

Policy for impartiality and conflict-of-interest

Who we are and what we do?

Lauritzen Fonden is a commercial foundation supporting non-profit activities. Our business activities are grouped in Lauritzen Fonden Holding, which includes the companies J. Lauritzen, DFDS and other investments. The purpose is to work for Denmark's reputation by promoting and developing Danish shipping, especially within international shipping and of Danish enterprise in general.

The Foundation's business activities and investments are thus primarily in the maritime sector and to a particular extent in independent shipping companies. The annual non-profit grants are specifically aimed at organisations and actors who work with children and young people in vulnerable positions. The Foundation thus has several contact points where the question of impartiality and conflict-of-interest can quite naturally come into play.

Which areas are covered by the question of impartiality and conflict-of-interest?

By virtue of its activities, Lauritzen Fonden can face issues of impartiality and conflict of interest in relation to the decisions that are made in both the commercial and the non-profit areas. To this, it applies that the Foundation sees it as natural that both the board, managers, and employees, by special agreement, may have more than one role. The Foundation considers that the following parties may be covered by this:

- The Foundation's board
- The Foundation's grant committee
- The Foundation's managers and employees

Procedure for handling impartiality and conflict of interest

When there are questions about impartiality and conflict of interest in relation to either the commercial area or the non-profit area, the **Foundation's board** follows a transparent process, and the issue is discussed openly. The board member has an obligation to immediately notify the board of any situation that may entail disqualification. If there is disagreement as to whether a member is impartial, the other members of the board make a decision on this. The relevant board member does not participate in the processing thereof; but can give an account of the matter.



If there is a conflict of interest for a board member, he or she leaves the board meeting during the entire consideration of the issue in question - unless the entire board invites the member to stay in the meeting. This procedure is taken to record.

In the board's rules of procedure §13, it is also stated that a board member may not participate in the consideration of questions about agreements between the Foundation and the person in question themselves or lawsuits against the person in question themselves or about agreements between the Foundation and third parties or lawsuits against third parties, if the person in question has a significant interest that may conflict with the Foundation's interest.

For the Lauritzen Fonden's **Grant Committee**, the same rules and procedure apply – this only covers the non-profit area. If a member of the grant committee has been declared impartial, this is noted as part of the recommendation to the board. For the Foundation's **Family Committee**, it applies that a member is ineligible, if there is a matter under consideration involving an application where they are a direct ascendant or descendant relative. If this is the case, the member leaves the room during discussion and decision-making.

For managers and employees, the same rules and procedure apply - including special attention in relation to the Foundation's grant recipients - and applicants, where particular emphasis is placed on objective treatment. In connection with purchase of services and benefits over DKK 50,000, the procedure is to always obtain up to three offers, unless otherwise agreed with the immediate manager and the management.

Lauritzen Fonden's guidelines for impartiality and conflict-of-interest

- If you declare yourself or have been declared impartial in relation to a specific case, you cannot participate in the consideration of the case or decision thereof.
- If there is doubt about a person's partiality in a given situation, it is the chairman of the board or the grant committee - or in his absence one of the two members of the Foundation's management, who decides whether the potential conflict of interest leads to disqualification.

A person is impartial:

1. when the person has a financial or personal interest in the outcome of a decision
2. when the person has a familial relationship with an organization or applicant



The individual is responsible for declaring his or her own impartiality at any time – if this does not happen, it is the responsibility of the management and/or the board of directors to raise a flag if they are aware of the individual's impartiality.

Who is responsible for the policy?

The board of directors is responsible for drawing up and approving the foundation's conflict-of-interest policy. On a day-to-day basis, it is the foundation's management that is responsible for implementing and complying with the policy, including ensuring appropriate training and updating knowledge about the conflict-of-interest guidelines for the foundation's employees.

This policy was approved by Lauritzen Fonden's board at a board meeting on Wednesday 10 April 2024. Going forward, the policy will form part of the board's annual schedu

