

"KESS" European Sea Highway Services GmbH - Implementation Guidelines for the Charter of Conduct

"KESS" European Sea Highway Services GmbH (hereinafter called as "KESS") has established the following implementation guidelines for putting the spirit of the Charter of Conduct into practice.

1. Respect for human rights

"KESS" will consistently respect the human rights of all stakeholders involved in its business activities. "KESS" will strive to develop and improve safe and pleasant work environment for its employees to provide them with comfortable and affluent lives.

1-1 "KESS" will respect the human rights of all people, strive not to violate or discriminate against the human rights of people affected by its business activities and not be complicit, even indirectly, in human rights abuses.

1-2 "KESS" will respect international norms related to human rights, and strive to comply with laws and regulations related to labour and human rights applicable in each country and region where it operates.

1-3 To minimize any adverse impact it has on human rights, "KESS" will conduct human rights due diligence, assess both actual and potential human rights risks associated with its business activities, and take measures to prevent or mitigate them.

1-4 "KESS" will respect the rights of socially vulnerable people exposed to risks of their human rights being violated, such as indigenous people in the regions where it operates and contribute to the development of an inclusive society.

1-5 "KESS" will protect its employees from forced or compulsory labour including overly long working hours, strive to eliminate all forms of forced labour such as bonded labour, human trafficking and slave labour, including any unintentional complicity in such activities. "KESS" will also strive to effectively eliminate child labour.

1-6 "KESS" will strive to respect the diversity of employees and ensure that employees are treated equally without discrimination on any grounds, including but not limited to nationality, race, ethnicity, gender, sexual orientation, gender identity, creed or religion, disability, etc., in terms of recruitment, employment and worker treatment.

1-7 "KESS" will strive to prevent all forms of harassment, including power harassment and sexual harassment, as well as slander and defamation that harms the dignity of individuals. "KESS" will promptly and adequately respond to any such event that may occur.

1-8 To assist each employee of the corporation in the maximization of their potential and their achievement of self-actualization, "KESS" will strive to adequately assign personnel to tasks and provide the education, training and other systems necessary to facilitate the balance between career planning and human resource utilization.

1-9 "KESS" will evaluate personnel in an objective and unbiased manner through a due process of appraisal and it will treat employees fairly and equally.

1-10 "KESS" will promote a healthy work-life balance by establishing necessary systems such as work schedule flexibility and leave systems.

1-11 To promote health-conscious management, "KESS" will properly manage workplace health conditions, maintain a safe and appropriate work environment and support employees' efforts to maintain their mental and physical health.

1-12 "KESS" will ensure the safety of its employees in their work environment ensuring there are sufficient security systems in place.

2. Compliance with laws, regulations and other social norms

"KESS" promises to comply with applicable laws, regulations, rules and other norms of behaviour in both the domestic and international community and conduct its corporate activities properly in good faith through fair, transparent and free competition.

2-1 "KESS" promises to comply with laws and regulations in each country and region where it operates, such as competition laws, anti-corruption/bribery laws, intellectual property laws, laws and regulations regarding insider trading and laws and regulations regarding security trade control policies, as well as the conventions and rules of the international community related to these matters, and the values of society, including ethical and moral standards.

2-2 "KESS" recognizes that the regulations on fair competition in each country in which it operates are the basic rules for fair, transparent and free competition, and it promises to neither enter into any agreement in breach of these regulations nor abuse its dominant position.

2-3 "KESS" procurement activities and business transactions will always be in line with the appropriate policies outlined below and it will always maintain fair and sound relationships with its business partners.

1 Purchasing decisions will be made with opportunities provided fairly and the fair and impartial evaluation of not just the economic aspects of the matter, such as quality, cost and delivery, but also consideration of society and the environment.

2 Procurement activities will be conducted in compliance with laws, ordinances, social norms and business ethics and cooperative relationships based on mutual trust are established with business partners.

3 Procurement activities will be conducted by duly considering sustainability and responsibilities to society, including respect for human rights, health and safety and environmental preservation.

4 Transactions with business partners will be conducted in an appropriate manner for coexistence and co-prosperity throughout the supply chain. Sufficient consultation shall be conducted when determining transaction terms such as prices, including regular opportunities.

5 Information gained through the procurement process will be properly managed.

2-4 "KESS" will maintain transparent and sound relationships with governments and regulatory authorities.

2-5 "KESS" will neither offer nor receive any excessive entertainment, gifts or other favours beyond commonly accepted business courtesies.

2-6 "KESS" will neither offer nor receive bribes, and it will not give or accept entertainment, gifts or other favours with the aim of receiving unfair benefits or preferential treatment.

2-7 "KESS" will not tolerate any acts by its officers and employees for the benefit of themselves or third parties that may harm the interest of the company.

2-8 "KESS" will seek to protect and fully utilize its intellectual property and respect the intellectual property rights of others.

2-9 "KESS" will establish strict internal rules and procedures to prevent any insider trading or suspicious activities from occurring and keep every member of "KESS" duly informed of these rules and procedures to ensure compliance.

2-10 "KESS" will establish an internal reporting system and necessary measures for continually monitoring its compliance status and it will respond to any problem that may arise in a timely and effective manner.

2-11 "KESS" will not treat any group employee adversely for complying with applicable laws, regulations or policies regarding internal reporting, etc.

2-12 "KESS" will establish a mechanism for ensuring compliance with laws and regulations concerning security trade control policies.

2-13 "KESS" will protect and manage its confidential information appropriately and strictly, and it will use it in its business activities.

2-14 "KESS" will strictly manage personal information, customer information and information related to the privacy of stakeholders, such as customers, business partners or employees, in accordance with laws, regulations and social norms.

3. Earning, maintaining, and enhancing the trust of all stakeholders

"KESS" will earn, maintain, and enhance the trust of all stakeholders, including customers, business partners, shareholders, employees, governments, local communities and the international community.

3-1 To promote extensive communication with stakeholders such as shareholders and investors, "KESS" will disclose all facts and corporate information, including accounting and financial information, and other accurate accounting and tax management records, in a timely and appropriate manner.

3-2 "KESS" will promote communication with shareholders and investors through general shareholders meetings and investor-relations activities.

3-3 "KESS" will comply with all applicable laws, regulations, rules, policies and corporate ethics in its advertising and public relations activities, including the use of social media. Additionally, "KESS" will eliminate false and exaggerated statements and ensure that information, content and statements are fair, accurate and appropriate, with due regard for the avoidance of social discrimination and human rights violations.

3-4 "KESS" will provide customers with adequate information concerning its services and will respond to inquiries in good faith.

3-5 "KESS" will duly consider harmony with the public interest in recognition of the public nature of international maritime transport.

3-6 "KESS" will contribute to the development of each country by providing knowledge and expertise, cooperating in human resources development and deepening friendships with related companies and organizations.

3-7 "KESS" will ask local business partners in each country to understand the spirit of its Charter of Conduct and its approach to sustainability and to improve their activities as needed.

4. Promotion of safety in navigation and cargo operations

"KESS" regards safety in navigation and cargo operations as a top priority and strives to provide higher quality, safer and more optimized services taking a customer-first approach.

4-1 "KESS" recognizes safety in navigation and cargo operations and the consequent preservation of the global and marine environment as its immediate top priority, and it ensures the safety and quality of its services centered on international maritime transport.

4-2 To contribute to society through safety in navigation and cargo operations, "KESS" will enhance its management structure for ensuring safety in navigation, including its crisis management capabilities, strengthen its ship management system and secure and train maritime officers.

5. Proactive efforts to address environmental issues

To realize a sustainable society, "KESS" recognizes that global environmental efforts are a key issue for all of humanity and that they are essential for both business activities and the existence of the company. Additionally, "KESS" is committed to proactively engaging in the development of a low-carbon or carbon-free transition of both "KESS" itself and society.

5-1 "KESS" will contribute to the creation of a global carbon-free society by promoting initiatives to reduce environmental impact throughout its supply chain, working toward the Group's policy of achieving net-zero GHG emissions by 2050.

5-2 "KESS" will promote efforts to establish a material-cycle society by reinforcing the efficient use of energy and resources (including green ship recycle).

5-3 To continuously reduce the adverse effects its business activities have on the environment, "KESS" will set goals and targets for environmental conservation, endeavour to develop technology and establish new business models that will help reduce these adverse effects.

5-4 "KESS" will consider all of the environmental risks contingent on its business activities and take measures to address them.

5-5 "KESS" will promote various efforts to conserve biodiversity and realize sustainable society, such as minimizing the impact of ballast water and living organisms that attach to ship hulls on ecosystems.

6. Promotion of Digital transformation (DX) and innovation

Through DX and innovation, "KESS" refines its strengths in safety, quality and environmental technology to provide new values for customers and society, embracing changes.

6-1 "KESS" is committed to pursuing innovation in the areas of safety, quality and environmental technology for the establishment of a low-carbon or carbon-free society.

6-2 "KESS" will further advance the digitalization of information, business processes and vessels, enhance its core safety, quality and environmental technology value through the utilization of data and digital technology, and increase the added value of its services to further strengthen competitiveness.

7. Contribution to society

As a good corporate citizen, "KESS" will make ongoing efforts to contribute to the development of sustainable society.

7-1 "KESS" will set up an in-house structure for promoting social contribution activities.

7-2 "KESS" will gather information about social issues worldwide, identify priority sustainability issues in light of its management philosophy and promote social contribution activities using its resources.

7-3 "KESS" will continue to proactively contribute to society by cooperating and collaborating with a broad range of stakeholders, including NPOs, NGOs, local communities, government agencies and international organizations.

7-4 "KESS" will support its employees' voluntary participation in social activities such as volunteer work.

7-5 "KESS" will prepare for possible relief activities and the provision of aid due to a disaster or other marine accident and increase its contributions to society leveraging its expertise and technology, including the transportation of necessary resources when needed.

7-6 "KESS" will handle donations and sponsorships for contributing to society in a transparent and reasonable manner in compliance with relevant laws, regulations and social norms to ensure that they do not constitute unfair profit sharing or inappropriate expenditures.

8. Thorough risk management

"KESS" recognizes the various risks associated with its business activities and will thoroughly manage them to fulfil its responsibilities to society as a corporation.

8-1 "KESS" will address various business risks, such as cyberattacks or terrorism, to keep them within the extent of sustainable business continuity and establish policies in advance to mitigate the impact of risks to corporate management should they materialize.

8-2 "KESS" will develop a business continuity plan (BCP) and strive to enhance response capabilities during normal times to prepare for emergencies such as large-scale natural disasters or infectious diseases.

8-3 In cooperation with authorities and organizations concerned, "KESS" will endeavour to eliminate anti-social forces and mobilize the entire corporation to act in accordance with the law and prevent them from harming it.

"KESS" management recognizes that it is its role to realize the spirit of the Charter and leads the implementation of this Charter in an exemplary manner while setting up effective mechanisms for its implementation throughout "KESS". The management also seeks to cooperate with its business counterparts. From the perspective of risk management, the management establishes internal systems for preventing incidents in breach of the Charter, and, should such an event occur, "KESS" management will decisively resolve the problem, conduct a thorough investigation to determine the causes of the matter and take preventative measures. Additionally, management will expeditiously and accurately disclose information and fulfil its duties to be accountable to society.

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