ZIM's Code of Ethics

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Purpose of the Code of Ethics:
The purpose of the Code of Ethics is to guide ZIM employees in making business decisions, in ethical management of ZIM’s business activities, in compliance with the requirements of the law. The Code of Ethics is an extension of ZIM’s values – adoption of the Code of Ethics constitutes a declaration of our commitment to act to achieve our goals and to realize the full potential inherent in ZIM while exhibiting integrity and reliability vis-à-vis our customers, suppliers, business associates and employees.

ZIM's Vision:
Innovative Shipping Dedicated to You

ZIM's Values:
- **Can-Do Approach** – we always have the will and will always find the way
- **Agile** – we adapt quickly to market currents, changes, trends and needs
- **Results-Driven** – we deliver a great process and will be measured by the bottom line
- **Togetherness** – we are many and diverse, yet act as one ZIM team
- **Sustainability** – we treat our oceans and our communities with care and responsibility
Maintaining our values and operating in an ethical manner has guided and shaped our Company over the years. We stand by our corporate values every day, and endeavor to implement them in our daily business activities and in our relationships with our various stakeholders.

Duty to Comply with the Code of Ethics:

ZIM’s Code of Ethics is a general guide specifying the rules of business conduct to which ZIM has committed itself, as well as ZIM’s commitment to comply with the various laws governing business conduct. The Code of Ethics governs ZIM, its controlled subsidiaries (companies in which ZIM holds more than 50% of the means of control of the Company), its directors and employees, and any employee or director in each of its controlled subsidiaries. Wherever the word “ZIM” or “the Company” is mentioned in this Code of Ethics, it also includes any of the subsidiaries controlled by ZIM.

Any undertaking or endeavor by ZIM as detailed in the Code of Ethics is also considered an undertaking or endeavor by its employees. Failure to read the Code of Ethics does not exempt any employee from complying with all the rules prescribed by the Code, abiding by the various provisions of the law and complying with ZIM’s procedures pertaining to such employee’s work.

The Code of Ethics:

**Commitment to uphold and comply with the law**

*Compliance with the law: ZIM undertakes to comply with the requirements of the law anywhere it operates, including antitrust laws, shipping laws and financial reporting laws and regulations.*

In order to comply with antitrust laws we must not (i) communicate to any competitor commercially sensitive information, including prices, terms which affect pricing or production levels or strategic plans; (ii) divide or allocate markets; (iii) agree to boycott another competitor or customer; (iv) place inappropriate conditions on purchases or sales. In addition, ZIM maintains a zero-tolerance approach to any form of bribery and corruption.

ZIM undertakes to be well-versed in the laws relevant to its operations and to comply with them. Any failure to comply with the law should be reported to the direct manager and, where necessary, to the Company’s Internal Auditor.
Conduct vis-à-vis the legal authorities:

ZIM undertakes to submit full and accurate reports as required under law. ZIM undertakes to fully cooperate in respect of any investigation or clarification on the part of the legal authorities vis-à-vis ZIM.

Commitment to fairness in business and integrity in doing business

Commitment to reliability and integrity:
ZIM undertakes to conduct business in an honest, ethical and professional manner vis-à-vis all entities with which it maintains business contacts. In addition, ZIM takes a zero-tolerance approach to bribery and corruption in accordance with our anti-bribery and anti-corruption compliance policy and related procedures.

Quality of customer service:
ZIM strives to provide its customers with a high quality of service, in compliance with the customer’s legitimate requirements. ZIM will act constantly to improve the quality of its service and to expand the variety of services provided to its customers.

Contracting with suppliers and business associates:
ZIM will act to contract with suppliers and business associates who will best meet the Company’s needs. ZIM undertakes to refrain from contracting with suppliers and business associates where ZIM is aware that they do not comply with high standards of ethical conduct.

Protecting Company assets

Financial reports:
ZIM undertakes that all financial transactions will be approved in accordance with the approval hierarchy designated in the Company’s procedures and required by law. ZIM undertakes that all transactions as are required by law will be recorded fully and accurately in the company’s books and that the Company’s accounting records will be carried out in accordance with the accounting principles governing the Company.
Protecting assets:
ZIM will act to use the Company’s assets in a prudent manner and for the benefit of the Company and its shareholders while protecting the integrity of the Company’s assets, including cash, equipment, fixed assets, the fleet of vessels and intangible property (computer software programs, intellectual property and goodwill).

Financial liability:
ZIM will strive to use the Company’s funds economically and efficiently for the purpose of acquiring equipment and services for the Company’s needs, in compliance with the Company’s procedures relevant to such engagement.

Transactions with related parties:
transactions with related parties will be carried out appropriately, in accordance with the law and in accordance with the Company’s procedures relevant to the approval of transactions with related parties.

Usage of IT systems:
ZIM undertakes to use its IT systems solely for work purposes.

Confidentiality:
ZIM undertakes to protect the safety of the Company's information and, within this framework, to keep confidential and not transfer to any third party, and not make any use of (beyond that required for the purpose of performing the work), either in writing or verbally, any information and/or data disclosed as part of the work at the company or in connection therewith, which pertain to the company’s activities.

Inside information and laws of securities:
Within the framework of the work at ZIM, employees are made privy to extensive business information, that, had it been available to a reasonable investor, could be used by that investor to make a decision as to whether or not to invest in shares affected by ZIM's activity (hereinafter: “inside information”, as per the definition of this term in the securities laws in the countries where the relevant company is traded). ZIM undertakes not to make use of inside information with a view to making decisions as to investment in shares affected by ZIM’s activity, and further, ZIM will not disclose such information to parties outside the Company, if not required for work purposes.
The use of such information or the transfer thereof to a third party constitutes an offense under the securities laws, and is likely to result in criminal proceedings.
Conflict of interest:
ZIM undertakes to make decisions for the best interests of the Company and not for any personal benefit. In any event of a conflict of interest or concern that a conflict of interest may exist between the Company’s best interests and an employee’s own benefit, the same will be reported to the immediate manager or to the Company’s Internal Auditor before making such decisions.

Gifts:
ZIM’s employees will not accept, directly or indirectly, on their or others’ behalf, any gift, proposed recreation, vacation, service, loan or any other benefit from any person or business entity, with whom or with which they have entered into transactions within the framework of their capacity at the Company, except as permitted by the Company’s procedures.

In addition, ZIM employees and representatives are prohibited from granting gifts to government public officials and their relatives, vendors or other third parties, except for small promotional or pre-approved gifts, in accordance with ZIM’s policy and procedures.

Striving for constant improvement
while setting challenges and meeting them

As a commercial company striving for excellence, ZIM will continue to set challenging goals for the Company and will strive to meet them. ZIM will establish, on a yearly basis, work plans and a budget that are adapted to the Company’s activity for the purpose of achieving such goals.

Creating an equitable and supportive work environment –

As we face global challenges and regulatory demands, our task is to increase our efforts towards sustainability in every field of our activity.

Equitable employment and work conditions:
ZIM undertakes to provide to all Company employees equitable employment terms, to pay fair remuneration in accordance with the type of work, and to pay wages and social benefits in accordance with the relevant legislation in each country.
Equal employment opportunities:
ZIM undertakes to promote a cooperative and productive work environment. ZIM will offer equal employment opportunities in recruitment, promotion, receipt of benefits and training to all employees and candidates for work, irrespective of race, color, gender, sexual preference, religion, national origin, family status, age or disability.

Safety and hygiene:
The Company regards a safe and clean work environment as an important contributing factor in the employee’s welfare. Accordingly, ZIM acts to comply with safety and hygiene standards at sea and on land and in accordance with the Company’s procedures relevant to such issues.

Prevention of Sexual harassment:
Sexual harassment and abuse are in total violation of the Company’s policy. Sexual harassment and abuse constitute severe disciplinary offenses likely to result in dismissal, and furthermore constitute a criminal offense. ZIM undertakes to act to implement everywhere the provisions of the law concerning the prevention of sexual harassment, with a view to uprooting this phenomenon.

Environmental awareness:
ZIM acts so as to conduct its business with maximum consideration for environmental impact, with a view to mitigating possible damage to the environment. ZIM acts to protect the environment on the global level, to comply with high standards of safety and strict compliance with the MARPOL regulations as enacted by IMO, and any other international provisions of law relating to protecting the environment and natural resources.

Community involvement:
ZIM acts in the community by supporting communal and social causes and organizations, and by encouraging the participation of the Company’s employees in activities which contribute to community welfare.

Using the Code of Ethics:
The Code of Ethics constitutes a summary of the norms of business conduct and the rules that must accompany and guide the activity of ZIM and ZIM’s employees.

Accordingly, our employees must be well-versed in the Code of Ethics and undertake to uphold it in full. It should be borne in mind that the Code of Ethics cannot cover all issues or situations which we may have to
deal with, and the content thereof is added to a long list of various laws governing ZIM and its employees, as well as the work procedures existing in the Company Procedures which can be found here.

For the purpose of understanding the procedures in place in each business unit, employees may contact their direct managers.

In any event of concern regarding violation of any law, regulation, procedure or any of the provisions of the Code of Ethics, it is both possible and imperative to make a complaint which can be made anonymously via the Company’s Whistle Blower or via the mailing address:

ZIM Integrated Shipping Services Ltd.
P.O.B. 15067 Park Matam, Haifa 3190500, Israel
Att: Internal Auditor, and mark “Private & Confidential”.

The complaint will be referred in full and anonymously to the Company's Internal Auditor.

Non-Retaliation Policy

ZIM does not tolerate retaliation against anyone who in good faith reports a possible violation of law, code of ethics or other ZIM policy or procedure, or who questions ongoing or proposed conduct, or who participates in an internal investigation. Retaliation can include demotion, transfer or termination. An employee who retaliates or attempts to retaliate against anyone who reports a concern or question, or who participates in an internal investigation, may be subject to disciplinary action including termination.