



Compliance Policy

DSB



Department responsible: Executive Vice President, Procurement & Legal Affairs

Approved by: The Executive Team

Date: 28 October 2025

1. Introduction

Compliance is a blanket term used to describe adherence to the laws, regulations, standards and ethical rules that apply to DSB.

2. Purpose

Compliance is an essential element of DSB's corporate culture. Taking responsibility for our conduct, operating the company in an ethical and sustainable manner and in accordance with our Corporate Social Responsibility Policy, showing respect for our customers, suppliers and other stakeholders and continuing to command the confidence of the general public are key priorities for DSB.

3. Our ambition and targets

DSB's ambition and targets in terms of compliance are:

- that, at DSB, we comply with our special obligation as a public company to maintain correctness and the highest ethical standards in our day-to-day operations and the way we operate our business;
- that compliance means good conduct and serves as the natural foundation on which we operate day to day; and
- that we ask questions if we are in doubt.

4. How we achieve our ambition and/or reach our targets

We comply with the policy by:

- Ensuring that we are all familiar with our Corporate Social Responsibility Policy, know our roles and assume our share of the responsibility
- Complying with relevant legislation and the rules we have defined as important to the company when we plan, organise and perform our work
- Ensuring that compliance work, to the widest extent possible, is carried out in the relevant business areas and staff functions and thus closest to where conduct is exercised
- Increasing risk awareness by noticing compliance risks and preventing or reducing them through clear guidelines and standards
- Ensuring a trusting climate that encourages individuals to ask questions when in doubt
- Following up via built-in system controls and audit activities and preparing management reports and following up on these

4.1. Impacts, risks and opportunities

To ensure a uniform approach to compliance at DSB, DPO & Compliance is working with

- Implementation of the Compliance Policy and follow-up on policy awareness and adherence
- Implementation of our Corporate Social Responsibility Policy, in particular the section 'Our conduct' and follow-up on policy awareness and adherence
- Implementation of ongoing compliance programme (annual cycle)



- Report on progress with compliance in the other key compliance functions
- Guidance and advice across compliance functions on a uniform governance structure and clear standards for policies and guidelines
- Increased awareness of compliance risks through training and advising managers and employees on compliance
- Provision of support to the business in its compliance efforts in accordance with the company's targets, including continuous dialogue on best practice

5. Organisation, responsibility and approval

The Compliance Policy covers all employees of DSB and all wholly-owned companies.

DPO & Compliance reports significant events to DSB's Executive Board and prepares a comprehensive annual compliance report for DSB's Executive Board and Board of Directors.

DPO & Compliance is responsible for reviewing the policy.

The Executive Team of DSB has the overall responsibility for approving the policy.

The Executive Vice President, Procurement & Legal Affairs is the owner of the policy.

The policy is reviewed once annually.

6. Interaction with other policies and guidelines

- Corporate Social Responsibility Policy