

SUPPLIER CODE OF CONDUCT BUSINESS MANAGEMENT SYSTEM

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1. INTRODUCTION

1.1. Document Purpose

This Supplier Code of Conduct have been established to ensure safe working conditions throughout Global Maritime’s Supply chain, ensuring that workers are treated with respect and dignity, impartially and fairly, that business operations are environmentally sound, and that business is conducted in accordance with internationally recognised principles and relevant international conventions relating to responsible business conduct.

The Principles set out minimum standards of behaviour and practices Global Maritime require from suppliers. Global Maritime requires all its suppliers to adhere to these Principles, in addition to the provisions of any commercial terms agreed between Global Maritime and the supplier.

In this document, *Supplier* is used for both suppliers and sub-contractors.

1.2. Document Scope

The principles in the Supplier Code of Conduct are applicable to all suppliers who supply products and/or services related to Global Maritime’s contracts or purchase orders.

Suppliers shall cascade the principles to their own suppliers in order to ensure alignment and implementation throughout their supply chain for both direct and indirect products and services. This includes but is not limited to, in addition to subcontractors directly involved in production, agents, intermediaries, recruitment/employment agencies.

1.3. Responsibilities

Owner of this document is the GM Chief Executive Officer (CEO), supported by the Chief Safety, Sustainability and Compliance Officer (CSSCO) for implementation, communication, and follow-up of the policy. All Regional and Operations Managers / Country Managers are responsible for ensuring their respective office and operations are working in accordance with this policy.

1.4. National Legislation

In all of their activities, GM’s suppliers must operate in full compliance with the legislation, rules, and regulations of the countries in which they operate. Where national law and the Supplier Code of Conduct differ, suppliers shall follow the higher standard.

1.5. Abbreviations and Acronyms

Abbreviation/ Acronym	Description
BMS	Business Management System
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CoC	Code of Conduct
CSSCO	Chief Safety Sustainability and Compliance Officer

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Abbreviation/ Acronym	Description
FCPA	US Foreign Corrupt Practices Act
GM	Global Maritime
UKBA	UK Bribery Act
UNGC	United Nations Global Compact Principles

1.6. References

Ref.	Document No.	Title
1	GMG-GOV-POL-0001	Code of Conduct
2	GMG-GOV-POL-0002	Anti-Corruption Policy
	GMG-GOV-POL-0003	Data Protection Policy
3	GMG-GOV-POL-0004	Sanctions Compliance Policy
4	GMG-GOV-POL-0005	Business Hospitality Policy
5	GMG-GOV-POL-0007	Whistleblower Policy
6	GMG-GOV-POL-0008	Integrity Due Diligence
7	GMG-HSEQ-POL-0001	HSEQ Policy Statement
8	GMG-COM-PRO-0002	Management of Suppliers

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2. GENERAL

To meet the standards on human and labour rights included in this Supplier CoC, Suppliers are required to perform human rights due diligence aligned with the OECD Guidelines for Multinational Enterprises and related guidance. Human rights due diligence is an established methodology for respecting human rights, consisting of six steps:

- Embed responsible business conduct into policies & management systems
- Identify & assess adverse impacts in operations, supply chains & business relationships
- Cease, prevent or mitigate adverse impacts
- Track implementation and results
- Communicate how impacts are addressed
- Provide for or cooperate in remediation when appropriate

Through human rights due diligence, suppliers are required to take proactive steps to identify and address any actual or potential adverse human rights impacts which they have caused, contributed to, or are directly linked to, through their operations, supply chain or business relationships.

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3. LABOUR RIGHTS

3.1. Freely chosen employment

Suppliers shall not use or profit from any form of human trafficking, slavery or forced labour, including involuntary prison labour. Suppliers shall ensure their employees shall have freedom of movement and the right to resign at any time and leave after meeting the conditions of their contract and notice period. Workers shall not be required to lodge government issued identification, passports or work permits to the supplier or labour agent as a condition of employment

No recruitment fees or related costs shall be paid by workers. Where evidence of fee-charging is identified, workers shall be reimbursed.

3.2. Child Labour

Child labour shall not be hired, used, or profited from. No child under the age of 15 shall be employed, except where the local minimum age is set to 14 in line with the exceptions contained in ILO Convention 138. Where the local minimum age of employment or mandatory school leaving age is higher than 15, children under that age shall not be employed in the specific country. Children and young persons under the age of 18 shall not conduct hazardous work. This includes work that could endanger their health, safety, or morals. Where young workers are subject to compulsory education laws, they may work only outside of school hours.

3.3. Wages, working hours and benefit

As a minimum, there shall be full compliance with applicable laws regarding wages, working hours, overtime, and benefits. In any event, wages should always be sufficient to meet basic needs and to provide some discretionary income. All overtime work shall be voluntary.

Deductions from wages shall not be permitted as a disciplinary measure.

The basis on which workers are paid is to be specified in a timely manner via a pay slip or similar documentation. All employees shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment.

3.4. Freedom of association

Suppliers shall respect employees' freedom of association and recognise the right to collective bargaining in accordance with national laws and regulations. Where the right to freedom of association and collective bargaining is restricted under law, Suppliers shall facilitate and not hinder, the development of parallel means of free and independent organisation and collective bargaining.

3.5. Non-discrimination

There shall be no discrimination in hiring or in conjunction with employment practices such as promotions, rewards, access to training, termination, or retirement on the basis of gender, race, religion, national or social origin, ethnicity, caste, age, disability, sexual orientation, gender identification or expression, pregnancy, political affiliation, union membership or any other status protected by applicable law.

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Supplier employees, or potential employees, should not be subjected to medical tests that could be used in a discriminatory way.

3.6. Regular employment

Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short-term contracting (such as contract labour, casual labour, or day labour) or other labour relationships. The duration and content of apprenticeship programmes shall be clearly defined.

3.7. Privacy

Suppliers shall recognise and respect employees' right to privacy and shall handle all personal data in accordance with laws and legislation e.g., European GDPR. Where surveillance is required, such as for safety purposes, investigating concerns or maintaining cyber security the impact on employees and others will be assessed and measures put in place to minimise interference with their privacy. Suppliers shall carefully consider whether and how their products, services, or technology, including if altered, may pose a potential risk to the right to privacy. Where such risk is identified, they shall put in place measures to prevent or mitigate the risk.

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4. HUMAN RIGHTS

4.1. Humanitarian laws and regulation

All applicable standards of international humanitarian law shall be respected. Suppliers shall carefully consider whether and how their products or technology, including if altered, may be used in breach of humanitarian law, which may again constitute human rights breaches. Where such risk is identified, measures shall be put in place to prevent or mitigate the risk.

4.2. Harassment, Harsh or Inhumane treatment

Suppliers shall create and maintain an environment that treats all employees with dignity and respect. Suppliers, their parent, subsidiary, and affiliated entities as well as any subcontractors, shall neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse.

4.3. Occupational Health & Safety

Worker exposure to potential safety hazards shall be minimised through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures, as well as by ongoing safety training.

Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment (PPE). Workers shall receive health and safety training. The training shall be documented. Workers shall not be disciplined for raising safety concerns.

Procedures and systems shall be in place to prevent, manage, track, and report occupational injury and illness, including provisions to encourage workers to report, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and to help workers return to work.

Workers are to be provided with appropriate, safe, and hygienic facilities. There shall be sufficient ventilation, ready access to clean toilet facilities, clean drinking water, facilities for sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier, or a labour agent are to be kept clean and safe, and provided with appropriate emergency exits, hot water for bathing or showering, and adequate heat and ventilation, as well as reasonable personal space along with reasonable entry and exit privileges.

4.4. Minority rights

Suppliers shall not engage in activities that cause or contribute to harm to the livelihoods of marginalised populations, such as through the irresponsible use of land, territories, or other natural resources. Suppliers shall carefully consider whether and how their activities may cause or contribute to such impact.

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5. ENVIRONMENT

Suppliers are required to have a precautionary approach towards environmental and climate challenges. In manufacturing operations, adverse effects on the community, the environment and natural resources are to be minimised while safeguarding the health and safety of the public.

5.1. Chemical and hazardous Materials

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

5.2. Wastewater and Solid waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled, and treated as required prior to discharge or disposal.

5.3. Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

5.4. Minimize waste- maximize Recycling

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

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6. QUALITY AND CONTINUOUS IMPROVEMENT

Global Maritime is certified according to ISO 9001, ISO14001 and ISO45001.

Suppliers are expected to work together with GM to ensure quality and continuous improvement in our operations and products.

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7. ETHICAL BUSINESS CONDUCT

7.1. Corruption, gifts, and hospitality

Suppliers shall comply with laws and regulations related to bribery, corruption, fraud, and all other illegal business activities.

Suppliers shall not offer, request, accept, or receive any kind of undue benefit, service, or incentives to/ from government officials, international organizations, or other third parties for the purpose of obtaining or retaining business or business advantage, or personal benefits. This includes a prohibition on so called 'facilitation' payments or 'grease' payments intended to expedite or secure performance of a routine governmental action like obtaining visa or customs clearance unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments (made under duress or blackmail) are permitted where there is an imminent threat to health or safety, but this must be documented and advised to GM. This applies whether the benefit is being offered directly or indirectly through an intermediary.

Suppliers shall not by intent or negligently search to get access to confidential information that may give an undue advantage.

Suppliers shall not, directly, or indirectly, offer, give, or accept gifts, hospitality or expense coverage that can give, or be perceived as, an improper advantage in connection with a person's position, tasks, or missions, unless the gift, etc. is of modest value. Representation, gifts, or expense coverage shall never be given or taken in connection with a bidding processes or negotiations related to contracts. The exception is a normal representation, when there is a legitimate business purpose, and the cost is kept within reasonable limits. Cash or cash equivalents shall not be offered, given, or received.

Suppliers shall not sponsor political parties or politicians in connection with the contract entered into with GM. Suppliers must undertake any lobbying activities in compliance with all applicable laws.

7.2. Competition

Suppliers shall always meet competitors in an honest and professional manner. The supplier shall not cause or be part of any breach of applicable competition laws and regulations, such as illegal cooperation on pricing, or illegal market sharing.

7.3. Money Laundering and tax obligation

Suppliers shall be firmly opposed to all forms of money laundering and shall take steps to prevent its financial transactions from being used by others to launder money. Suppliers shall report and pay its public taxes and fees according to the current law requirements.

7.4. Sanctions compliance

Suppliers shall ensure that neither they nor their suppliers are involved in business with parties that are subject to relevant sanctions, denied parties lists, or embargoed countries. GM shall immediately be notified of any nonconformity.

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7.5. Conflict of interest

Suppliers are required to avoid personal and financial interests which could conflict with their responsibilities to GM. All actual or potential conflict of interests should be immediately notified to GM and all affected parties.

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8. ADMINISTRATIONS

8.1. Audits

In the event of announced and unannounced assessments or audits of the supplier for the purpose of verifying compliance with the requirements in this document, GM personnel, GM's customer or GM consultants shall be provided relevant documentation and have unlimited access to any part of the premises where work under a contract is being performed as well as to relevant personnel. This also includes work performed at any subcontractors' premises.

8.2. Communication of principles

Suppliers shall communicate the requirements of the Principles to all workers, suppliers or subcontractors engaged in their supply chain. Suppliers are required take steps to ensure that their suppliers and subcontractors comply with requirements of the Principles. Suppliers shall also ensure that employees have access to channels to discuss and confidentially report non-compliance with the Principle.

8.3. Concerns

Suppliers shall have a system for reporting and handling concerns, including any breaches of the Principles in their own operations or with subcontractors, and shall without delay inform GM in writing of any concerns related to business with GM. GM expects full cooperation in relation to the investigation of these matters. Suppliers shall not practice retaliation against anyone raising or helping to address a genuine business integrity concern. Our suppliers shall implement programmes to ensure confidentiality and protection of whistle-blowers. Questions or reporting of concerns can be made to humanrights.request@globalmaritime.com or anonymous to GM's web-based whistle-blower channel: GMwhistleblowing@schjodt.no.