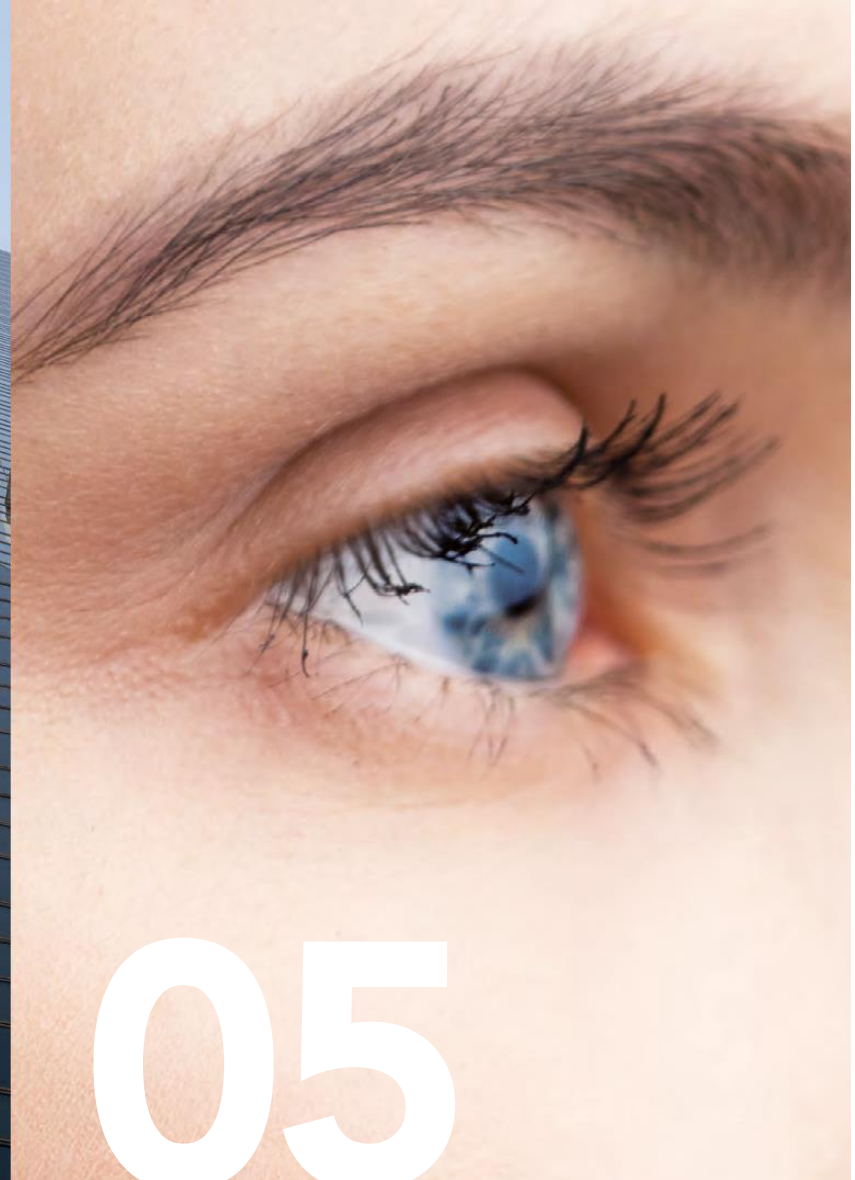
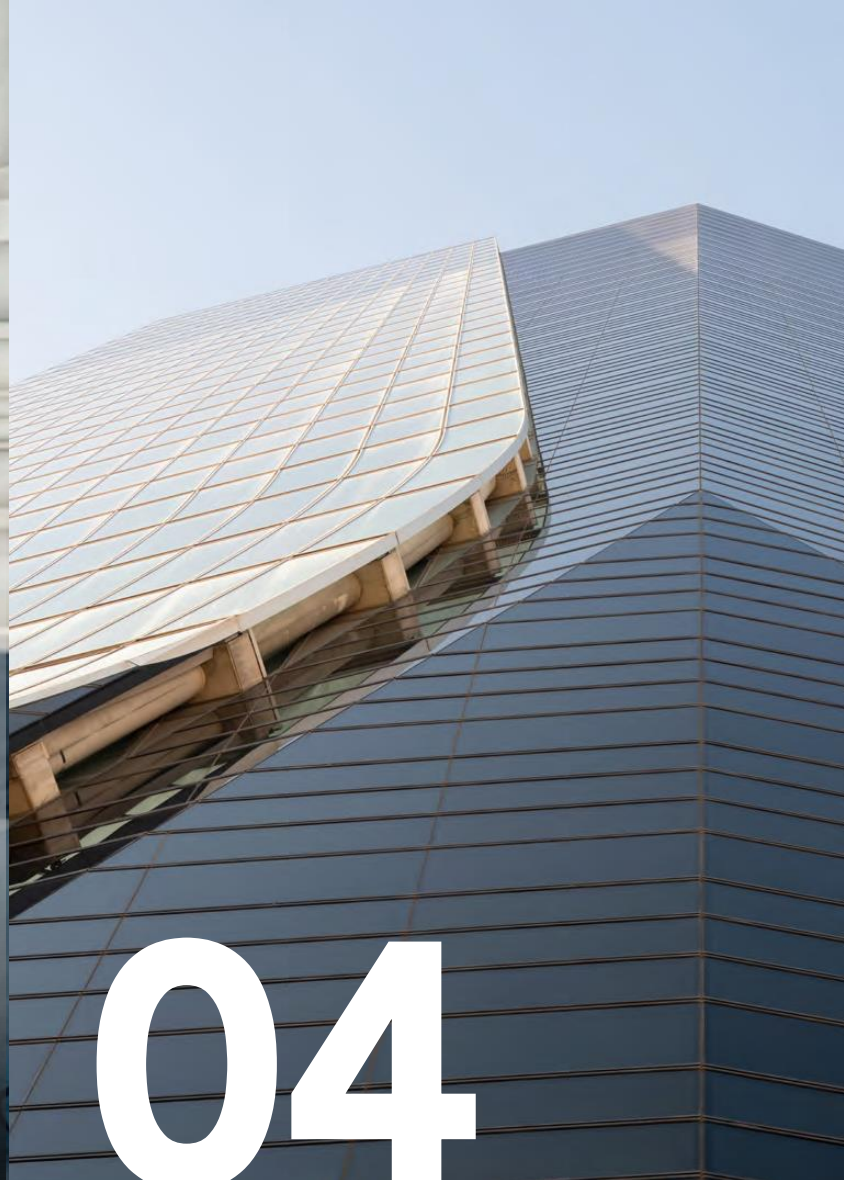


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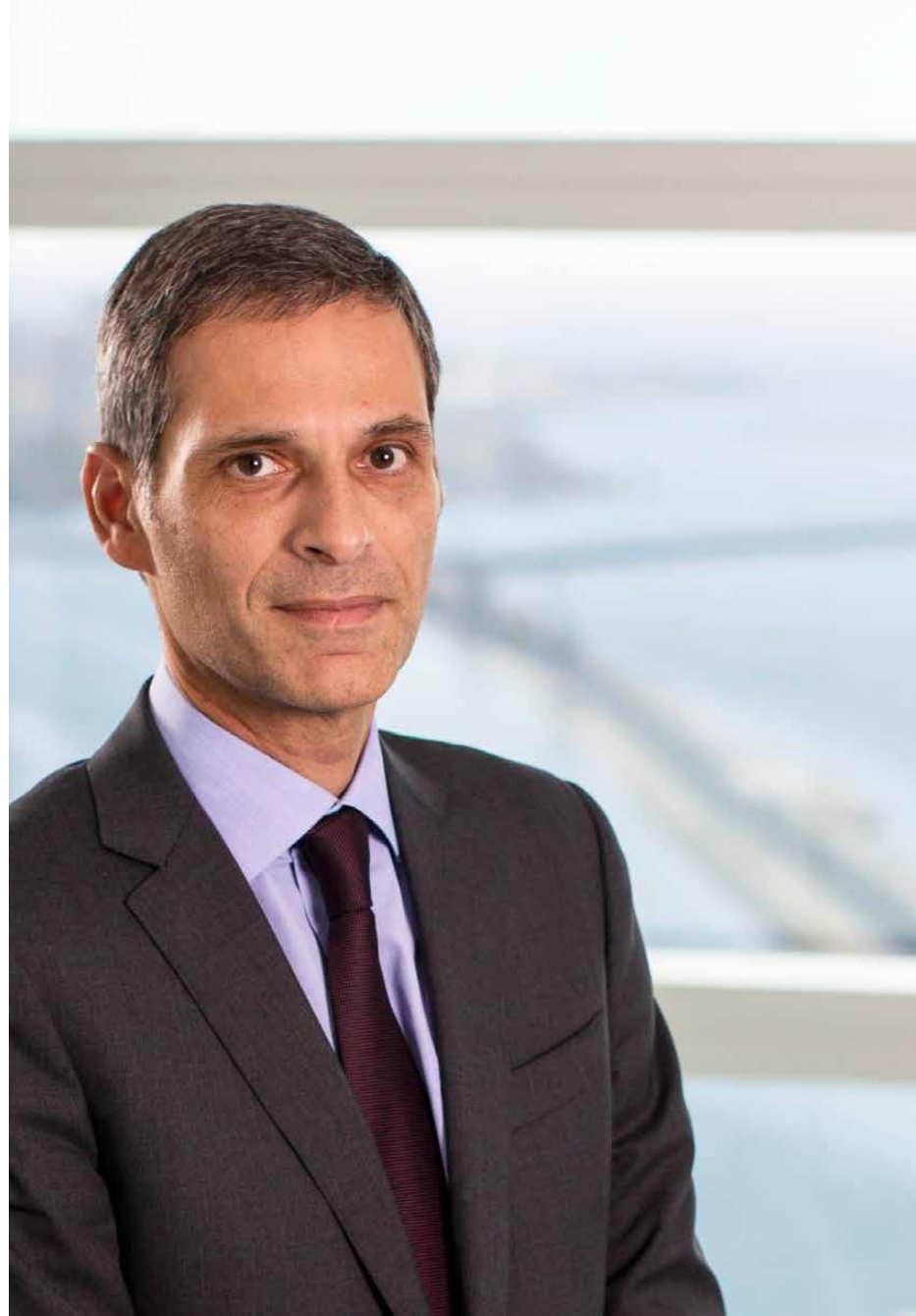
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Rodolphe Saadé

Chairman & Chief Executive
Officer of CMA CGM Group

MESSAGE FROM THE CHAIRMAN

The CMA CGM Group, a leader in maritime transport, logistics, and media, has built itself on strong human, family, and entrepreneurial values: excellence, exemplarity, imagination, boldness, and integrity. Since 1978, these values have guided our decisions and actions.

Our clients, partners, and society at large expect us to live up to these values. This requirement is part of the long-term vision I have for our Group.

I wanted our ethical and deontological rules to be compiled in a clear and accessible Code, so that everyone can apply them concretely in their professional daily life. We have updated it to adapt to current challenges, particularly those related to new technologies and environmental protection.

I invite you to familiarize yourself with this Code and to apply it. Together, let's ensure that the CMA CGM Group is recognized not only for its expertise and operational performance but also for its ethical and sustainable commitment.

**I am counting on you,
and you can count on me.**

CODE OF ETHICS

To ensure CMA CGM Group’s continued success, each of us, working together, must continue to follow all applicable international and national laws and regulations and pursue the highest standards of business ethics and integrity in everything we do.

Our Code of Ethics is informed by our four values of Excellence, Exemplarity, Imagination and Boldness that guide all our actions.

Guided by international standards and the principles of the UN Global Compact, we have set out in this Code of Ethics our common ethical principles with respect to environment, integrity, respect for human rights and other areas. It also gives guidance to the employees on the applicable internal policies and procedures to refer to for more details. Every employee must ensure compliance with this Code of Ethics in their daily activities.

This Code of Ethics is available on [our corporate website](#) and intranet.



A common ground

This Code of Ethics applies to all CMA CGM legal entities within the “CMA CGM Group” (or “Group”)¹.

This Code of Ethics applies to everyone working for the Group regardless of status, type of contract or location (“employees”)².



The Group also expects all “Business Partners”³ to comply with the [CMA CGM Third Party Code of Conduct](#) or to demonstrate they have their own equivalent rules of business.

¹It equally applies to partnerships, joint-ventures and other entities, directly or indirectly, effectively controlled by CMA CGM.

² It includes officers, directors, senior managers and other employees on permanent, fixed-term or temporary contracts, both directly and indirectly contracted.

³ This means all individuals or organisations dealing with the Group, including but not limited to suppliers, subcontractors, intermediaries, resellers, channel partners, advisers, customers and joint venture partners.

OUR GUIDING PRINCIPLES

The Group makes every effort to operate in accordance with the values and principles in this Code of Ethics.





RESPECTING PEOPLE

The Group is committed to being an exemplary corporate citizen and takes its responsibility for human rights very seriously. We believe that this is not only a moral commitment but also essential to building **a sustainable business**, and, ultimately, **a sustainable world**.

SAFEGUARDING HUMAN RIGHTS

We place great importance on respecting dignity and fairness and protecting the most vulnerable from abusive working conditions, including child labour, forced labour or any other inappropriate working conditions. We also care for the right of our employees to form associations and recognize their right to collective bargaining.

As part of this, we strive to eliminate any actual and potential adverse human rights impacts from our own operations and value chain. We expect our suppliers, subsidiaries and customers to act in the same way when it comes to respecting all human rights, and we monitor and evaluate our supply chain to this end.

HAVE ANY QUESTIONS OR CONCERNS?

 Contact your manager or the Human rights team at ho.humanrights@cma-cgm.com, or use the [on-line Ethics & Compliance Helpline](#).

Our approach includes:



Creating a supportive work environment

- supportive of workers receiving adequate wages and benefits, which should be, at least, in compliance with the minimum provided by law. Methods deployed for advancing this in the Group include remuneration surveys and living wage studies,
- ensuring that working hours are, at a minimum, in compliance with all applicable laws and aiming to ensure that they are reasonable in duration by deploying tools and surveys,
- recognizing and facilitating the right of workers to participate in or establish trade unions or other collective representation to advance their rights;



Protecting local environments and communities

- striving to ensure that our activities do not harm local environments and local communities' rights to health, food, water, etc.⁴,
- seeking to adequately inform, consult and involve local communities and indigenous groups whose land is used or otherwise affected by our operations;



Being a good corporate citizen

- condemning modern slavery in all its forms⁵,
- not tolerating violations by security personnel of the human rights of employees or third parties,
- protecting the privacy and data of our employees, Business Partners and other stakeholders.

In practice

You have been informed that one of our suppliers is violating labour law by tolerating working hours beyond legal maximums and paying some employees below the minimum wage.

 You should immediately inform your manager or submit a report through the [on-line Ethics & Compliance Helpline](#) or your local one. The Group will take the necessary measures, including investigating the situation and possibly terminating business relations with the concerned supplier.



Human rights policy

⁴ This includes impacts on water access or quality, soil quality, biodiversity, air quality, the livelihoods of local communities or wildlife habitats.
⁵ This includes the use of forced or involuntary labour, human trafficking and the use of child labour.

PROMOTING DIVERSITY AND INCLUSION

Diversity is a source of success. We foster an environment where each employee’s strengths and skills are valued. We strive to embed diversity, equity and inclusion in our organization.

We treat everyone with **dignity and respect** and expect all employees to do the same. **We expressly reject discrimination and all forms of workplace harassment or violence**, including but not limited to workplace bullying, threatening and intimidating behavior. Serious proven misconduct can have disciplinary, civil, or criminal consequences for the employees concerned.

To this end, our approach includes:



prohibiting discriminatory treatment or comments based on:

- national or social origin,
- language,
- race,
- gender,
- sexual orientation,
- age,
- religion, political or other protected opinion,
- disability or similar status;



promoting gender equality in the workplace;



including diversity consideration in HR processes such as hiring or promoting;



deploying leadership programs that respect diversity, equity and inclusion;



providing trainings to our employees on **diversity, inclusion and against harassment**;



taking appropriate measures in all proven cases of workplace harassment and violence⁶.

In practice

You hear some colleagues making inappropriate comments about another colleague on account of his/her gender, age or skin colour.



Either speak up to your manager or human resources contact or directly report the situation through the Ethics & Compliance Helpline or your local reporting system.



Human rights policy

HAVE ANY QUESTIONS OR CONCERNS?

Contact your manager or the Human rights team at ho.humanrights@cma-cgm.com, or use the [on-line Ethics & Compliance Helpline](#).

⁶ This includes physical violence, sexual harassment, verbal abuse, bullying or any other behaviour that can result in physical, psychological or economic harm for victims.

ENSURING HEALTH SAFETY AND SECURITY

We strive to provide a safe, secure and healthy workplace, regardless of the location. We all have a role to play, and we share responsibility for our own health safety and the safety of our colleagues.

Our culture of safety and security excellence and our **rule Work Safe and Go Home Safe** enable us to reach our objectives.

Our **Health Safety Vision** aims at **zero accidents**. This vision is spread and supported at all hierarchical levels and relevant operational areas.

The health safety and security of all our employees is not just a goal. It is one of our core values. This commitment is evident in **all aspects of our operations**. It includes our fleet design and maintenance, the identification and remediation of any illicit activities, and the protection of our employees, assets, and activities worldwide.

Our goal is to create a **culture where everyone feels responsible for their own health safety and the safety of their colleagues**, rather than just following rules and regulations.

HAVE ANY QUESTIONS OR CONCERNS?

➤ Contact your manager or e-mail security@cma-cgm.com or your safety branch representative.

As part of our health safety and security culture, we:

-  apply [international standards and codes](#), all **relevant regulations and best practices** related to ground, maritime, and air safety and security issues, which have been incorporated into internal prevention plans and procedures;
-  **encourage employees to inform management of any potential danger to the health safety of persons and property** in the course of their work, including during industrial operations;
-  provide regular trainings for employees, covering a wide range of safety and security topics;
-  **maintain appropriate protective measures to ensure the health safety and security of persons and property;**
-  **prohibit the presence of any unauthorised weapons in the workplace and the consumption of alcohol, illicit drugs and any other illegal substances**, in violation of national, international or local regulations;
-  foster a **culture of continuous improvement** by regularly updating our policies and procedures and by sharing best practices amongst divisions to reflect the latest industry standards.

To this end, each employee must comply with the internal guidelines and preventive rules issued to them.

In practice

You notice that an electrical device, such as a printer or coffee machine, is malfunctioning. It overheats and emits a burning smell.

-  You should unplug the device (if it can be done safely) to prevent any risk of fire or danger and immediately inform the appropriate service (general services, maintenance, or internal safety) by providing details about the malfunction.



RESPECTING **THE ENVIRONMENT**

As a global player in sea, land, air and logistics solutions, we place the protection of the environment at the heart of our Group's corporate strategy, while also providing sustainable services.



LIMITING YOUR ENVIRONMENTAL IMPACT

As part of our sustainability commitment, we act daily to limit the carbon footprint of our operations and to contribute to preserving global biodiversity (marine and land).

 Combating climate change

We are committed to accelerating the decarbonization of our operations.

This is accomplished by:

- monitoring and reducing our **greenhouse gas** (GHG) emissions;
- implementing **energy efficient solutions** across our value chain;
- optimising our assets;
- promoting the use of **alternative fuels**, renewable energy and innovative technologies to **improve air quality**.

In line with our commitment to reach Net Zero Carbon by 2050 across all its activities, CMA CGM has set two intermediary milestones for its shipping activities (in line with the upper trajectory of the International Maritime Organization): -30% of greenhouse gas emissions by 2030 and -80% by 2040 (reference: 2008).

HAVE ANY QUESTIONS OR CONCERNS?

 Email ho.csr@cma-cgm.com or submit a report through the [on-line Ethics & Compliance Helpline](#).

 Preserving land and marine biodiversity

As climate and quality of ecosystems are interlinked, we act to limit the impact of our operations on biodiversity.

Our aim is to:

- restore fragile natural spaces;
- contribute to soil, water and ocean quality;
- halt deforestation;
- limit noise emissions and other damage at sea or a shore;
- minimise **the risk of pollution** through the responsible management of chemicals and emergency management processes to prevent accidental discharges in soil, air or water bodies as well as loss of containers at sea;
- limit the impact of maritime transport on local biodiversity through the transport of invasive species;
- combat illicit trafficking of endangered species and ensuring animal welfare during transportation.

In practice

-  If you witness or are informed of any environmental incident or pollution, please report it immediately and follow appropriate processes for remediation.
-  If any reasonable doubt exists about illegal wildlife trade, perform due diligence actions to assess the risk and report to the head office.
-  If you encounter a whale during your maritime voyage, keep a safe distance and optimize the route.



PROMOTING SUSTAINABLE RESOURCE MANAGEMENT AND INNOVATIVE ECO-FRIENDLY SERVICES

Sustainability is more than a goal, it’s an on-going commitment. We’re continuously innovating and taking action to build a better tomorrow.

Promoting a circular economy

The careful and efficient use of resources is an integral part of the Group’s strategy.

Sustainable resource management is achieved by:

- implementing waste reduction programs;
- taking **recycling initiatives**;
- preserving **water quality and resources** by collectively reducing and managing consumption and maximising resource across operations.

Developing innovative eco-friendly services and solutions to support our stakeholders’ efforts

Employees globally are tasked with implementing these environmental priorities in the course of their duties.

The Group is committed to operating in compliance with relevant international, national and local environmental regulations.

In all our activities, innovative services are proposed to our customers to minimize environmental impacts, such as alternative fuels for ships, planes or trucks, low carbon ground transport options or estimation of the CO₂ footprint of transport options to integrate climate in supply chain decision making.

In practice

-  Reduce energy and water use and waste production.
-  Share and implement with your team any ideas that can contribute to energy savings, reduction in resources use (water, materials) in your daily activities or increase of resource usage efficiency.

HAVE ANY QUESTIONS OR CONCERNS?

 Contact your local CSR representative or email ho.csr-ambassador@cma-cgm.com.



DEVELOPING A COLLECTIVE CULTURE OF ENVIRONMENTAL AWARENESS

We strive to raise environmental awareness through i) staff training and empowerment and ii) the promotion of environmental knowledge, skills and practices.

Employees have access to dedicated on-line and on-site programmes covering general knowledge on climate change and biodiversity as well as the impact of the Group’s environmental transition on their work.

All employees are required to reduce the environmental impact of their activities. Continuous improvement is at the core of our strategy to improve our environmental performance.

All employees are encouraged to identify new ‘eco-friendly’ initiatives that might advance the principles of sustainable development in practice.

In particular, communities of [CSR ambassadors](#) have been established worldwide to bring together employees and share best environmental practices.

Finally, in all countries where the Group has an office, the local CSR representative works to raise environmental awareness among employees and local communities. This is done with the support of local colleagues and/or CSR ambassadors and the involvement of local players.

In practice

- ✓ Take all appropriate training sessions to increase awareness of environmental issues and challenges.
- ✓ Follow the news on CSR initiatives organized locally and take part.
- ✓ Look for eco-friendly initiatives in your own area of responsibility and share your ideas with your local CSR representative.

HAVE ANY QUESTIONS OR CONCERNS?

↳ Contact your local CSR representative or email ho.csr-ambassador@cma-cgm.com.



UPHOLDING **INTEGRITY IN THE BUSINESS**

As part of our culture, we strive to be exemplary. We follow applicable laws, and we are committed to act with integrity. Our partners can have trust in us.

FIGHTING CORRUPTION AND INFLUENCE PEDDLING

We have a zero-tolerance policy towards corruption. Corruption is illegal, incompatible with our values and highly damaging to our reputation and image.

Corruption is the act of offering or accepting an undue advantage (money, gift, invitation, favour) in exchange for a favourable decision or act from an individual, company or public official. It can be done directly or indirectly through a third party.

Corruption can be **active**, when you are on the giving side of the advantage, or **passive**, when you are on the receiving side.

Influence peddling is when a person requests or accepts any benefit to effect influence on a public agent to obtain some favourable decision.

We always refuse to give, promise or accept anything that could be considered corruption. Failure to comply with anticorruption regulations and internal rules may lead to heavy civil and criminal penalties for the Group and the concerned employees, as well as disciplinary sanctions.

HAVE ANY QUESTIONS OR CONCERNS?

↳ Contact your manager or your local compliance representative, or use the [on-line Ethics & Compliance Helpline](#).



Gifts and hospitality

We recognize that gifts and hospitality can be used to maintain business relationships. However, they can never be offered or accepted with the intent -or appearance- to improperly influence someone’s action or decision. This could potentially be seen as corruption.

Gifts and hospitality should only be offered or received when **appropriate, reasonable and in line with internal rules** and regulations.

Extra caution should be applied when public officials are involved. Contact your compliance officer to get guidance.



Facilitation payments

A facilitation payment is any payment (in cash or with goods) typically made to ensure or expedite some routine administrative action that you are already entitled to. For example, a facilitation payment could be made in connection with the processing of governmental papers or attempting to obtain priority treatment.

Such payments are strictly prohibited under Group policy.



Sponsorships and donations

Donations can only be made without expecting a return service by the recipient.

Sponsorships can only be granted on the basis of a **contractually agreed return service** for social objectives or to achieve a positive impact in terms of our reputation.

Prior to committing the Group to a donation or the sponsorship of an event or organisation, prior written approval from the Group’s Corporate Communication Department must be obtained⁷.



Lobbying

As an international group, we must **play a role in the public debate**. We should clearly express and share our positions. Lobbying may present risks of corruption. We must act with **integrity in all our lobbying actions** involving public decisions and public officials and follow applicable laws and internal rules.

⁷ Corporate Communication Department at ho.communicationcorporate@cma-cgm.com.

In practice

During a call for tenders, a participating supplier offers you a gift of value that could affect the impartiality of the selection process.



You should immediately report the situation to your manager and submit a report on the Ethics & Compliance Helpline or your local reporting system. The company will take necessary measures, including terminating business relations with the supplier.



[Anticorruption code](#)



NURTURING RESPECT WITH OUR PARTNERS

The Group’s success is dependent on its Business Partners. It is CMA CGM’s policy to ensure that the Group’s Business Partners meet the same standards of ethical and legal compliance as the Group itself.

Business Partners are any third-parties that we engage with and act for us. They can be suppliers, sub-contractors, customers, agents, consultants, advisors, investors, etc.

We are responsible for what they do on our behalf. We are prohibited from using them to give or accept bribes or facilitation payments. We should only engage with third parties when there is a legitimate business need, and we have checked their integrity.

We must ensure continuous monitoring of our relations with our Business Partners, as well as their integrity and their environmental and human rights performance.

 Respect for customers

The spirit of service embodied in the Group’s values obliges the Group to strive for excellence in its business practices with customers.

This excellence is the basis of long-term customer relationships.
All commercial relationships must comply with the legal and ethical framework in this Code. In all dealings with customers, employees must be aware that they represent the Group. They must, therefore, treat customers with the utmost **respect** and in a professional, ethical and **legally compliant** manner.

In practice

-  If you are required to work with an individual or a vendor who will be authorized to represent your company, always make sure that you first evaluate the risks of this relationship and carefully define and manage the missions assigned.

HAVE ANY QUESTIONS OR CONCERNS?

-  Contact your local legal or compliance representative.



COMPLYING WITH THE RULES OF INTERNATIONAL TRADE

We strive to preserve and foster a fair and sound economy. We comply with competition and trade regulations in every country in which we operate.

Complying with competition laws

We are committed to refrain from any behavior that violates or may be perceived as violating competition and antitrust laws or regulations.

In particular, all employees are strictly prohibited from entering into any agreements with competitors designed to:

- fix any element of pricing (rates, discounts, surcharges, etc.);
- improperly restrict or affect capacity;
- share or split markets or customers, including bid rigging;
- limit innovation.

Sharing of sensitive commercial information

We must not share sensitive commercial information with competitors.

We must seek guidance from the legal & compliance counsels before engaging in discussions and/or entering into a cooperation agreement.

Prominent market position

Whenever the Group holds a prominent market position, we must exercise caution and refrain from any abusive practice that may prevent or limit effective market competition. Examples include discrimination, predatory pricing, or refusal of access to infrastructures.

Respecting economic sanctions and export control

Economic sanctions are governmental measures to prevent or limit trade with a targeted country, business group or individual. Such sanctions may include embargoes, asset freezes, export restrictions, etc.

We are committed to comply with economic sanctions, embargoes and export control regulations.

To this end:

- we must follow the applicable internal rules and procedures;
- we should seek guidance from the Group’s dedicated team to ensure we do not do business with sanctioned entities or persons and do not conduct any prohibited transactions under trade sanctions.

Contributing to the protection of endangered species

We condemn illegal wildlife trade. We will not knowingly facilitate or tolerate the carriage of illegal endangered species of wildlife fauna and flora. We work with local law enforcement agencies and recognised NGOs to identify risky situations.

In practice

You participate in a trade association meeting and one of your competitors shares commercially sensitive information.

-
- You must immediately leave the meeting and ask your exit to be recorded in the minutes of the meeting.

HAVE ANY QUESTIONS OR CONCERNS?

Contact your local legal or compliance representative or email:

- ↳ the Economic Sanctions team at ho.economic-sanctions@cma-cgm.com;
- ↳ the Competition Compliance team at ho.competition@cma-cgm.com.



[Global trade compliance policy](#)



[Competition compliance guide](#)



MANAGING TAX RESPONSIBLY

We consider that responsible tax management plays a crucial role in upholding corporate integrity and compliance.

Ensuring **transparent and fair tax practices** involves adhering to local and international tax regulations and contributing fairly to the economies in which the company operates.

By implementing robust tax policies, the company not only mitigates legal risks but also demonstrates its **commitment to social responsibility** and ethical conduct.

This approach fosters **trust among stakeholders**, enhances the **company’s reputation**, and supports **sustainable business** practices. It ensures that tax contributions align with our values and the communities we serve.

To this end, we:

- conduct all financial and tax-related activities with **transparency and integrity**;
- must comply with internal policies and develop appropriate methods to ensure accurate reporting of financial information and comply with local and international tax regulations;
- stay **informed** about the company’s tax policies; and
- participate in **relevant training sessions** to understand our role in maintaining compliance.

By fostering a culture of **ethical behavior and reporting any concerns or irregularities** to the appropriate channels, employees uphold the company’s **commitment to responsible tax** management and **support its reputation** for corporate integrity.

In practice

You suspect a potential deficiency in our tax reporting system that may lead to local tax law violation.

- You should immediately inform your manager of your concerns and submit a report on the Ethics & Compliance Helpline or your local reporting system.

HAVE ANY QUESTIONS OR CONCERNS?

- ↳ Contact your manager or your local compliance representative, or use the [on-line Ethics & Compliance Helpline](#).



FIGHTING MONEY LAUNDERING

We strive to prevent and detect any suspicious activity that could be related to money laundering or terrorism financing.

To this end, we have implemented **internal policies** to ensure the **transparency of our transactions** and compliance with industry best practices and foster a culture of vigilance and accountability across the organization.

To ensure that our activities are not misused for money laundering purposes, we:

-  implement and regularly update background checks procedures;
-  monitor transactions for suspicious activities; and
-  report any concerns.

We are strictly prohibited from concealing or engaging in suspicious or illegal financial transactions, including those potentially perceived as money laundering. **We cooperate with authorities and enforce strict consequences for non-compliance.**

In practice

When onboarding a new business partner (for example a client or supplier), the nature of the activities and sources of revenues appear unclear or the persons involved in the business appear to have an unclear function.

-  You should immediately inform your manager and submit a report on the Ethics & Compliance Helpline or your local reporting system.

HAVE ANY QUESTIONS OR CONCERNS?

- ↳ Contact your manager or your local compliance representative, or use the [on-line Ethics & Compliance Helpline](#).



MANAGING DATA WITH ETHICS

The Group is committed to bringing innovative solutions and promoting the use of new technologies. While doing so, we attach great importance to respecting people’s right to privacy and protection of their personal data by making responsible use of new technologies.



Promoting responsible use of technology

Digital innovations are key to **enhancing agility, optimizing costs, and supporting our energy transition**. We aim to improve our customers’ and employees’ user experience, to make it simpler and more efficient. At the heart of our innovation strategy is a dedicated ecosystem.

CMA CGM’s **Innovation Committee** drives and structures digital projects. Through our start- up incubator, ZEBOX, we support the growth of companies specializing in cutting edge fields like **AI, robotics, cybersecurity, blockchain**, augmented reality, and the Internet of Things.

The Group promotes a **sustainable digital innovation strategy**.

To this end, our approach includes:

- staying **vigilant about the secondary purposes** of tools⁸ which can have an impact on users’ rights and freedoms;
- **preventing** bias when using AI by testing the models we use;
- **ensuring transparency** in our use of technology, particularly in AI-driven decisions; and
- anonymising data.

Together, we can drive innovation that not only meets business needs but also **respects and protects the rights** of all stakeholders.



Protecting data privacy

We are committed to use personal data in **compliance with global privacy laws and regulations**.

We treat with care any information that identifies an individual. Examples include bank account details, age, resume and hiring decisions.

In particular, we must only collect, use and share personal data that is relevant to a legitimate business purpose and, on a need-to-know basis, delete any data that is no longer needed.

HAVE ANY QUESTIONS OR CONCERNS?

↘ Email the Group Data Protection Officer at ho.dpo@cma-cgm.com or contact your local data protection representative.

In practice

- ✓ We must follow the data privacy internal rules to ensure the protection and confidentiality of personal information entrusted to us by our colleagues, business partners and other stakeholders.
- ✓ We must notify any security breaches related to personal data.
- ✓ We must include privacy by design as a part of the new projects.



[Data privacy policy](#)

⁸ Such as improving the performance of tools, improving the experience, etc. This can be based on the analysis of users’ data, their behaviour, and personal data.



RESPECTING **THE COMPANY AND THE WORKPLACE**

Protecting the Group and its tangible and intangible assets is a shared responsibility. Every employee plays a critical role in preserving the assets of the Group, including its image and reputation.



AVOIDING CONFLICTS OF INTEREST

A conflict of interest may occur when we have a financial or personal interest or activity that interferes or appears to interfere with the Group’s interests.

Links of interests are not necessarily an issue. We must avoid doing anything that might rise to a conflict of interest or the impression of a possible conflict of interest regarding our personal interests.

The interference must be sufficiently significant to influence or appear to influence the employee.

Examples of potential conflict of interests include hiring friends or family as new employees or business partners, running a private business on the side or being in a romantic relationship with a colleague or supervisor that could affect professional judgment.

Having a conflict of interest does not necessarily mean that the activity at issue must be avoided or discontinued. All conflicts of interest must be disclosed to our management. It helps to resolve or manage the issue and also protect us as employees and the group from fines, reputational damage, legal risks, disciplinary sanctions and loss of trust.

In practice

In charge of some procurement missions, you negotiate and select suppliers for a company of the Group. Your sister has recently become the Head of Sales at a company that is currently bidding for a contract with the Group.

 To mitigate a conflict of interest, you must inform your manager about your relationship and recuse yourself from the vendor evaluation process, allowing an unbiased team to make the decision.



[Conflict of interest policy](#)

HAVE ANY QUESTIONS OR CONCERNS?

↳ Contact your local legal or compliance representative or email ho.ethics@cma-cgm.com.



COMBATING FRAUD

We have a zero-tolerance policy for any type of fraud. It is incompatible with our values and highly damaging to the Group’s reputation and image.

Fraud committed by one or more individuals or legal entities, within or outside CMA CGM Group, consists of an intentional act of deceit towards a third party or an entity within CMA CGM Group **to gain an unfair or undue advantage**⁹. It can take **many forms** including theft, misappropriation of assets and the falsification of records.

Fraud may be committed for a person’s own or a third party’s benefit resulting from a breach of CMA CGM Group’s rules or a violation of international or national applicable law, in particular tax, customs and accounting.

Fraud not only **deprives the company of resources**, but it can also damage our reputation, get us involved in **lengthy and expensive investigations and harm the people**, organizations and governments that the Group interacts with.

We are committed to handling the assets that have been put in our trust, with great care. **We must absolutely refrain from engaging or participating in, directly or indirectly, any act or attempt that constitutes fraud or attempted fraud.**

Any failure by an employee to comply with CMA CGM Group’s rules and applicable regulations may result in disciplinary action as well as possible criminal and civil proceedings.

In practice

If you suspect a fraudulent act or behaviour, you should Immediately inform your manager and submit a report on the on the Ethics & Compliance Helpline or your local reporting system.

HAVE ANY QUESTIONS OR CONCERNS?

↳

Contact your manager or email the Fraud Prevention Department at ho.fraud@cma-cgm.com.

⁹ Funds, assets, or any other type of benefit in whatever form.

SAFEGUARDING THE GROUP'S ASSETS

We must respect and protect the assets of the Group. We respect both tangible and intangible assets: workplace, equipment, intellectual property, and confidential information.



Protecting confidential information

We are subject to a **strict obligation of confidentiality** regarding information obtained in the course of our duties or in our work environment.

Any information whatsoever that is not available to the public, because it has not been released in an official statement or is not available on the company or the Group's website, must be considered confidential.

Should we have any doubts as to whether information is confidential, we should consult our manager. Once information is deemed confidential, we should take all reasonable steps to safeguard its confidentiality and prevent its disclosure.

We must comply with the principles set out in the Group's ["IT user charter"](#).



Safeguarding Intellectual property

Safeguarding intellectual property is vital to our innovation and competitive edge. Employees must protect company intellectual property, including confidential data, patents, trademarks, and trade secrets, while respecting the intellectual property rights of others. Unauthorized use, duplication, or distribution is prohibited. Compliance with intellectual property laws is mandatory, and employees must obtain validations when using third-party intellectual property.



Ensuring cyber security

In today's hyper-connected world, **protecting our digital assets** and our client data is a top priority. We strive to **contribute to a more secure digital environment**.

The Group has defined a cyber security strategy that embeds:

- protecting our employees, assets, network and data from cyber-attacks with dedicated experts;
- supporting a sustainable digital future;
- ensuring the cyber resilience of the Group's business capacities; and
- avoiding reputational damage.

In practice

- 

If you suspect that a third-party copies our Group's products, names or logos or infringes upon any other intellectual property rights of the Group, immediately inform your local Legal representative.
- 

If you suspect that a third-party poses a threat to our cyber security protection, inform your local manager.



[IT user charter](#)

HAVE ANY QUESTIONS OR CONCERNS?

↳ Contact your local legal representative or cyber security representative.



COMMUNICATING CLEARLY AND RESPECTFULLY

CMA CGM attaches great importance to communicating clearly and respectfully in order to maintain its reputation and the confidence of customers, investors and other stakeholders.

Communicating on behalf of the company or the Group

Any requests for public statements on behalf of our company should be referred to the Corporate Communication Department. We should make clear that our comments made at public, trade or cultural events or on the internet¹⁰ are voicing solely our own personal opinion.

Be mindful that sensitive information and business secrets pertaining to our company must remain confidential.

HAVE ANY QUESTIONS OR CONCERNS?

↳ Contact your Communication local representative or email the Corporate Communications Department at ho.communicationcorporate@cma-cgm.com.

Communicating about the company or the Group

- We can communicate about the company or the Group in strict accordance with the following rules:
- Words must be consistent **with the principles and rules** in the Code of Ethics.
 - Internal social media channel and tools can be used for open communication in a **respectful way**. We should always be mindful to keep the discussion **constructive**, even when exchanging potentially diverging viewpoints.
 - Communication posted by the Group on external social networks : we can like the publication and share supportive comments.
 - We must specify that we are speaking on an individual basis and specify that the comments are ours and in no way those of the company or the Group. To avoid risks associated with social media use, we utilize **common sense** in our communications, just as we would in any professional environment.

In practice

You have taken part in a project carried out by our company that receives a lot of media attention. You are contacted by a journalist who wants to know more about your personal involvement in the project.

- ✓ You should politely inform the journalist that you cannot answer any questions, but that you will inform your Group’s Corporate Communication Department about his request.

¹⁰ These include social networks, blogs, photo and video sharing sites, forums, etc.

A close-up, high-resolution photograph of a person's eye, showing the iris, eyelashes, and surrounding skin. The eye is looking slightly to the right. The background is a soft, out-of-focus grey.

COMPLYING **WITH THE CODE OF ETHICS**

Ensuring adherence to this Code of Ethics and fostering transparency and accountability is everyone's responsibility, including the duty to report any violations or suspected breaches of the Code.

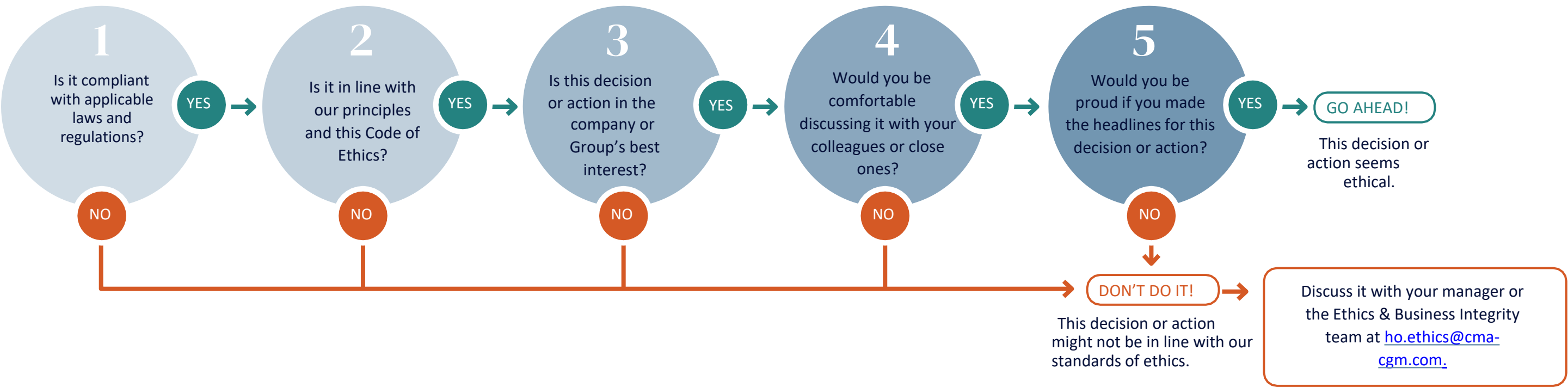
ENSURING COMPLIANCE WITH THIS CODE

This Code establishes an ethical basis and framework for the Group’s core values, governing its relationships with employees, customers, suppliers, representatives and any other public or private organisation.

All employees and representatives of the Group must adhere to this Code of Ethics in all internal and external dealings. Management is responsible for ensuring compliance, and any breach may result in disciplinary actions, as outlined by each Group entity’s internal regulations and applicable labor laws. In addition, violations may lead to civil or criminal proceedings against the employee, as well as potential criminal liability for the Group and its representatives

A culture of openness and employee accountability is essential to prevent and address any illegal conduct or practices that contravene this Code of Ethics.

Before making a decision or an action, ask yourself those 5 questions:



HAVE ANY QUESTIONS OR DOUBTS ON THE APPLICABLE LAWS OR THIS CODE OF ETHICS?

Reach out to:

- ↳ your manager; or
- ↳ your local compliance representative; or
- ↳ the Ethics & Business Integrity team at ho.ethics@cma-cgm.com.



REPORTING VIOLATIONS

The Group encourages you to voice your concerns or report any observed or presumed infringement of the law or its internal policies (including this Code of Ethics). This is done via company-approved channels for reporting compliance issues.

If you witness or know of a behavior contrary to the laws or this Code of Ethics, speak up!

Talk about it

- ↳ Your manager
- ↳ Your human resources contact
- ↳ Ethics & Compliance
ho.ethicsalert@cma-cgm.com

File a report

- ↳ Through the [on-line Ethics & Compliance Helpline](#)



Whistleblower’s protection

All information disclosed is kept **confidential**, in accordance with law and company policy.

Anonymous reporting is possible in countries where it is legally permitted. Reports of conduct likely to constitute a breach of the Code of Ethics or of applicable laws and regulations will be investigated internally, as appropriate.

The Group is committed to taking appropriate action where actual harm results from infringement of the law or its internal policies.

Furthermore, the Group undertakes to protect anyone who has, in good faith, reported a potential or actual breach of the law or of its internal policies from any form of reprisal.



[Speak-up and non-retaliation policy](#)





RESOURCES AND CODE VALIDITY



CMA CGM policies and additional resources

In addition to this Code of Ethics and the Group policies, all employees are required to comply with applicable laws, company policies and procedures relevant to their role.

Contact your manager or visit the Ethics & Compliance intranet team site for additional information, guidance and resources.



Severance and language

Should any provision of this Code be deemed null and void by law, regulation, or judicial decision, it shall be deemed deleted. Nevertheless, the rest of this Code shall remain in force and unchanged. The French version is the reference document in France and the English version is the reference document outside of France.



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