



GASLOG

CODE OF BUSINESS CONDUCT AND ETHICS

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CODE OF BUSINESS CONDUCT AND ETHICS

1. PURPOSE:

The Code of Business Conduct and Ethics (the “Code”) sets out basic principles to guide Covered Persons regarding the minimum requirements expected of them. However, this Code does not provide a detailed description of all policies of GasLog Ltd. (“GasLog”), GasLog Partners LP (“GasLog Partners”), and together with their respective subsidiaries and affiliates (the “GasLog Entities”), and it does not cover every issue that may arise. In general, if a Covered Person is unsure of what to do in any situation, he or she should seek guidance from a manager, the General Counsel or the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee, as applicable.

All Covered Persons must attest to the Code annually. The Legal and HR departments will provide training programs periodically to ensure an understanding of all aspects of the Code.

2. SCOPE:

This Code is applicable to all the GasLog Entities’ employees (including agency staff, secondees and volunteers), directors, officers and agents.

3. OWNERSHIP:

This Code has been adopted by the Boards of Directors (the “Boards”) of GasLog and GasLog Partners.

The owner of this Code is the General Counsel.

4. DEFINITIONS:

Covered Person: Any of the GasLog Entities’ employees (including agency staff, secondees and volunteers), directors, officers and agents.

GasLog Audit and Risk Committee: The Audit and Risk Committee of the Board of GasLog.

GasLog Partners Audit Committee: The Audit Committee of the Board of GasLog Partners.

General Counsel: The General Counsel of GasLog and GasLog Partners.

5. CONFLICTS OF INTEREST:

A conflict of interest occurs when a Covered Person’s private interests interfere with the interests of the GasLog Entities as a whole. While it is not possible to describe every situation in which a conflict of interest may arise, Covered Persons must never use or attempt to use their position with the GasLog Entities to obtain improper personal benefits for themselves or for members of their families. Any Covered Person who is aware of a conflict of interest, or the appearance of a conflict of interest, or is concerned that a conflict might develop must disclose such information immediately to the General Counsel or the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee, as applicable.

In the event that a conflict of interest question is raised, the GasLog Audit and Risk Committee or GasLog Partners Audit Committee, as applicable, shall have the responsibility to determine whether a conflict of interest exists. It may establish procedures to arrive at its conclusion and to approve or reject, or otherwise resolve, a potential conflict of interest.



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6. CORPORATE OPPORTUNITIES:

A Covered Person may not:

- take personally for himself or herself opportunities that are discovered through the use of the GasLog Entities' property, information or position;
- use the GasLog Entities' property, information or position for personal gain; or
- compete with the GasLog Entities.

Covered Persons owe a duty to the GasLog Entities to advance their legitimate interests when the opportunity to do so arises.

When the GasLog Audit and Risk Committee or GasLog Partners Audit Committee is presented with a potential misuse of corporate opportunity, it has the ability to determine whether a Covered Person has breached the statements above and it may approve or reject, or otherwise resolve the alleged misuse.

7. CONFIDENTIALITY AND PRIVACY:

It is important that Covered Persons protect the confidentiality of the GasLog Entities' information. Covered Persons may have access to proprietary and confidential information concerning the GasLog Entities' business, clients and suppliers. Confidential information includes any internal information obtained in the course of employment, including but not limited to non-public information concerning the GasLog Entities' business, financial results and prospects, the GasLog Entities' customers and suppliers, the GasLog Entities' contracts, agreements or investments, potential corporate transactions involving the GasLog Entities and any legal proceedings commenced by or against the GasLog Entities as well as any non-public information that might, if disclosed, be of use to the GasLog Entities' competitors or harmful to the GasLog Entities or their customers. Covered Persons are required to keep such information confidential during employment as well as thereafter, and not to use, disclose, or communicate that confidential information other than in the course of employment with the GasLog Entities, except when disclosure is authorized by the GasLog Entities or legally mandated. The consequences to the GasLog Entities and the Covered Person concerned can be severe where there is unauthorized disclosure of any non-public, privileged or proprietary information. Among other things, disclosure of material non-public information relating to the GasLog Entities could violate applicable insider trading laws and could result in significant civil and criminal penalties for the individual, in addition to penalties that may be imposed upon the GasLog Entities and their supervisory personnel.

Covered Persons should immediately notify the General Counsel of any known or suspected leak of confidential information. Based on the information received, the General Counsel, together with the GasLog Entities' Head of Investor Relations, shall determine if any measures should be taken.

8. HONEST AND FAIR DEALING:

Covered Persons must endeavour to deal honestly, ethically and fairly in all of their activities undertaken on behalf of the GasLog Entities. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct. Fair conduct is considered to be conduct that is



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free from unfair advantage through manipulation, concealment or misrepresentation of material facts, abuse of privileged or confidential information or any other unfair-dealing practice including discrimination and/or harassment.

9. FREEDOM FROM DISCRIMINATION AND HARASSMENT:

The GasLog Entities have a zero-tolerance approach to discrimination, bullying and harassment, whether at shore or at sea, including personal harassment, sexual harassment, bullying and abuse of authority, and are committed to creating an environment in which all individuals are able to make the best use of their skills, free from such behaviours. The GasLog Entities are committed to providing a working environment free from discrimination against staff on the basis of sex or sexual orientation, marital or civil partner status, gender identity or expression, race (which includes colour, nationality, ethnic or national origin), religion or belief, disability, age and pregnancy or caregiving status (collectively known as “protected characteristics”), as well as one where harassment and bullying does not occur. It should be noted that all Covered Persons are required to work in a manner that prevents the same and individuals are encouraged to report concerns regarding any event related to discrimination, bullying or harassment, following the process outlined in the GasLog Entities’ Compliance/Whistleblower Protection Policy. Discrimination, harassment and bullying are offensive, are violations of the GasLog Entities’ Code of Business Conduct, and are unlawful and may subject the GasLog Entities and any employee involved in such behaviours to liability, both criminal and civil. Complaints of discrimination, harassment and bullying will be investigated promptly, sensitively and confidentially to the greatest extent possible.

10. HEALTH AND SAFETY:

The GasLog Entities strive to provide each Covered Person with a safe and healthy work environment. Each Covered Person is responsible for maintaining a safe and healthy workplace for all Covered Persons by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Threats or acts of violence and physical intimidation are not permitted. The use of illegal drugs in the workplace will not be tolerated.

11. MODERN SLAVERY:

The GasLog Entities have a zero-tolerance approach towards any form of slavery, forced labour or human trafficking (“Modern Slavery”). The GasLog Entities are committed to ensuring that there are no acts of Modern Slavery within their own business or knowingly within their supply chains. Covered Persons are required to assist the GasLog Entities’ efforts to combat Modern Slavery by identifying potential risk areas in our business and our supply chain and taking necessary steps to mitigate against such risks. Any actual or potential instances of Modern Slavery should be reported to the General Counsel or the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee, as applicable.

12. PROTECTION AND PROPER USE OF COMPANY ASSETS:

The GasLog Entities’ assets are only to be used for legitimate business purposes and only by authorized Covered Persons or their authorized designees. This applies to tangible assets (such as on-board equipment, office equipment, telephone, copy machines, etc.) and



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intangible assets (such as trade secrets and confidential information). Covered Persons must protect the GasLog Entities' assets from theft and loss and ensure their efficient and safe use. Covered Persons may not make improper payments in violation of law or the GasLog Entities' policy. Theft, carelessness and waste have a direct impact on the GasLog Entities' profitability. If a Covered Person becomes aware of theft, waste or misuse of the GasLog Entities' assets, such Covered Person should report this to his or her manager or the General Counsel or the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee, as applicable.

13. COMPLIANCE WITH LAWS, RULES AND REGULATIONS:

All Covered Persons are responsible for complying with the various laws, rules and regulations of the countries and regulatory authorities that apply to the GasLog Entities' business. Any Covered Person who is unsure whether a situation violates any applicable law, rule, regulation or the GasLog Entities' policy should contact his or her manager or the General Counsel or the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee, as applicable.

14. SECURITIES TRADING, PROHIBITION ON LOANS:

The GasLog Entities are subject to a number of laws concerning the purchase of the preference shares of GasLog, the preference units of GasLog Partners and other publicly traded securities. The GasLog Entities' policy prohibits Covered Persons and their family members from trading securities of any public company while in possession of material, non-public information relating to such company. Please see the GasLog Entities' Trading Policy.

U.S. securities laws prohibit the GasLog Entities from, directly or indirectly (including through subsidiaries), (i) extending or arranging for the extension of personal loans to their directors or executive officers and (ii) renewing or materially modifying existing loans to such persons. Directors shall not seek or facilitate personal loans from the GasLog Entities in contravention of the foregoing.

15. DISCLOSURE:

The Chief Executive Officer and Chief Financial Officer of GasLog or GasLog Partners, as applicable, must certify to the material accuracy and completeness of the GasLog Entities' periodic reports. In order to allow them to deliver such certification, each Covered Person shall take such action as is reasonably appropriate in light of his or her position or relationship with the GasLog Entities to (i) establish and comply with disclosure controls and procedures and accounting and financial controls that are designed to ensure that material information relating to the GasLog Entities is made known to the GasLog Entities' directors and officers, (ii) confirm that the GasLog Entities' periodic reports comply with applicable laws, rules and regulations and (iii) ensure that information contained in the GasLog Entities' periodic reports fairly presents in all material respects the financial condition and results of operations of the GasLog Entities.

In addition, each Covered Person shall promptly bring to the attention of the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee any information he or she may have concerning (i) significant deficiencies and material weaknesses in the design



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or operation of internal control over financial reporting which are reasonably likely to adversely affect the GasLog Entities' ability to record, process, summarize and report financial data or (ii) any fraud, whether or not material, that involves a Covered Person. In addition, each Covered Person shall promptly bring to the attention of the General Counsel or the Chair of the GasLog Audit and Risk Committee or GasLog Partners Audit Committee any information he or she may have concerning evidence of a material violation of securities laws or other laws, rules or regulations applicable to the GasLog Entities and the operation of their business, by the GasLog Entities or any agent thereof. Please see "Clause 21: Duty to Report".

Covered Persons shall not knowingly (i) make, or permit or direct another to make, materially false or misleading entries in the GasLog Entities' financial statements or records, (ii) fail to correct materially false and misleading financial statements or records, (iii) sign, or permit or direct another to sign, a document containing materially false and misleading information or (iv) falsely respond, or fail to respond, to specific inquiries of the GasLog Entities' independent auditor or outside legal counsel.

16. DIRECTORS:

The business of the GasLog Entities is managed under the direction of the Boards and the various committees thereof. The basic responsibility of the directors is to act honestly and in good faith with a view to the best interests of the GasLog Entities. The Boards are not expected to assume an active role in the day-to-day operational management of the GasLog Entities.

In carrying out their duties and responsibilities and setting the general policies pursuant to which the GasLog Entities operate, directors should endeavour to promote fair dealing by the GasLog Entities and Covered Personnel with customers, suppliers, competitors and their employees.

In carrying out their duties and responsibilities, directors should comply, and cause the GasLog Entities to comply, with applicable governmental laws, rules and regulations.

Directors should endeavour to cause the GasLog Entities to proactively promote ethical behaviour and to encourage employees to report evidence of illegal or unethical behaviour to appropriate GasLog Entities personnel.

17. OUTSIDE DIRECTORSHIPS AND OTHER OUTSIDE ACTIVITIES:

Although activities outside the GasLog Entities are not necessarily a conflict of interest, a conflict could arise depending upon a Covered Person's position within the GasLog Entities and the GasLog Entities' relationship with the entity involved in such outside activity. Outside activities may also be a conflict of interest if they cause a Covered Person, or are perceived to cause a Covered Person, to choose between that interest and the interests of the GasLog Entities. As discussed in Section 5, Covered Persons are required to immediately disclose any actual or potential conflicts of interest.

17.1. Outside Directorships:

Covered Persons (other than the non-executive directors of the GasLog Entities) may not serve as directors of any outside business organization unless such service is specifically approved by the General Counsel and the Chairs of the Boards. There are a number of factors



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and criteria that the GasLog Entities will use in determining whether to approve a Covered Person's request for an outside business directorship.

For example, directorships in outside companies are subject to certain legal limitations. Directorships in outside companies should also satisfy a number of business considerations, including (i) not interfering with the interests of the GasLog Entities and (ii) not detracting in any material way from the Covered Person's ability to fulfil his or her commitments to the GasLog Entities. The GasLog Entities will also take into consideration the time commitment and potential personal liabilities and responsibilities associated with the outside directorship in evaluating requests.

17.2. Other Outside Engagements:

We recognize that Covered Persons often engage in community service in their local communities and engage in a variety of charitable activities, and we commend efforts in this regard. However, it is every Covered Person's duty to ensure that all outside activities, even charitable or pro bono activities, do not constitute a conflict of interest and are otherwise consistent with employment by the GasLog Entities.

18. RELATIONSHIPS WITH GOVERNMENT OFFICIALS:

All Covered Persons should be aware that practices that may be acceptable in the commercial business environment (such as providing certain transportation, meals, entertainment and other things of nominal value), may be entirely unacceptable and even illegal when they relate to government officials or others who act on a government's behalf. Covered Persons are expected to adhere to the relevant laws and regulations governing relations with government officials or others who may act on a government's behalf, including customers and suppliers, in every country where they conduct business. Covered Persons must also adhere to the GasLog Entities' Anti-Corruption Policy and Gifts and Hospitality Policy, which outline what may and may not be permitted in terms of relationships with government officials.

19. POLITICAL CONTRIBUTIONS:

Laws in many jurisdictions may prohibit or limit political contributions by corporations to candidates or to other political campaigns. In accordance with these laws, the GasLog Entities do not make direct contributions where applicable laws make such contributions illegal. Covered Persons may make personal political contributions in accordance with applicable laws, but contributions to candidates or to other political campaigns by Covered Persons must not be, or appear to be, made with, or reimbursed by, the GasLog Entities' funds or resources. The GasLog Entities' funds and resources include (but are not limited to) the GasLog Entities' facilities, computers, office supplies, letterhead, telephones and fax machines. Political contributions from the GasLog Entities' funds may only be made in accordance with the GasLog Entities' Anti-Corruption Policy.

Covered Persons who hold or seek to hold political office must do so on their own time, whether through vacation, unpaid leave, after work hours or on weekends. Additionally, all Covered Persons (other than the GasLog Entities' non-executive directors) must obtain advance approval from the General Counsel prior to running for political office to ensure that there are no conflicts of interest with the GasLog Entities' business.



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20. PROCEDURES REGARDING WAIVERS:

Because of the importance of the matters involved in this Code, waivers will be granted only in limited circumstances and where such circumstances would support a waiver. Waivers of the Code may only be made by the GasLog Audit and Risk Committee or the GasLog Partners Audit Committee and may need to be publicly disclosed by the GasLog Entities.

21. DUTY TO REPORT:

Covered Persons shall take all appropriate action to report any known misconduct by fellow Covered Persons that violate this Code.

Please see the GasLog Entities' Compliance/Whistleblower Protection Policy for a description of how to report potential violations. Note that reports may be made anonymously, and the GasLog Entities will not retaliate or allow retaliation against those who report concerns or suspicions in good faith.

22. LINKED DOCUMENTS:

- Trading Policy;
- Compliance/Whistleblower Protection Policy;
- Anti-Corruption Policy;
- Gifts and Hospitality Policy; and
- Modern Slavery Statement