



SAL Code of Conduct	
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1 GENERAL

SAL is committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. When the company addresses issues proactively and uses correct judgment, it will help set us apart from competitors.

1.1 Purpose and Scope

The purpose of this Policy is to establish a culture of openness, trust and integrity in SAL business practices. Effective ethics is a team effort involving the participation and support of every employee of the company.. This policy applies to all SAL employees, contractors, subcontractors, consultants, temporaries, and other third parties and thus all of the mentioned above should familiarize themselves with the SAL code of conduct, where applicable.

1.2 Abbreviations and Definitions

Abbreviation

HR	Human Resource Department
NDA	Non-disclosure Agreement

Definitions

SAL	SAL Heavy Lift and SAL Engineering
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1.3 Changes compared to last revision

Whole Document	SAL Heavy Lift GmbH has been transformed into SAL Heavy Lift GmbH & Co. KG.
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2 RESPONSIBILITY AND AUTHORITY

Managing Directors	Have the overall ownership of this policy.
HR	Have responsibility with reference to any disciplinary action for none compliance with this policy by employees.
Employees, third parties	Responsible to familiarize themselves with the content of policy and act accordingly.



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3 DESCRIPTION OF ACTIVITIES

3.1 Quality, Occupational Health and Safety and Environment (QHSE)

SAL Heavy Lift GmbH & Co. KG aspires to be the preferred carrier in the heavy lift shipping industry by providing our clients with an excellent quality service in every aspect of our operations, creating a safe working environment for people and minimizing our impact on the environment.

For more detailed information, please see [STD 012.01 - QHSE Policy SAL Heavy Lift GmbH and Co. KG.](#)

3.2 Confidentiality and Personal Data Protection

None of our people shall make unauthorised use of any information of a confidential nature, or reveal same to any unauthorised person, and we shall all use our best endeavours to prevent the unauthorised use, publication or disclosure of it.

We respect everyone's right to privacy and are committed to complying with data protection and privacy laws.

- **Always** contact our Contracts & Insurance department, when you have doubts regarding use or disclosure of information.
- **Always** report confidential information received in error and return it to its rightful owner.
- **Always** ensure third parties protect our confidential information by signing an NDA with them.
- **Never** leave sensitive information lying around or unsecured, or your PC unlocked.
- **Never** use unprotected technologies or methods when exchanging confidential information.
- **Never** discuss confidential information where it may be overheard.
- **Never** seek access to personal information that you are not authorised to have.
- **Never** provide personal information to anyone inside or outside of SAL without ensuring that it is appropriate and legal to do so.

3.3 Anti-corruption and Fair Competition

SAL's policy requires all transactions to be accurately reflected in the company's books and records. Falsification of books & records and the creation or maintenance of any off-the-record bank accounts is strictly prohibited.

SAL expects all employees and partners to use only legitimate practices in commercial operations and in promoting the company's position on issues before governmental authorities. "Kickbacks" or "bribes" intended to induce or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

In utilizing consultants, agents and others, whether private or public, SAL will employ only reputable, qualified individuals or firms under compensation arrangements, which are reasonable in relation to the services performed.

The provisions of this section are not intended to apply to ordinary and reasonable business entertainment or gifts not of substantial value, customary in local business relationships and not violating the law as applied in that environment.



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3.4 Fundamental Employment Rights

SAL is committed to respect the fundamental employment rights set out in international conventions of the United Nations, the International Labour Organization and the Organization for Economic Cooperation and Development. This aims at providing equal opportunities and fair treatment to all individuals on the basis of merit, without discrimination on the grounds of race, colour, religion, national origin, sex, pregnancy, age, disability, marital status, sexual orientation or any characteristics protected by applicable law.

- **Always** make sure that your decisions and actions are based on substantive information and not personal bias or preconceived ideas.
- **Always** treat people respectfully as you would want to be treated yourself.
- **Always** properly address any behaviour you think could be bullying or harassment.
- **Never** discriminate on the basis of any characteristic protected by law.
- **Never** victimise against someone because they have made a complaint of discrimination.

3.5 Prohibition of Child Labour

SAL does not hire employees under 17 years old and expects its suppliers to only employ workers with a minimum age of 15. This minimum employment age is laid down in several conventions of the International Labor Organization. If a higher minimum employment age is valid in the country in which a supplier maintains its business premises, then the supplier must adhere to it.

- **Always** verify the dates of birth and document them in the personnel files, when appointing new employees.

3.6 Conflicts of Interest

All SAL employees should act in the best interest of their company. Accordingly, the employees should have no relationship, financial or otherwise, with anyone that conflicts, or appears to conflict, with the employees' obligation to act in the best interest of SAL. Therefore, it should be our common goal to avoid situations of conflicts of interests and to create higher awareness.

- **Always** inform your superior immediately of any situation in which your personal interest or the interest of a close relation may be in conflict with the interests of SAL.
- **Never** let your relations with subcontractors or suppliers improperly influence the decisions you make for SAL.
- **Never** use SAL's name or image for personal interest. Please familiarize yourself with [STD 011.01 - SAL Communication Standard](#) to get more detailed information.



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3.7 Business Partners (Clients, Suppliers, Subcontractors)

SAL conducts its business with honesty and integrity and competes fairly and ethically within the framework of the law. SAL expects that all of its business partners have the same approach to business dealing and that they agree to comply with SAL Code of Conduct or their own equivalent code of conduct.

- **Always** act with honesty and integrity when working with business partners and make it clear that you expect the same from them.
- **Always** be alert and report to your superior any activity, or any suspicion of activity by business partners that is inconsistent with SAL Code of Conduct.
- **Never** enter into a business relationship unless you are confident that our new business partner takes its ethical responsibilities seriously.