

Anti-corruption policy for the Viking Line Abp Group

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Purpose

This policy was prepared by the Viking Line Abp Group (henceforth 'Viking Line') to clarify and complement the core principle opposing all forms of corruption set out in Viking Line's Code of Conduct now in force. The policy is subject to regular review to ensure that the descriptions of laws in effect are accurate and to make sure that the policy meets the business's requirements concerning relevant anti-corruption principles.

Core principles and scope

Viking Line has a zero tolerance of all forms of corruption, and Viking Line Abp, its Group companies, management and all employees (henceforth 'employees') as well as third parties such as Viking Line's sub-contractors who act on behalf of Viking Line are expected to follow this policy in all contexts. It is strictly prohibited to directly or indirectly receive, request or offer such benefits that can affect one's decision-making or objectivity or affect the recipient's. Violations of this policy and laws in effect can have a significant impact on Viking Line's operations and result in irreparable damage to the company's brand. It is thus vital that Viking Line's employees conduct themselves ethically and in accordance with the provisions in this policy.

In addition to this policy, one must always take into account local laws concerning bribes and corruption. If applicable laws or industry practices in effect at any time contain more stringent regulations than those set out in this policy, such laws or practices shall be followed. Every person covered by this policy is personally responsible for knowing and understanding the content of this policy and all applicable local regulations and laws. Furthermore, it is the responsibility of each department manager at Viking Line to make sure that all of his or her subordinates know and understand this policy.

What are corruption and bribes?

Corruption includes all such activities where an employee abuses his or her position or responsibility for personal or commercial gain. Corruption includes bribes and improper use of Viking Line's assets as well as conflicts of interest.

A bribe is defined as directly or indirectly offering, receiving or requesting such a benefit that can affect one's own conduct, decision-making or objectivity, or that of the recipient. A bribe need not necessarily be a monetary gift but can consist of anything with a value to the recipient, such as various gifts, rewards and other benefits.

Gifts and business entertainment

Customary business gifts, hospitality and business entertainment as a sign of politeness are part of normal business operations, as is socializing with customers, partners and suppliers. Offering benefits in business relations is permitted as long as the benefit is offered openly, the benefit is modest and the benefit is offered in compliance with the laws in effect and with Viking Line's internal policies and regulations.

It is strictly prohibited to offer, promise or provide a benefit in the exercise of public authority (for example, in the performance of regulatory or auditing tasks) and public tender procedures. When this does not take place in conjunction with the exercise of public authority, government representatives can be offered customary and reasonable hospitality or promotional products of negligible value. However, employees shall never offer such benefits that can influence or be suspected of influencing the exercise of public authority or the recipient's objectivity.

More detailed instructions are available in the regulations concerning the giving and receiving of benefits in the Viking Line Group.

Procurement and contracts

The provisions in this policy shall be respected in all business transactions, and employees shall always conduct themselves openly, honourably and professionally. Employees shall always follow this policy in choosing suppliers, signing contracts and making purchases. It is strictly prohibited to receive personal discounts or other personal gain in any business transaction.

All contracts with Viking Line's business partners shall be made in writing and archived in the appropriate way. All payments shall be made based on a valid invoice with a specification of goods delivered or services provided and any other costs. Payments shall be made in accordance with Viking Line's general payment procedures.

Employees shall protect Viking Line's interests in all situations. All decisions made shall always be made without consideration to personal gain, and it is not acceptable for an employee to take part in the decision-making on a matter that this person may have a personal interest in. Any conflicts of interest shall always be reported to the employee's immediate supervisor, even if the employee does not believe the conflict affects his or her objectivity.

Conflicts of interest

Conflicts of interest can arise when an employee's financial or other personal interests are or can be interpreted as being in conflict with Viking Line's interests. Conflicts of interest can arise when a decision results in, or can be as interpreted as resulting in, a benefit or disadvantage for the employee or that person's relatives. Conflicts of interest can arise in business transactions, among other situations, such as in the choice of suppliers, sponsorships, provision of benefits and recruitment.

Viking Line's employees shall always act in Viking Line's best interest without decision-making being influenced by personal interests or other conflicts of interest. Employees shall not take part in decision-making processes in cases where there is a conflict of interest.

Sponsorships

Viking Line can sponsor activities that are in line with Viking Line's values. All sponsorships shall always be based on a written contract and take place in accordance with this policy and Viking Line's sponsorship policy. Such sponsorships that can be interpreted as undue influence on someone's objectivity or a business transaction are prohibited.

Facilitation payments

It is prohibited to directly or indirectly make facilitation payments. Facilitation payments are usually considered to be small amounts of money paid unofficially to a public official or government representative to speed up or facilitate administrative processes.

Reporting and repercussions

If an employee sees or suspects a violation of this policy, he/she shall take up the matter with his/her immediate superior, or inform Viking Line's Legal Counsel or the Business controller in charge of internal control. Viking Line's employees shall not investigate a suspected violation of this policy on their own.

All violations of this policy reported or committed are subject to a thorough investigation. An employee shall never fear any negative repercussion as a result of reporting a case. The same applies if an employee identifies issues that have not been made sufficiently clear in this policy.

A violation of this policy can lead to disciplinary measures and also to the termination of employment. A violation of the laws in effect can also lead to civil or criminal proceedings.