaborative partners to actively participate in these cooperative efforts.

CMP may impose additional specific requirements in individual contracts for matters relating to environmental protection, safety, and fair working conditions.

Environmental Considerations

Environmental management

CMP requires that our collaborative partners work conscientiously to manage and control their environmental impacts and to stay up-to-date with the environmental legislation which they are subject to. We encourage our collaborative partners to take advantage of recognised environmental management systems, such as ISO 14001. If the collaborative partner is not certified according to ISO 14001 or something similar, it must be possible to show in another way that systematic work is being done on environmental improvements based on the company's environmental policy.

Risk assessment before work is commenced

As it concerns construction tasks and similar activities, it is a requirement that a risk assessment of the planned work has been conducted before the commencement of the work. This also applies to the activities of customers and subcontractors/subcontracted vendors, which may result in negative environmental impact. The risk assessment and the planned control measures, including the description of preparedness, are to be approved by CMP via the designated administrator for the contract. If circumstances change and the risk profile changes, CMP is to be informed and a revised risk assessment will need to be approved. A vendor/contractor who comes across proposals or changes that might reduce the environmental impact is obligated to take the initiative to present the idea to CMP.

Waste and wastewater

CMP expects its collaborative partners to optimise the utilisation of resources and to minimise volumes of waste. Waste and wastewater must be managed and disposed of by the vendor in accordance with the regulations of the competent public authority and within CMP's areas of operation, also according to our specific instructions for sorting and storage. Wastewater may not be fed into our reception facilities without prior agreement.

Chemical substances and materials

When using chemical substances and materials, these must be properly dealt with and stored, and both environmental regulations and the work environment health and safety regulations must be complied with. We strongly encourage the use of environmentally certified products to the furthest extent possible. Material safety data sheets must be able to be presented upon request and must be available at the workplace. The use and storage of flammable and explosive products must be reported to the designated administrator for the contract. We expect that CMP's collaborative partners will actively work to substitute hazardous chemicals and materials for materials that are less hazardous to health and with a lower risk for environmental damage.

Spills and preparedness

CMP expects our collaborative partners to be adequately prepared for dealing with spills and for management of fire. If an incident occurs within CMP's areas of operation, it must be dealt with in accordance with the responses outlined in CMP's contingency plans. At all times, any collaborative partner who becomes aware of any spills of oil and chemicals in CMP's areas of operation must inform CMP about this, and it must be able to display statistics on spillage in their own production on request.

Climate impact and emissions polluting the air

Vendors are expected to have a goal of reducing the climate impact from the company's activities. When using vehicles and machinery within our grounds, it is a requirement that the emission of CO₂ and substances polluting the air have been taken into account in the choice of equipment. For equipment used within CMP's grounds, it is expected that electric vehicles and machinery will be used to the extent feasible or that renewable fuels will be used. Machinery and equipment must be of modern technology, reliable and approved for use in the relevant country. At least 20% of vehicles must meet the requirements of the highest Euronorm (European Standard) and no more than 80% of the normally used construction equipment may be more than 6 years old. Unnecessary idling of vehicles/vessels must be avoided.

Energy efficiency and resource efficiency

CMP expects its collaborative partners and vendors to optimise and plan their production in an energy and resource-efficient manner, plus to plan deliveries to CMP in a manner that takes the consumption of fossil fuel into account.

Prevent nuisance

When noisy and/or dusty work is being performed, it is a requirement that this is planned and conducted in such a manner that inconvenience or nuisance to employees, neighbours and others is reduced to the least possible. Concerning work conducted within CMP's areas of operation, the limitations in the noise requirements which CMP is subject to must be adhered to and complied with at all times.

Health and Safety

Work environment health and safety management system

CMP requires its collaborative partners to work conscientiously to manage and control the working environment for the purpose of maintaining a safe working environment and healthy working conditions. If the work environment management system is not certified by a third party, it must be otherwise shown that work is systematic with health and safety improvements based on the company's work environment policy, which must include both physical and psychological risks.

Risk analysis and protection

Prior to commencing work, it is required that a risk analysis is conducted and that precautions have been taken for the protection against physical and psychological harm. Protective gear, appropriate work clothes and personal protective equipment must be provided at the workplace. It must also be ensured that the equipment is used properly and that the personnel are adequately educated and trained to know how and when this should be used.

Training

Employees must receive training so that they are able to perform their work in a manner that is safe and secure in terms of occupational safety and in regards to the environment.

Smoking policy – substance abuse policy

Smoking, including e-cigarettes, is not permitted in buildings and in certain designated outdoor areas. For safety considerations, it is not permitted to consume or be under the influence of alcohol, drugs or euphoricants within CMP's areas of operation. Violation of this will lead to expulsion, and an end to the working relationship.

Fair Working Conditions

Freedom of association, and collective bargaining

CMP expects its collaborative partners to recognise the right of employees to freely organise and to conduct collective bargaining negotiations.

Employment relationship and remuneration

A requirement is imposed by CMP that its collaborative partners enter into written, legally binding employment agreements with their employees and that employment law is complied with. Rules concerning remuneration and industry standards must be respected and there is zero tolerance for attempts to circumvent this, including any effects at social or wage dumping.

It must be ensured that wages allow employees to be able to support themselves and their families. Wages are to be paid in a recognised means of payment and on a consistent basis. Equal pay must be paid for equal work, and local pay and working terms and conditions must be given to all contractors.

Physical environment

It must be ensured that employees work in a proper physical environment so that the work can be conducted safely and without the risk of short-term or long-term damage to health. There must be access to WC facilities, break facilities, and clean drinking water. If personnel are offered accommodations, this must be done under sound and reasonable conditions. Vendors working within CMP's areas of operation are responsible for providing adequate infrastructure for their employees. CMP's facilities may only be used by prior separate agreement.

Working hours

In addition to the fact that it is a given that all local, regional and international laws and regulations must be complied with, CMP requires that the work of the employees be planned with a sustainable balance, so that health, safety and their private life are protected.

Remuneration

Wages must be paid when due and in a legal tender. Deductions from wages must be transparent and may never be used as a disciplinary measure.

Forced labour

Employees must be treated with dignity and respect. We have zero tolerance for punishment; mental and physical coercion will not be tolerated.

Child labour

Children's rights must be respected and no child labour will be tolerated. If it is found that employees are encompassed within international and local rules on child labour, support must be provided to bring them back to an educational programme.

Discrimination

No one may be discriminated against on the basis of skin colour, ethnicity, religion, gender, sexual orientation, age, disability, political beliefs, or other factors not relevant to the work. Everyone must be treated equally, and factual and relevant considerations must be the basis for decisions relating to employment relationships.

Clauses

Collaborative partners are prohibited from requiring unfair work clauses from employees, such as so that their possibility to change jobs is impaired to a degree that is not commensurate with the financial compensation. CMP reserves the right to incorporate specific social clauses into contracts; this may relate to apprenticeship clauses for example, for the purpose of ensuring that social responsibility is ensured.

Human and Civil Rights

CMP encourages our collaborative partners to support international recognised guidelines relating to human and civil rights. This includes that threats, violence, harassment, and bullying are not tolerated, and that our collaborative partners carry out self-monitoring and internal inspections in order to ensure this.

Communication and Protection of Data

In collaborative relationships, it is a clear expectation from CMP that all rules of GDPR (General Data Protection Regulation) are respected and incorporated into all relevant procedures, in order to protect both internal and external interested parties. We expect that information will be treated confidentially as a starting point, and only shared with third parties, including on social media, by prior agreement.

Protection of Property and Equipment

CMP desires to protect its own assets and therefore these assets and protections must be respected by CMP's collaborative partners. When present within our areas of operation and especially in the vicinity of CMP's property and equipment, special care and responsibility must be exercised so that no damage nor theft occurs. The use of CMP's assets may only occur after specific prior authorisation.

Anti-Corruption and Money Laundering

The United Nations Convention against Corruption, a multilateral anti-corruption treaty, must be respected. Undue influence may not be exercised by means of bribery, facility payments, or other methods. CMP expects our collaborative partners to use legal and objective criteria in decision-making processes, so as to avoid nepotism and conflicts of interest or problems with competing interests. When entering into contracts, CMP must be informed if there is a suspicion that the contracting entity has financial or personal interests in the contract. CMP's employees may not receive gifts or free entertainment unless it has a purely symbolic value, and CMP expects its collaborative partners to refrain from offering such benefits. CMP does not accept the proceeds of illegal activities and our collaborative partners must comply with the Guidelines of the EU Anti-Money Laundering (Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing).

Whistleblowing

CMP has an established whistleblowing process for individuals to be able to report allegations of violations of legal requirements and/or other irregularities. Employees, customers, suppliers, partners and others may report observations related to behaviour that may be possible to be regarded as being illegal/unlawful or unethical. Anyone who makes a report is guaranteed that they will not suffer retaliation due to the reporting, neither at the time of reporting nor in the future. If the individual so desires, there is a possibility to remain anonymous even if the disclosure of identity would assist in the clarification what has been reported. All reports are received and processed by CMP senior management via involving the requisite expertise. The persons assigned the responsibility to receive whistleblowing reports can be reached via <https://cmport.whistleblownetwork.net>.

Compliance with the Guidelines

The requirements and expectations set out in this Code of Conduct apply to all collaborative partners, and are legally binding in all contracts entered into with CMP. CMP expects our collaborative partners to ensure that the principles are also adhered to in supply chains.

If a collaborative partner becomes aware that there are one or more requirements or expectations in this Code of Conduct that are not being fulfilled, CMP must be promptly informed of this. CMP is committed to working together to raise the level of our collaborative partners' compliance. Deviations may be resolved by agreed action plans with follow-up checks. Our response to non-compliance will be assessed on a case-by-case basis, and CMP reserves the right to renegotiate or discontinue contracts due to a lack of due diligence in relation to this Code of Conduct. CMP is entitled to conduct inspections of the facilities of our collaborative partners and their subcontracted vendors, either directly by its own personnel or via third parties.