

# Labour Code of Conduct 2025

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# Introduction

Being respectful, trusting and inclusive is what we can expect of one another when working in DFDS, regardless of time and place. Since 1866, DFDS has acted upon our commitment to care for the safety and wellbeing of our employees.

As we grow and transition towards a more sustainable business respected for providing reliable end-to-end services for people and goods, our responsibility is to keep nurturing the good working environment in DFDS.

This Labor Code of Conduct (LCoC), describes our minimum standard for critical working conditions of our employees. The aim is to establish clear expectations to our working conditions and to prevent, remedy and account for any adverse human rights events across the company. We also encourage our suppliers and partners across the value chain to uphold similar standards in their own operations.

This includes the aspiration to promote a trusted and inclusive work environment that respects the individual. It is important to remember that perception shapes impact – what we intend to communicate through

words or actions may not always align with how others experience it. Being mindful of this helps us foster a more respectful and inclusive environment, where everyone feels heard and understood.

At DFDS, maintaining a culture of integrity means speaking up when something doesn't seem right. We encourage everyone to report any concerns about potential non-compliance with this Labour Code of Conduct (LCoC) through the appropriate channels, such as the whistleblower function, your local HR department, or your manager, as also aligned in the DFDS Code of Conduct. All reports will be handled with confidentiality and care, and no one will face retaliation for raising a genuine concern in good faith.

With this Labour Code of Conduct, I hope that no one is in doubt about what to expect when working in DFDS. We are thousands of colleagues with the passion, the skills and the commitment to continue making DFDS a great place to work.

**Erika Markvardsen**  
Chief People Officer DFDS

This Labour Code of Conduct applies to all DFDS employees, both on land and at sea, including permanent, temporary, and hourly-paid staff. While consultants and agency workers are not directly covered, we expect our partners to uphold similar standards.



## Working hours

### **Our commitment:**

At DFDS, we believe in the importance of having a healthy work-life balance. We are committed to ensuring legal and reasonable working hours for all employees.

### **How we do it:**

- Working hours across all locations must comply with applicable local legislation. Managers and employees are encouraged to set realistic performance targets that can be achieved within reasonable working hours. Managers should avoid requesting excessive overtime.
- All overtime work beyond what has been contractually agreed should be done voluntarily and must be aligned with local regulation. Managers are responsible for ensuring that no unlawful overtime work occurs.
- At sea, situations can arise where the crew will have to work overtime. In such situations, the crew will be granted adequate compensation.
- All employees and managers must respect colleagues' free time and holidays. There is no obligation to read or respond to work-related messages outside regular working hours. In the event of an emergency, contact should be made through the appropriate channels.

## Living wage

### **Our commitment:**

We are committed to ensuring that all employees receive fair pay. The wage should enable employees to maintain a decent standard of living in accordance with the cost of living in their location of employment. For employees working at sea, the wage should enable them to maintain a decent standard of living in accordance with the cost of living in their country of residence.

We also strive to ensure equal pay for equal work across comparable roles. We are working towards greater alignment across regions and functions, while recognising that local market conditions and legal frameworks may differ.

### **How we do it:**

- All salaries and benefits must meet the specified minimum wage set by national law or the applicable collective bargaining agreement. Further, we aspire to meet external industry benchmark standards. We aim to conduct regular salary reviews that consider factors such as inflation, company performance, and individual contributions, where feasible and in accordance with local practices.
- All employees will be issued with an employment contract that outlines relevant terms and conditions including salary and pay frequency.
- We are committed to not using a reduction in salary as a singular sanction against employees. Pay reductions may occur as a result of a disciplinary demotion that lead to a lesser level of responsibility.
- We are committed to ensuring that all employees are covered by social security as part of their salary package, in accordance with the regulations applicable in their country of employment.

## Leave

### **Our commitment:**

We recognise the importance of adequate rest periods and leave to prevent fatigue and support the well-being of employees. DFDS is committed to providing every employee with the rest, breaks, and leave necessary to maintain a healthy work-life balance, in compliance with local and maritime regulations. This includes access to various types of leave such as annual leave, parental leave, sick leave, bereavement leave, and other types of statutory or company-supported leave relevant to the employee's location and circumstances.

### **How we do it:**

- As a minimum, we adhere to local legislation and collective bargaining agreements concerning breaks, leave, and annual leave.
- As an inclusive workplace, we are committed to respecting various religious traditions when possible.



## Equality, harassment and discrimination

### Our commitment:

In DFDS, we have a zero-tolerance policy on discrimination, bullying, and harassment of any kind. All employees should feel respected and that they are always treated with dignity. We believe in the importance of equal treatment of all employees.

### How we do it:

- The DFDS Code of Conduct, which includes anti-harassment and anti-discriminatory guidelines is made available to all employees and is included in onboarding materials. In many areas, it is also reinforced through briefings and awareness sessions.
- We emphasise equal treatment for all, regardless of gender, race, ethnicity, nationality, religion, political beliefs, sexual orientation, age, disability, neurodiversity, or marital status.
- We have a designated toolbox which covers essential themes such as sexual harassment prevention, bias identification, and fair recruitment practices.
- We show zero tolerance towards any harassment or abuse. No employee should ever face humiliation, physical or mental abuse, sexual harassment, or any other form of mistreatment.
- We recognize the importance of physical safety in the workplace and are committed to maintaining an environment free from physical threats or unsafe conditions.
- We have clearly defined grievance mechanisms with diverse reporting channels to ensure that employees can feel safe and report violations without fearing retaliation (See page XX) We ensure that managers have the appropriate skills and tools to remedy many types of issues.



## Health & Safety

### Our commitment:

We are committed to providing a safe and healthy working environment where physical safety and mental well-being for all employees is prioritised. We strive to prevent accidents, injuries, and occupational illnesses through proactive measures.

### How we do it:

- We comply with all domestic and relevant health and safety legislation and industry standards. Regular risk assessments are conducted to identify and mitigate potential hazards.
- We provide training and resources to ensure employees understand safety procedures and can act responsibly
- Employees receive training in health and safety including the importance of reporting incidents. All reported incidents are investigated, and corrective actions are taken to prevent recurrence.
- We encourage a culture of safety where employees feel empowered to speak up about unsafe conditions.



## Freedom of association and collective bargaining

### Our commitment:

We are committed to ensuring our employees' right to associate freely through unions, workers' associations, and other modes of collective bargaining.

### How we do it:

- All employees have the right to form and join associations without fear of discrimination or retaliation.
- We support collective bargaining agreements and we don't interfere with union activities. In areas where collective bargaining is prohibited by law, we will allow employees to develop alternative ways to express their opinions and care for their rights.
- Employees are welcome to elect employee representatives, and we engage with them openly and constructively in good faith and with transparency.



## Employee privacy

### Our commitment:

We are committed to secure the right to privacy for all employees, including digital rights.

### How we do it:

- We are committed to gather the least amount of personal data needed. Employees can at any time request information on how we use their personal data and what data we have collected.
- We focus on transparency and fairness in the use of email and device monitoring, as well as algorithmic decision-making.
- We have an extensive GDPR Policy, and employees handling personal data receive annual GDPR training. This is mandatory for office-based roles and adapted where relevant for other functions.
- We always adhere to national legal requirements regarding the collection and disposal of data.
- Security cameras are installed as a safety and security measure, and employee privacy is always considered before installation and use.



## Forced and bonded labour

### Our commitment:

Under no circumstances should an employee work for DFDS on an involuntary basis, nor work for us due to any sort of threat of penalty or sanctions. We are committed to ensuring that no employee is subjected to forced, bonded, or otherwise coercive labour practices.

### How we do it:

- All employees receive a written employment contract in their local or working language.
- All employees have the right to terminate their employment and to receive any salary owed and reimbursement of genuine business expenses.
- We will never withhold original copies of employees' identification documents.
- We strive to ensure that no worker is charged recruitment fees or related costs as a condition of employment.
- We strive to ensure that any third-party providers of labour used by DFDS hold the proper certifications and licenses to operate.
- We perform regular risk analysis on our suppliers to identify potential risks related to forced or bonded labour. This includes data driven analysis and conducting internal and third-party audits to ensure compliance with our standards and legal obligations.



## Child labour and young workers

### Our commitment:

We are strongly committed to never accept child labour.

### How we do it:

- We are committed to always adhering to local legislation regarding the employment of persons under the age of 18 in accordance with ILO guidelines. We will not employ any person under the age of 15 regardless of local legislation.
- We verify age through official identification documents such as passports or national ID cards, in compliance with legal requirements.
- Persons under the age of 18 are withheld from working night shifts, working tasks that pose a risk of physical harm, or working with hazardous materials. In specific training contexts, such as cadet programmes or internships, exceptions to night shift restrictions may apply under supervision and in accordance with maritime training standards.
- If child labour is confirmed within a third-party labour provider, we will take swift measures to ensure remediation in the best interest of the child.

# Human rights' due diligence

Our approach to identifying, preventing, and mitigating impacts



## Identify risks

Locate human rights risks and impacts



## Assess risks

Evaluate the severity and probability of risks



## Integrate and act

Implement actions to address identified risks



## Track performance

Monitor the effectiveness of actions



## Communicate

Report on progress and ensure transparency

In alignment with the UN Guiding Principles on Business and Human Rights, we will carry out human rights' due diligence based on the minimum requirements described in this Labour Code Conduct.

This includes identifying and assessing risks – both actual and potential – to human rights and acting upon the findings. The process also includes thorough communication on how and which measures are taken to mitigate them.

This approach supports our broader sustainability commitments, including those under the Corporate Sustainability Reporting Directive (CSRD).

Our human rights due diligence approach is aligned with the UN Guiding Principles on Business and Human Rights.



# Grievance handling and non-retaliation

We are committed to fostering a culture where speaking up is the norm, not the exception. It is our shared responsibility to voice and address any breaches of this Labour Code of Conduct, or any other unwanted behaviour. Concerns can be raised through our established reporting channels, and managers are equipped with the skills and tools to handle a wide range of issues effectively.

Reporting can be done anonymously through the DFDS Whistleblower Line. It is managed by an independent third party to ensure

impartiality and confidentiality. DFDS follows a structured grievance process that includes initial review, formal investigation, and resolution phases, all governed by strict confidentiality safeguards and clear timelines.

We strictly prohibit retaliation against anyone who raises an issue, complaint, or concern in good faith. Every case will be handled fairly, equitably, and with respect for all parties involved.

**If in doubt, speak up. Your voice matters.**

## Reporting channels

### Land

- Direct manager/Supervisor
- Local HR department

### Sea

- Head of Department/Master
- Crewing Department

- Any member of the Executive Management Team (EMT)

- [The DFDS Whistleblower line](#)



