

STROMMA

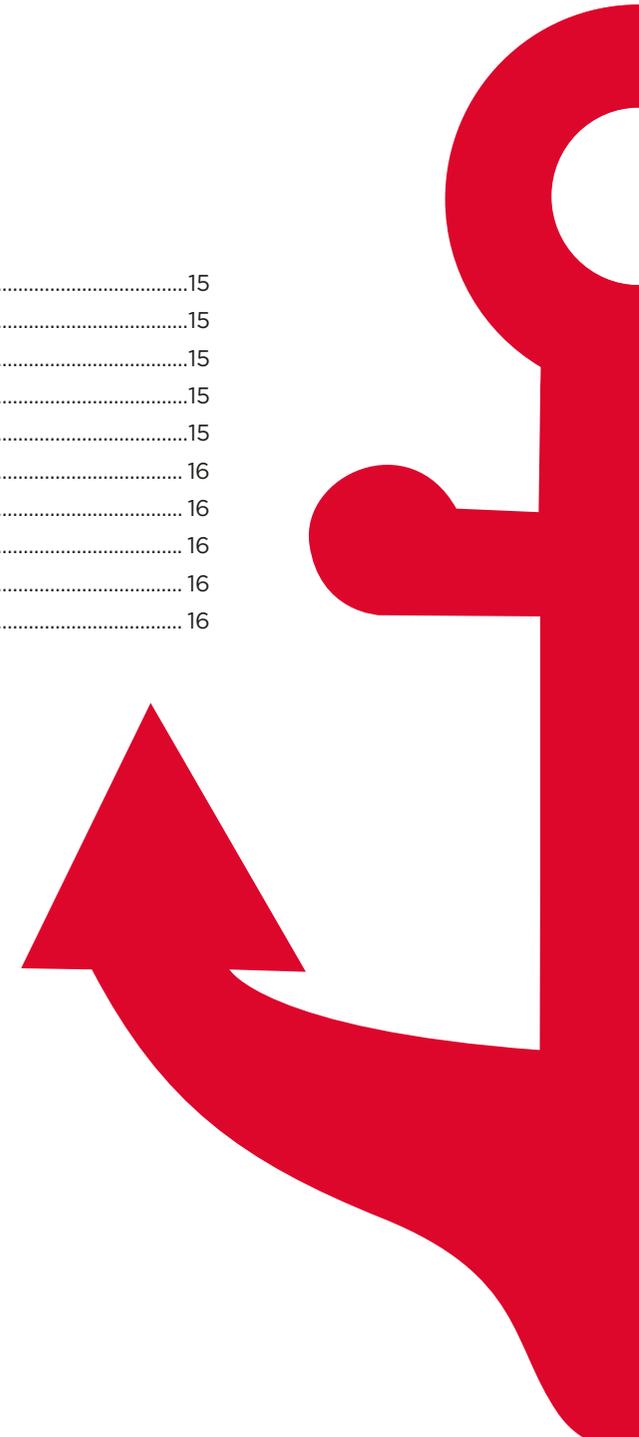
CODE OF CONDUCT



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MESSAGE FROM OUR CEO

Dear Colleagues and Partners

Prevailing in times of challenge and change has been possible for Stromma due to a strong foundation, a clear set of values and people making the right decisions.

Our history goes back to 1809 and today we are the largest provider of experiences in the Nordics delivering on our mission "Memories for Life". Our continued success is rooted in our values, and a strong commitment to conducting business with focus on ethics, integrity, fairness, and respect.

We abide by the law where we operate, and we honour the deals we make with employees, partners, unions, and organisations. We have committed to the principles of UN Global Compact and align our business objectives and behaviour with the UN development goals.

Stromma Business Ethics & Code of Conduct (CoC) is built on our mission and values. Our CoC explains what we stand for and what is expected from us as a company and as individuals in order to make the right decisions even when this means we may have to pass business opportunities.

Stromma and our reputation rely on all of us to follow the letter and the spirit of our CoC. We recognise, you may not find an answer to all situations and dilemmas in this document. However, following our values, your sound judgement and common sense in everything you do in your role and daily interactions with others, everything you do on behalf of Stromma or whenever you act as an ambassador for Stromma will guide you.

Our CoC will not only provide guidelines and expectations for our behaviour, but also for how to address doubts and concerns regarding behaviour.

I encourage you to speak out if you are in doubt or ever feel your wellbeing, our values, integrity, or reputation are at risk. Use our internal channel our Speak Out channel. Speaking out will help us take care of each other, the environment and Stromma – and to continuously improve.

I am proud to be part of Stromma and of our focus on maintaining a sustainable business by ensuring the highest integrity in everything we do and every decision we make. Together, we can continue our journey and growth while remaining a trustworthy and responsible organisation.



Patric Sjöberg
President & CEO Stromma Group



“Stromma and our reputation rely on all of us to follow the letter and the spirit of our CoC.”

STROMMA BUSINESS ETHICS & CODE OF CONDUCT

Introduction

We are committed to upholding the highest ethical standards in all areas of our operations and at all destinations. We are reinforcing a culture of trust with our colleagues, customers, and other stakeholders and a basis for sustainable development, profitability, and growth. By adding value to the organisation, and the life of our colleagues and customers, we can fulfil our mission of creating:

Memories for life

Each employee is empowered to make decisions based on our values and supporting our mission. These decisions reflect on Stromma and impacts our reputation.

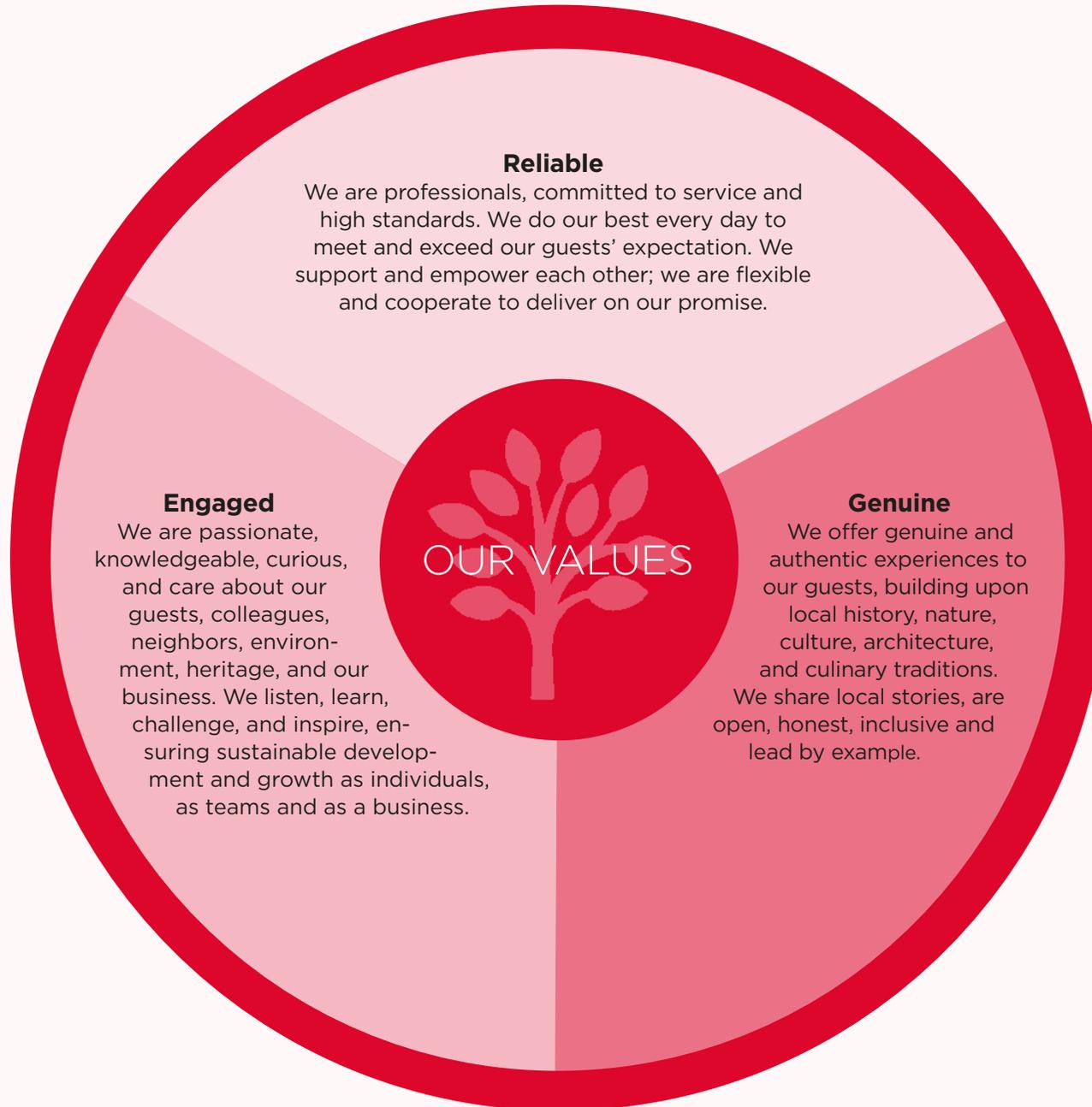
The purpose of the CoC is to set guidelines which will help each of us make the right decisions and do the right thing for our guests, colleagues, partners, society, and the environment, while ensuring compliance with applicable laws, regulations, and internal policies.

With our Code of Conduct we have aimed to provide guidelines for the most general situations and dilemmas. However, you may find yourself in situations where you are uncertain of the right decision. If so, consult with your manager, a colleague, or our Compliance officer before you make the decision.

We do appreciate that in a busy environment with many guests we may be forced to make decisions without being able to consult with anyone. If you have doubts about any decision or action in hindsight, consult with your manager.

Consulting, reflection, and reporting will help us learn and improve.

STROMMA BUSINESS ETHICS & CODE OF CONDUCT



STROMMA BUSINESS ETHICS & CODE OF CONDUCT

Speak up – ask for guidance and voice concerns

You are the key to ensuring we follow our CoC and responsibilities, and that we are accountable. Not only by being a good example, but by speaking up and seeking advice when in doubt and reporting if you witness a violation or have other concerns.

It is important you react promptly and use the channels available:

- Your direct manager
- Your local HR department or local DPO
- A member of your work council, safety council etc.
- A colleague
- A member of our management team
- Group HR (Overall responsible for Stromma

Group Whistleblower policy and procedures)

- Group CEO
- Stromma Group Whistleblower Scheme administered by PriceWaterhouseCoopers.

Reporting is essential for our accountability, for preventing and stopping any misconduct, and for learning and improving.

While we encourage transparency, and handling within the normal management system, we do appreciate not all concerns be will easy to share, and you may choose the channel which make you most comfortable.

- Ask questions or consult a colleague when in doubt.
- Speak up about concerns, misconduct, and violations.
- Use our normal channels for reporting.
- Use the whistle blower system for graver incidents or if you do not feel comfortable using internal channels.
- Listen to colleagues and handle all questions and concerns respectfully and seriously. And make sure to take action.
- Praise colleagues coming forward in good faith.

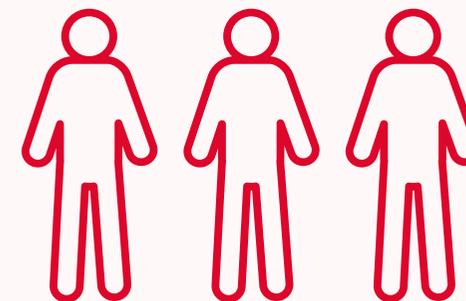
Stromma does not tolerate any retaliation against or victimization of any colleague or other persons who in good faith raises concerns, questions, or reports regarding a potential violation.

For more information, please see our Group Whistleblower policy.

Responsibility and accountability

Our CoC sets high expectations and standards for trust and integrity. It reflects our commitment to be acting in a sustainable, ethical, and compliant manner in all our activities.

- Each of us is personal responsible for supporting our values in everything we do. We are responsible for reading and following the letter as well as the spirit of our CoC, the underlying policies and procedures, applicable laws, and regulations. And to ensure we always conduct our business and ourselves in accordance with our values – **Reliable, Engaged and Genuine.**
- We encourage and support a culture where everyone feels safe to raise concerns, ask questions, and discuss dilemmas. We are honest, open and we accept it is human to make mistakes, as long as we report the mistakes, act, learn and improve.
- We address and act on all reports. We do not tolerate mishandling, inaction, or delays in response to reports and we do not condone any kind of retaliation towards colleagues who makes us aware of any breach or misconduct. Speaking up is a responsibility of all employees and stakeholders in Stromma and it is an equally important responsibility to listen, help investigations, learn, and improve.



Responsibilities ALL

- Know and follow our code of conduct and other policies.
- Ask questions when uncertain of the right decision or action.
- Support learning and open dialogue.
- Speak up when suspecting a violation.

Responsibility MANAGERS AND OWNERS

- Set high expectations and lead by example.
- Cultivate an open-door culture and a room of trust and confidence.
- Promote learning and improvement.
- Be alert to any misconduct.
- Handling of concerns and misconduct.

“ Speaking up is a responsibility of all employees and stakeholders in Stromma and it is an equally important responsibility to listen, help investigations, learn, and improve.”

OUR STANDARDS



PEOPLE, PLANET AND PROFIT

Our vision is to deliver world class experiences, and we want to do so in an ethically responsible and sustainable way.

We believe acting responsible while creating value for employees, customers, the environment, the communities we operate in, as well as for our owners, will help us succeed and benefit us commercially. It will allow us to continuously develop and to invest in initiatives improving our profitability and sustainability, supporting the wellbeing, safety and growth of our people as well as increasing our environmental and social impact.

PEOPLE AND WORKPLACE

OUR PEOPLE ARE KEY TO CREATING MEMORY FOR LIFE AND TO OUR SUCCESS

Promoting a positive, inclusive, and safe workplace as the foundation for performance and development is part of our responsibility as a company.

We treat each other with respect, we support and trust each other; we are open and honest. We collaborate, we help each other grow, and we take responsibility for a safe and healthy workplace.

PEOPLE AND WORKPLACE

Wellbeing, health, and safety

The wellbeing, health, and safety of you, your colleagues, our guests, and others contributing to or affected by our operations is our top priority.

- We are all expected to contribute to a safe and sound work environment and to reporting any hazards or threats to health and safety.
- We have established local work environment councils according to legislation.
- We collaborate with our colleagues and local authorities to ensure we meet regulations and requirements and continuously improve the work environment and working conditions for all.
- You will receive the necessary training and introduction to ensure your own health and safety at work, how to handle emergency situations, and how to keep our guests sound and safe while visiting with us and our destinations in general.
- You are expected to familiarize yourself with safety standards, escape routes, to act proactively to promote health and safety and to ensure all incidents, accidents and near misses are reported according to our policy.

For more details see your local Health and Safety Policy

Drug and alcohol free workplace

We are committed to ensuring a workplace free from alcohol, narcotics, or any other habit-forming substances, which may present a potential risk to your or others health and safety. This applies to all in Stromma as well as to our partners.

- It is the responsibility of each of us to intervene if we suspect any abuse, misuse or side effects of alcohol and drugs. We offer different measures, treatments, and support.
- As prescription drugs may also affect your performance and conduct, we expect you to consult with your manager if you take any drugs which may affect your behaviour or performance.
- We do perform alcohol and drug tests in order to promote health and safety and to enforce our policy.
- Our local management teams may grant general or specific exemptions, permitting responsible alcohol consumption in connections with company events, receptions, or other significant events as well as occasional after work events.
- Please note you are not allowed to consume alcohol when representing Stromma in public or wearing the Stromma Uniform or any other item associating you with Stromma.

For more details see your local Drug and Alcohol Policy

Human rights

It is our responsibility to promote a culture which protects human rights in our workplace, with our partners and in the communities where we operate.

- We work against any kind of discrimination and promote dignity and equality for all in our organisations, amongst our partners and in society in general.
- We respect your right to freely form and join organisations and engage in collective bargaining and we respect the agreements made with unions.
- We will ensure a healthy work – life balance, with time for family and leisure activities.
- We recognise the importance of education and support the ongoing development of our colleagues.
- We do not accept child labour.

Diversity and inclusion

We want everybody to feel welcome and as a part of Stromma.

- We believe diversity and inclusion will add to our competencies, perspectives, and ways of approaching challenges. A diverse organisation will help us to better understand the needs and wishes of our employee, guests, and other stakeholders and to address any challenges in a balanced manner. Diversity will help us to make more informed and better decisions. It will make us stronger and help us grow.
- Diversity is more than gender, race, age, and nationality. It is also more intangible aspects such as socioeconomic background, education and personal believe.
- A structured way to inclusion reflects our commitment to tolerance and equality and helps us embrace and nurture the diversity in the organisation and amongst our guests.

“ Diversity will help us to making more informed and better decisions. It will make us stronger and help us grow. ”

PEOPLE AND WORKPLACE

Equal opportunity

It is important to us that everybody is and feels treated fairly and with respect and dignity.

- We look for talent and for a variety in talent.
- We are committed to fair, unbiased, non-discriminatory, and equal treatment of all qualified persons without regards to race, ethnicity, religion, background, gender, gender identity, age, sexual orientation, any disability or other health conditions and any legally protected status.
- This applies to all aspects of your employment and to our policies including recruiting, training promotion, layoffs, discipline, salary levels and other forms of compensation.
- Our ambitions and goals related to gender equality are aligned with UN Development Goal #5.



Achieve gender equality and empower all women and girls.

STROMMA'S GOAL:

Fair balance between men and women in management

"We work towards gender equality when it comes to employment. We have increased our work against sexual harassment and discrimination."

Harassment-free workplace

Everyone should be able to perform their job without fear for harassment, bullying, discrimination, or repercussions. It is important for us to protect the integrity and wellbeing of all. Respecting personal values and beliefs of each individual and appreciating the different cultures and backgrounds in our organisation is essential for trust and wellbeing.

Harassment comes in many forms and sometime the intent is quite different from the perception of the situation and we appreciate that the diversity among our colleagues may lead to misunderstandings. Harassment may also come from ignorance and may be intentional.

We all have a responsibility to promote a harassment-free workplace and to actively act against any form of harassment and discrimination. All cases including misunderstandings should be addressed and acted on upon for the wellbeing and integrity of the individual and for the learning opportunity for the organisation.

- In order to reduce the risk of misunderstandings and any form of harassment, we include guidelines and expectations for proper conduct in our induction and training.
- Everyone can file a complaint regarding bias, unfairness, discrimination, or harassment to our compliance officer or in our speak-up channels.
- Acts of harassment and discrimination will have consequences.

Read more in our Whistleblower policy and local procedures.

Leadership

We train our leaders to be good role models. To lead according to our values, good business ethics and good conduct. We support them in their work to embrace diversity and inclusion, to engage with and develop our colleagues, and to ensure wellbeing, safety, and performance in their team and the organisation.

We support our leaders in their own development and in being able to make sustainable and ethical decisions.

We listen to our leaders and encourage them to speak up and support their colleagues in doing the same.

“ We all have a responsibility to promote a harassment-free workplace and to actively act against any form of harassment and discrimination. ”



SUSTAINABLE TOURISM

Our ambition is to make sustainability a part of everything we do and be integrated in all our business activities. We want to take the lead in the tourism industry and make sustainability a priority. We work towards reducing our use of resources, purchase and use raw materials with the best possible environmental performance whenever possible. And we will continuously measure and strive to improve our performance.

We want to be an active voice for increased knowledge on environmental issues and take part in discussions that relate to our business, the tourism industry.

PLANET, CLIMATE, AND COMMUNITY.

Our environmental work

We focus primarily on three pillars: fuel, food and our cooperation with WWF.

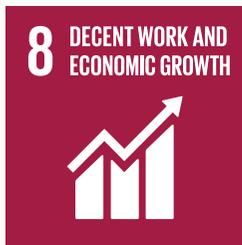
- For FUEL, we work to reduce our climate emissions by replacing fossil fuels with renewable fuels and by increased energy efficiency. This applies to fuels for our vehicles, primarily boats and buses, as well as our use of energy and electricity in our other facilities.
- For FOOD, we focus on increasing the amount of certified food and beverages in our cafés and restaurants, increasing waste recycling opportunities in harbours, on minimizing food waste and on reducing and handling the grey water discharge from the boats.
- The third pillar of our environmental work is our cooperation with WWF where we, among other, collaborate to restore the Baltic Sea and surrounding ecosystems.



“ Our ambition is to make sustainability a part of everything we do and be integrated in all our business activities. ”

UN Developing Goals

The Sustainable Development Goals have been formulated by the United Nations as a roadmap to achieve a better future for all by 2030. Although all goals are by their nature important and relevant, we here present the ones that Stromma can directly contribute to through our business. We adapt our sustainability goals based on what the business looks like in each country and destination where we are located. Below you will find the Global goals that are relevant for us.



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



Make cities and human settlements inclusive, safe, resilient and sustainable.



Ensure sustainable consumption and production patterns.



Take urgent action to combat climate change and its impacts.



Conserve and sustainably use the oceans, seas and marine resources for sustainable development.

UN Global Development Goals set direction and ambitions for our goals and initiatives related to sustainable tourism and our impact on environment and society,

HOW WE DO BUSINESS

SIGHTSEEING
TICKETS

STROMMA.COM

HOW WE DO BUSINESS

Doing business in an ethical responsible manner means we will as a minimum comply with legislation and regulations, local as well as international.

HOW WE DO BUSINESS

Antitrust

We believe free competition is good as it benefits the consumer and society in general.

- Antitrust legislation covers areas as anti-competitive agreements, such as price fixing, market, or customer sharing, and bid rigging between companies.
- We do not engage in informal talks regarding price politic, market strategy etc with competitors or in industry organisation as this may also be considered as anti-free competition actions.
- We are aware of the penalties for violation of antitrust legislations and the consequences violations may have for both company and individuals, including imprisonment and fines up to 10 % of our yearly revenue and damage to our reputation.
- Our antitrust policy and expectations are part of our introduction and training is repeated yearly.

Learn more about our expectations and regulations in our Antitrust Policy.

Bribery

Bribery and corruption are not acceptable in any way. We do not offer bribes, we do not accept bribes, and we act on suspicions or cases of bribe according to law.

- We consider any form of bribery to be dishonest, morally wrong, and unacceptable. Consequently, indirect forms of bribery such as payments that are not backed up by real deliverables and correct invoices is also considered a violation of the law.
If you for some reason will give a gift to a government or city official in any country, it must be in strict compliance with applicable anti-corruption laws and in accordance with our procedures.
- Bribery and corruptions are against the law in all of our destination, and violation is often considered a crime that can result in severe fines or imprisonment.

Conflicts of interest

A conflict of interest is when your personal interests, or the personal interest of a third party such as a relative, might influence your ability to act objectively and in the best interest of Stromma.

- You must not engage in or influence any action where you could have, or could be perceived to have, a conflict of interest.
- We expect you to disclose any conflict of interest you may have or suspect to have. Do this to your manager or to your local compliance officer.

Gifts, entertainment, travel, and donations

There is a fine line between receiving gifts and bribery. Gifts can also affect our ability to make objective decisions. It is therefore important that you always inform your manager about gifts and follow our policy.

- You must never receive a cash gift or gifts that can be exchanged to cash.
- You must only accept gifts of insignificant value – see policy for details.
- Any gift or other appreciation of significant value, from guests, suppliers, or others conducting or seeking to conduct business with Stromma must be returned immediately and reported to your manager.
- The rules apply to you and to members of your family and household.

Gifts includes entertainments such as concerts, football games, travel, meals, and donations to charities.

For more details see your local policy for gifts and entertainment.

Financial reporting

Our financial recordings comply with local and international legislation and regulation, and international best practice.

- Our data and records are basis for our decision making, strategic planning and for public reporting, and it is essential that our reporting is accurate, fair, and timely.
- We honestly report all business transactions and maintain accurate records.
- We do not knowingly make a false or misleading statement to an accountant in connection with any audit, review or examination of the Group's financial statements or the preparation or filing of any document or report for a governmental regulatory agency.

Risk Management and Response

- We are prepared for handling crises and emergencies in all part of our organization by proactive risk management and by having crises response plans in place.
- We are following changes and trends, which may affect the safety of our people or guests, the environment, society, or our business.

Taxes:

- We follow the laws and regulations in all countries where we operate.
- We abide by the letter as well as the spirit of the tax legislation locally and internationally, and we do not engage in any form of artificial or manipulated tax transactions.

PROTECTING OUR ASSETS AND REPUTATION

Company Assets

- Most of us have some company assets entrusted to us. This can be access cards, keys, codes, laptop, phones, tools, company cars, and many other items.
- It is your responsibility to keep all assets safe and only use them as intended. In general, our assets should only be used for business related purposes unless other use is specifically agreed upon.
- Keep assets safe at your workplace, during travel and at home.

Handling of records and data

- We are committed to protecting personal data and other confidential information for all of you working for us, customer, suppliers, and others we do business with.
- You must read, understand, and comply with the rules and make sure that all personal data and confidential material is obtained, processed, and stored in a safe manner and in compliance with local legislation.
- Data protections applies at all time and for all forms of data. Remember to keep data out of sight for anyone it does not concern or unauthorised persons. This applies to paper copies, mails, and data on your screen. Be especially aware of this if you are working in public places, such as trains and lounges.

For more details see our Group GDPR and privacy policy:

Communications and Social Media

- We communicate in a respectful and responsible way promoting our brand and protecting our reputation.
- When communicating externally or engaging in external activities on behalf of Stromma, we follow our internal policies and acts as ambassadors for our organization.
- We communicate and engage with stakeholders, guest and colleagues online, including on various social media. Any reference to our brands could affect our reputation, and we expect all to use social media, inside or outside work, in a responsible manner, always using common sense and professional judgement.

SUPPLIER RELATIONS



The actions of our partners and suppliers reflect on Stromma. We screen our suppliers before we engage and we trust them to make good decisions, be responsible and accountable, and to maintain high business standards.

We appreciate all suppliers may not have the same resources and knowledge as we do. By supporting and collaborating with individual suppliers about good business ethics, workplace safety, environment, and basic human rights, both organisations will benefit.

In general, we expect our suppliers to:

- Comply with regulations and law locally and where they do business.
- Provide a healthy and safe work environment for employees.
- Ensure products meet our standards and production is done in a safe way with focus on a positive impact on environment and society.
- Provide a whistle blower function for employees.
- Protect personal and confidential data according to GDPR regulations.

For key and long-term suppliers, we refer to our supplier agreement contracts.

SCOPE

Scope

Our Code of Conduct applies to all employees in all legal units in Stromma Group, including full & part time staff, seasonal staff, consultants, temporary staff, and freelancers. It also applies to contractors, partners, and board members.

We expect our suppliers and other associates to comply with same level of standards and to have their own code for ethical business conduct.

Expectations & Consequences

Doing it right – your decisions matter.

The decisions we make and actions we take should always reflect positively on Stromma and our colleagues. You may face ethical dilemmas and uncertainty about the right decision. In that case you may consult with colleagues and always consider:

- Is it legal and in line with the spirit of the law?
- Does it compromise health, safety or the wellbeing of colleagues and others?
- Does it comply with the words and spirit of our Code of Conduct and policies?
- Is it in line with our values: Reliable, Engaged, Genuine?
- How will it affect mine or Stromma's integrity and reputation?

Sometimes turning down a good business opportunity is the right decision.

Violating our Code of Conduct

All employees in Stromma Group have by the signing of their contracts agreed to act in accordance with our Code of Conduct and our values.

- Failure to comply with our Code of Conduct, legislation, and our policies may put yourself, your colleagues or our reputation at risk and will be considered a misconduct.
- Violations may result in disciplinary actions and may be reported to the authorities.

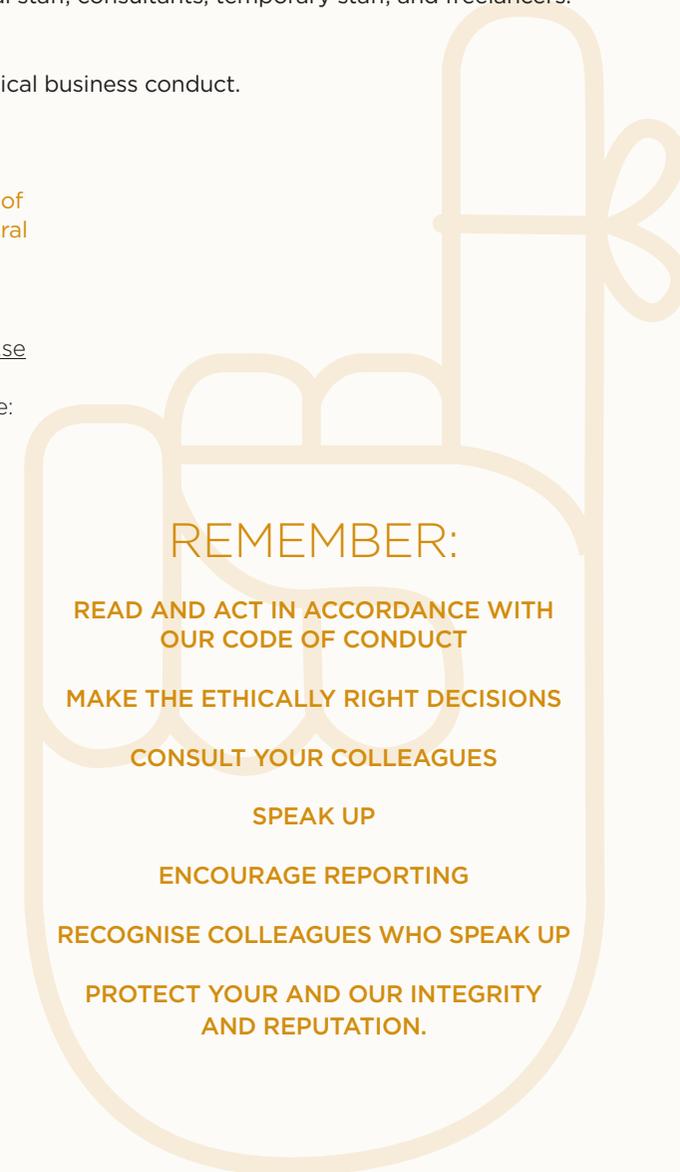
Questions and reporting:

For questions to our Code of Conduct, reporting of concerns or misconduct, please refer to our general management system or contact:

- Corporate Counsel & Group compliance officer:
Patrick Gustavsson patrick.gustavsson@stromma.se
- Group HR Manager & Whistleblower responsible:
Berit Jebjerg biebjerg@stromma.dk
- President & CEO:
Patric Sjöberg Patric.Sjoberg@stromma.se

For reports of misconduct, you may use our Whistleblower scheme:

- External Whistleblower Administrator:
PriceWaterhouseCoopers





#memories for life