

SVITZER

DATA ETHICS POLICY

Svitzer Group A/S, CVR no. 44 79 14 47

1 Data Ethics in Svitzer

The policy is designed to ensure that data is collected, stored, processed, and used responsibly across the organisation. It defines the principles to guide all employees in Svitzer Group A/S, CVR no. 44 79 14 47 (the “Company” or “Svitzer” together with its subsidiaries the “Group”) when working with data. The following four principles are the foundation Data Ethics within Svitzer.

1.1 Transparency

1.1.1 Collect and use data in a transparent manner. Ensure that individuals are aware of the data being collected and how it will be used. This includes providing clear and concise privacy notices and obtaining explicit consent from individuals before collecting their data.

1.2 Respect

1.2.1 Use data only for the purpose it was collected for. Ensure that data is not used in a way that could cause harm to individuals. This includes ensuring that data is accurate, up-to-date, and relevant to the purpose for which it was collected. Importantly, this responsibility is shared by everyone in our organisation.

1.3 Innovation

1.3.1 Use data to innovate and optimise services, sustainability initiatives, and operations while adhering to regulations and high ethical standards. This includes using data to improve customer experience, reduce environmental impact, and increase efficiency.

1.4 Security

1.4.1 We ensure data compliance with applicable data protection laws. Store and process data securely. It’s a priority to ensure that data is not accessible to unauthorised personnel. This includes implementing appropriate technical and organisational measures to protect data against unauthorised access, disclosure, alteration, or destruction.

2 Governance for Data Ethics in Svitzer

2.1 New Technologies and Bias Control

2.1.1 Before adopting new technologies, we conduct risk assessment to identify ethical implications. We evaluate their impact on data privacy, security, and potential biases.

2.2 Ongoing Processes Related to Discuss Data Ethical Questions and Dilemmas

2.2.1 A dedicated forum is established to facilitate ongoing discussions on data ethical questions and dilemmas. Employees are encouraged to report ethical concerns without fear of retaliation.

Approved by the Board of Directors on 26 April 2024.