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# CODE OF CONDUCT

# Code of Conduct



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<b>Approved By</b>	Pavel Shparber, CEO / Darren Watts, Group Compliance Director Pavel Shparber, CEO
<b>Supersedes</b>	SMS/PRO/ERS/001 (legacy External References & Standards Procedure)

## INTRODUCTION

Seagull Maritime has evolved to become a leading risk management solutions provider across the maritime and maritime security industry. This code of conduct provides all Seagull Maritime personnel, be they staff, private contractors or sub-contractors or suppliers with the information necessary to work and conduct themselves accordingly while upholding the highest standards of business ethics and personal integrity when engaged in work on behalf of Seagull Maritime.

This code of conduct has 4 primary objectives:

Underline and reinforce our commitment to business ethics and compliance with national and international law.

Sets out the minimum standards of ethical and legal behaviour, reinforced by detailed individual policies where applicable.

Provides information on the reporting mechanisms for known or suspected ethical or legal violations.

To help identify and prevent wrongdoing.

## SCOPE

This code of conduct is applicable to all business conducted by Seagull Maritime.

All staff, personnel, contractors, sub-contractors and suppliers are required to be aware of and abide by the terms of the code.

## EXCLUSIONS

There are no exclusions under this code of conduct.

## OPERATING ENVIRONMENT & CONTEXT

In line with our Security Operations, Quality and Security Management Systems, we have considered all relevant internal and external factors that may impact our business activities and take care to consider all stakeholders and their considerations, concerns and responsibilities.

Through our External Standards & References Procedure (SM/INT/PRO/004), we monitor:

- International and national legal and regulatory requirements (e.g. licensing and export/import control for controlled goods).
- The political, natural and physical environments within which we operate.
- The role, perceptions and risk tolerance of our clients and other interested parties.
- Key international developments and trends in home state, flag and coastal states and any other areas of operation.
- Changes to international standards to which we certify.
- Changes in law or guidance, e.g. Human Rights, Anti-Bribery & Corruption

## CONTINUAL IMPROVEMENT

As an organisation and group, we strive for excellence in all that we do and are committed to a policy of continual improvement.

We always aim to deliver service and performance that will exceed the expectations of our clients. Where we fail to meet these expectations, we are committed to responding positively to such feedback and implementing corrective and preventive actions to avoid reoccurrence and implement long lasting changes to our methods to ensure improvement.

We are committed to seeking out new and innovative solutions and opportunities, be that using new technology, new staff or new certifications that allows us to overcome challenges and improve our service offering.

## LEGAL & REGULATORY COMPLIANCE

Obedying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built.

In conducting the business of the Company, employees shall comply with applicable governmental laws, rules and regulations of the Government of Malta, the Government of the United Arab Emirates and with any other jurisdiction in which the Company does business.

Employees, personnel and sub-contractors are also required to comply with the applicable governmental laws, rules and regulations of their home nation and/or the nation from which they work/represent Seagull Maritime.

While no one is expected to know and understand the details of every law, it is important that you know enough about the applicable local, state and national laws to determine when to seek advice from superiors where any doubt about compliance may occur.

It is imperative that everyone in the Company works together to ensure prompt and consistent action against violations of this Code. However, because it can be difficult to know if a violation has occurred, the best approach is always to ensure that we have all the facts. If in doubt, ask a superior.

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Seagull Maritime is committed to maintaining a Compliance Department staffed by appropriately experienced personnel that any doubt or enquiry can be raised at any time and appropriate guidance can be provided.

## **CULTURE, ETHICS & RESPECT**

Seagull Maritime is extremely proud of the diverse nature of our workforce with staff and personnel from multiple nations continually working together, sometimes in challenging environments, to deliver our services. We have built a culture of respect for ourselves and each other, conducting ourselves professionally, honestly and honourably. It is our expectation that all our stakeholders conduct themselves similarly in their dealings with us.

In our operations and our services, we will always account for the ethical considerations, together with the protection and enhancement of the moral position, of our clients and suppliers. As an international operator, our contractors and employees will consider, in the execution of their duties, local laws, customs and culture. We will ensure that our services and conduct is delivered within legal boundaries and company policy whilst respecting local customs.

## **CORPORATE & SOCIAL RESPONSIBILITY**

As an international organisation, operating across national and international boundaries, Seagull Maritime acknowledges its corporate and social responsibilities.

Our priority is not only the delivery of our services, but ensuring we deliver them in a manner that positively impacts on the societies and communities in which we operate. As part of this commitment, we implement successful local content programs as part of our operational activities; these programs draw support from the indigenous workforce and contribute to the local economy.

We are committed to identifying and joining with corporate and social responsibility programs, such as the UN Global Compact, that we can further enhance our work in this area.

## **HEALTH & SAFETY**

It is the responsibility of the company and, us as individuals, to keep us all healthy and safe from harm. Seagull Maritime complies with all applicable health & safety law and regulations and through our Health & Safety Policy and associated processes, aim to ensure a safe system of work and a safe working environment for all.

We understand the inherent dangers and limitations presented by the complex environments in which we operate and ensure that reasonable precautions are taken to identify and control risks and hazards. All personnel are trained and supplied with appropriate protective equipment to mitigate the risk of harm from workplace activities. All personnel are actively encouraged to report any health and safety risks or near miss situations.

## **ENVIRONMENT**

Seagull Maritime has a documented environmental policy that aims to ensure we respect the environment and understand and comply with applicable local and national environmental laws and obligations. (SM/HSE/POL/002)

We endeavour to:

- Assess and identify any environmental impact within our areas of our operations.
- Implement controls to prevent any environmental damage or pollution.
- Enhancing environmental awareness and commitment through structured training and encouraging the adoption of sound environmental principals and best practice among our supplier and partners.

## QUALITY, SECURITY & RISK

Seagull Maritime recognises the importance of ISO accreditations and the importance of managing the quality of our services, the security of our supply chain and operations and the management of risk to our business and our stakeholders.

We are therefore committed to maintaining the following ISO accreditations and management systems to ensure we demonstrate our capability in these areas:

- ISO 9001: 2015 - Quality Management Systems
- ISO 28000: 2022 - Security and resilience – Security management systems
- ISO 28007: 2015 - Ships and marine technology – Guidelines for Private Maritime Security Companies (PMSC) providing privately contracted armed security personnel (PCASP) on board ships (and pro forma contract)
- ISO 18788: 2015 - Management system for private security operations
- ISO 45001:2018 - Occupational health and safety management systems

## EQUAL OPPORTUNITIES & DISCRIMINATION

Seagull Maritime is fortunate in that we can employ staff and personnel from across the world enabling a diverse and vibrant work culture. We will treat all our personnel fairly and with respect and comply with applicable employment laws.

Issues of gender, race, religion, colour, age, personal disability or sexual orientation will never influence our decisions or actions. Refer to the Equal Opportunities Policy (SM/INT/POL/003) for full details.

All employment decisions will be made on qualifications and competency compared to clearly stated job specifications. We have a zero-tolerance policy towards any form of harassment or abuse; employees or co-workers should report any harassment or discriminatory behaviour to senior management or a Human Resources representative.

## HUMAN RIGHTS

Respect for human rights is fundamental to the operational capability and sustainability of Seagull Maritime and the communities and areas in which we operate. In our Company and across our management systems, we are committed to ensuring that people are treated with dignity and respect.

Our Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. (SM/SEC/POL/002)

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We are committed to working with and encouraging our partners and suppliers to uphold the principles in this Policy and to adopt similar policies within their businesses.

Seagull Maritime does not permit or condone the use of corporal punishment or other forms of mental or physical coercion, sexual harassment or abuse, nor execute threats of such treatment. All our personnel are trained to recognize and report any abuses of human rights.

As an active member of the International Code of Conduct Association, we endorse the principles set forth by the International Code of Conduct for Private Security Service Providers (the "Code"). The Code articulates responsibilities of private security companies under human rights and international humanitarian law to ensure the responsible provision of private security services, particularly when operating in complex environments and we acknowledge the importance of these responsibilities.

Seagull Maritime further endorses and adheres to the Voluntary Principles on Security and Human Rights (VPSHR) and the Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies during Armed Conflict. These frameworks guide our approach to the proportionate use of force, engagement with communities, and accountability in all operational theatres.

## CHILD LABOUR

We are committed to not employing child labour as defined by ILO Conventions 182 (worst forms of child labour) and 138 (minimum age).

Our recruitment and selection process complies with National Law and International Conventions. We will not employ anyone under the basic minimum age of 18 years other than those on government approved apprenticeships, training schemes or educational projects. Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.

In no circumstances will any person younger than 21 years of age be employed in duties that might require the use of a firearm.

Seagull Maritime will actively work to ensure that we do not cooperate or work with any organisation or business we identify as breaching child labour conventions.

## WORKING HOURS & PAY

Seagull Maritime complies with National Law and International Conventions on Working Hours, Leave and Wages. Our employees and contractors are paid fairly within agreed timeframes and receive legally mandated benefits required by local law. Any overtime is voluntary and is appropriately compensated.

Where employees reside in a country where minimum wage laws are in place, Seagull Maritime are committed to ensuring these laws are abided by.

Personnel do not work more than 48 hours per week unless it is permitted according to applicable laws, regulations and collective agreements. Specific information regarding pay and working hours is included within individual staff contracts.

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The Company compensates employees competitively compared to the industry and local economies. We operate in full compliance with applicable wage, work hours, overtime and benefits laws.

Our employees and contractors are paid fairly within agreed timeframes and receive legally mandated benefits required by local law. Any overtime is voluntary and is appropriately compensated.

## **FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING**

We respect our employees' right to join, form or not to join a union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

## **DRUGS AND ALCOHOL**

Seagull Maritime has a zero-tolerance policy towards drugs and alcohol. This means that any person found to be under the influence of illegal drugs or alcohol whilst on operational duty, in the conducting of their job role and/or on company property will have their contract terminated with immediate effect.

Our Drug and Alcohol Policy clearly states that employees or contractors are not permitted to consume alcohol or illegal drugs immediately prior to or during any operational activity. Furthermore, they are not permitted to have any alcohol or non-prescription drugs in their possession whilst embarked on any vessel. We aim to ensure that the use of alcohol or drugs does not in any way compromise the safety and efficiency of our services. (SM/INT/POL/010 – forthcoming)

All employees and personnel are required to familiarise themselves with the company Drugs & Alcohol Policy.

We will conduct scheduled and random drug and alcohol testing to ensure compliance.

## **CRIME**

Seagull Maritime will not contract with, support or service any government, person, or entity in a manner that would be contrary to National or International Law or Convention. Further to this we will not, and require that our personnel do not, participate in, encourage, or seek to benefit from any form of criminal activity including but not limited to: war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, the trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary executions.

## **BRIBERY AND CORRUPTION**

Seagull Maritime operates across multiple national and international jurisdictions, and we are committed to transparency and honesty, and oppose financial crime of any kind including bribery and corruption.

Seagull Maritime has a detailed Anti-Bribery & Corruption Policy, which all parties should refer to in connection with specific anti-bribery and corruption obligation. Our policy is designed and implemented to outline and assist our staff, personnel and suppliers with identifying and reporting bribery and corruption. (SM/INT/POL/001)

When considering bribery and corruption, we consider, acknowledge and adhere to:

UK Bribery Act 2010

Malta Chapter 326 Permanent Commission against Corruption Act (PCAC)

The UAE Penal Code, particularly Articles 234-239

Oman: Royal Decree 7/2018 (Penal Code) – Articles on bribery of public servants

Djibouti: Penal Code (Law No. 59/AN/94) – Articles 179-183 on corruption of public officials

Sri Lanka: Bribery Act (Chapter 26) and Commission to Investigate Allegations of Bribery or Corruption Act No. 19 of 1994

India: Prevention of Corruption Act 1988 (as amended 2018)

We also support and endorse the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

While personnel are not required to know every detail of the above legislation, personnel are trained to be aware of and recognise forms of bribery and to request support and assistance when operating in new locations or countries where specific legislation may need to be considered.

Our policy states that those acting on behalf of Seagull Maritime must not, promise, offer or give to any person or public official, directly or indirectly, anything of value for the public official them self or another person or entity, in order for that person to act or refrain from acting in the exercise of his or her official duties if such inducement is illegal. This includes the prohibition of facilitation or “grease” payments. Further to this Seagull Maritime does not directly or indirectly make political contributions or donations. Personnel found to be involved with any such corruption will face disciplinary action and will be reported to the appropriate authorities.

## **BUSINESS GIFTS AND HOSPITALITY**

Employees must not offer or accept any inappropriate or valuable personal gifts, hospitality or services from any person or business entity. The receipt or provision of any appropriate or authorised gift or hospitality must be reported and recorded. Any inappropriate offer or request for gifts or hospitality must be reported to senior management. Again, please refer to our Anti-Bribery & Corruption Policy for further details.

## **CORPORATE OPPORTUNITIES**

Employees are prohibited from taking opportunities that are discovered using corporate property, information or position without the consent of the Board of Directors. No employee may use corporate property, information or position for improper personal gain and no employee may compete with the Company directly or indirectly. Employees owe a duty to the Company to advance its legitimate interests whenever possible.

## FAIR DEALING

Seagull Maritime employees and personnel shall always behave honestly and ethically and with all people. They shall act in good faith, with due care, and shall engage only in fair and open competition, by treating competitors, suppliers, customers, and colleagues ethically and honestly.

Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

## CONFIDENTIALITY

Seagull Maritime is committed to the protection of all confidential information, in terms of both commercially sensitive data and personal information. We understand our responsibilities under the relevant data Protection legislation. As we operate across the world and cross-national boundaries, we have adopted and adhere to:

- UK Data Protection Act 2018 (DPA 2018) alongside UK GDPR
- The General Data Protection Regulation European Union and European Economic Area

Refer to the Personal Data Protection Policy (SM/INT/POL/005) for full details.

We will not disclose any sensitive or confidential information outside of the company nor will we use this information inappropriately. Employees must not discuss or disclose any confidential information in public where this can be seen or overheard by others. Confidential information must be stored in a safe and secure location.

Employees must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorised by an appropriate legal officer of the Company or required by laws or regulations. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed. It also includes information that suppliers and customers have entrusted to the Company. The obligation to preserve confidential information continues even after employment ends.

All staff and personnel are also reminded to ensure they check any additional data protection obligations they may be subject to when working or operating in other locations with the Compliance department.

## PROTECTION AND PROPER USE OF COMPANY ASSETS

All employees should endeavour to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be reported immediately for investigation. Company equipment should not be used for non-Company business, though incidental personal use is permitted.

The obligation of employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and

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copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorised use or distribution of this information would violate Company policy. It could also be illegal and result in civil or criminal penalties.

## FINANCIAL ACCURACY

All financial transactions must be conducted correctly and honestly. Employees must obtain adequate approval from personnel with the correct level of financial authorisation prior to any financial action. Employees must not intentionally do anything, which may be dishonest, misleading or incorrect. All transactions must be recorded accurately and promptly and held for audit purposes.

The CEO and CFO shall promptly bring to the attention of the Board of Directors, any information they may have concerning a) significant deficiencies in the financial reporting which could adversely affect the Company's ability to record, process, summarise and report financial data or b) any fraud that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal control over financial reporting.

## COUNTERPARTY DUE DILIGENCE

Seagull Maritime will identify counterparties and suppliers for every project and satisfy appropriate levels of due diligence prior to any business relationship. We have documented supplier approval procedures that are to be always followed. In so doing, we will endeavour to confirm the true nature, capability, trading history and identity of any business entity. As part of this process, Seagull Maritime will actively encourage all parties to comply with this Code and other appropriate policies and procedures.

## CONFLICT OF INTEREST

A conflict of interest exists when a private interest interferes in any way with the interests of the Company. A conflict can arise when an employee takes actions or has interests that may make it difficult to perform their work for the Company objectively and effectively. Conflicts of interest may also arise when an employee, or members of his or her family, receives improper personal benefits because of his or her position in the Company. Loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest. It is usually a conflict of interest for an employee to work simultaneously for a competitor, customer or supplier.

Conflicts of interest may not always be clear-cut; if there is any doubt, a director should be consulted. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of superiors or other appropriate personnel or consult the procedures described in the Violations Section of this Code.

All employees shall disclose any material transaction or relationship that reasonably could be expected to give rise to such a conflict to the Chief Financial Officer, the Group Compliance Director or the Chief Executive Officer. No action may be taken with respect to such transaction or relationship until approved.

Personnel must not engage in any activity which conflicts or competes with the interests of Seagull Maritime or in any way damages the company's reputation for integrity. Employees must not exploit

their position or influence, or misuse any Seagull Maritime asset including confidential information, for their own personal gain or benefit or that of an unauthorised third party. This also precludes any unfair bias or favouritism during the recruitment of personnel or any other business activity. Any potential conflict of interest must be reported to senior management.

## COMPLAINTS AND GRIEVANCES

Seagull Maritime has established complaints, whistleblowing and grievance procedures to address any issues or allegations raised. (SM/INT/POL/004)

We commit to:

- Welcome any report or allegation of improper and/or illegal conduct, including such acts or omissions that would violate the principles contained in this Code. Procedures will be fair, transparent and offer effective remedies, including recommendations for the prevention of recurrence.
- Investigate allegations promptly, impartially and with due consideration to confidentiality.
- Keep records about any such allegations, findings or disciplinary measures. Except where prohibited or protected by applicable law, such records should be made available to a Competent Authority on request. All investigation outcomes are available to all involved parties, including 3rd parties, whose rights might have been violated.
- Cooperate with official investigations, and not participate in or tolerate from their personnel, the impeding of witnesses, testimony or investigations.
- All answers are provided in English, or any other internationally recognized language that both parties can communicate in.
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Any complaint may be applied with emailing to the Company, or by phone, or as detailed in the Grievance and Whistleblowing Policy (SM/INT/POL/004).

No provision in this Code should be interpreted as replacing any contractual requirements or specific company policies or procedures for reporting wrongdoing.

## WHISTLEBLOWING

We are fully committed to supporting our employees, sub-contractors and other stakeholders and continually improving our systems and policies, especially those areas identified in this code. All staff and subcontractors should feel they are in an environment where they can highlight any concerns or infringements of any kind.

All employees and contractors are actively encouraged to report issues to senior management as soon as possible. All issues will be treated in the strictest confidence, but individuals may also highlight issues anonymously.

Individuals can either report directly by phone or email to any member the senior management, in the knowledge that this information will be treated in the strictest confidence. However, if an individual wishes to remain anonymous for whatever reason they are encouraged to write to Seagull Maritime, accordingly, highlighting the issue and relevant information that will allow for an investigation to be conducted.

## NON-RETALIATION

Seagull Maritime does not tolerate any form of harassment or victimisation and will take appropriate action to protect anyone who raises a concern or grievance in good faith. Any obstruction, discouragement or intimidation to prevent or discourage anyone raising such concerns will be seen as a violation of this Code and will result in disciplinary action.

## PUBLIC COMMUNICATION

Seagull Maritime believes that open, honest and accurate communication is key to the success and integrity of our business. To deliver accurate and consistent corporate communications only authorised personnel are permitted to speak with the media or make statements on behalf of Seagull Maritime on social media. Any private use of social media must not breach security or confidentiality obligations or compromise our reputation or business interests and be in accordance with our social media policy. Any request for an official comment on behalf of Seagull Maritime must be referred to senior management.

## TIMELY AND TRUTHFUL PUBLIC DISCLOSURE

In reports and documents filed with or submitted to Government institutions and other regulators by the Company, and in other public communications made by the Company, employees involved in the preparation of such reports and documents (including those who are involved in the preparation of financial or other reports) shall make disclosures that are full, fair, accurate, timely and understandable. Where applicable, these employees shall include thorough and accurate financial and accounting data. They shall not knowingly conceal or falsify information, misrepresent or omit material facts necessary to avoid misleading the Company's independent auditors or investors.

## ACCOUNTABILITY

If it is determined that an employee has violated this code or has withheld information related to a violation, the offending employee may be disciplined for non-compliance and may be subject to penalties up to and including dismissal under the Seagull Maritime disciplinary procedure. Such penalties may include written notices to the individual involved that a violation has been determined, censure, demotion or re-assignment of the individual involved and suspension with or without pay or benefits. Violations of this Code may also constitute violations of law and may result in criminal penalties and civil liabilities for the offending employee and the Company. All employees are expected to co-operate in internal investigations of misconduct.

## SANCTIONS COMPLIANCE

Seagull Maritime is committed to complying with all applicable international and national sanctions regimes, including those prescribed by the United Nations, European Union, United Kingdom, United Arab Emirates and Malta. The company shall ensure that it operates in accordance with the International Code of Conduct for Private Security Service Providers (ICoCA) guidelines on compliance with sanctions. This includes, but is not limited to, sanctions administered by the United Nations Security Council, the European Union, the United States (OFAC), and the United Kingdom (OFSI).

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To this end, the company shall establish and maintain appropriate procedures and controls to identify, monitor, and prevent dealings with individuals, entities, or countries that are subject to sanctions. The company shall not operate in any country that is subject to sanctions, unless an exception is made for humanitarian aid, emergency health issues, or other instances to save human lives or property at sea. In such cases, the company shall inform all related parties, including governments, of its activities and seek their guidance and approval.

The company shall regularly review and update its list of sanctioned countries to ensure compliance with the latest legal and regulatory requirements.

Seagull Maritime shall conduct due diligence on any new vendor, supplier, or client before entering into a business relationship with them to ensure that they are not on any sanctions list, also ensure that the client's vessels were not used to circumvent sanctions imposed by the United Nations, European Union, United Kingdom, United Arab Emirates and Malta. The company has established and maintained appropriate procedures and controls to prevent employees or agents from conducting business with individuals or entities that are on a sanction list and shall take prompt action to investigate and remedy any violations that occur despite these procedures and controls.

## REFERENCES

This Code of Conduct should be read in conjunction with the following Seagull Maritime documents: OH&S Policy (SM/HSE/POL/001), Environmental Policy (SM/HSE/POL/002), Security & Security Operations Policy (SM/SEC/POL/001), Human Rights Policy (SM/SEC/POL/002), Quality Policy (SM/QMS/POL/001), Anti-Bribery, Corruption & Business Ethics (SM/INT/POL/001), Equal Opportunities Policy (SM/INT/POL/003), Grievance & Whistleblowing Policy (SM/INT/POL/004), Personal Data Protection Policy (SM/INT/POL/005), Recruitment Policy (SM/INT/POL/006), Risk Management Policy (SM/INT/POL/007), Social Media Policy (SM/INT/POL/008), Training Policy (SM/INT/POL/009), Due Diligence & Client Vetting Procedure (SM/SEC/PRO/002), Rules on the Use of Force (SM/OPS/PRO/001), and the Legal & Regulatory Compliance Procedure (SM/HSE/PRO/002).

## REVIEW

This code of conduct is reviewed annually, at a minimum or whenever a piece of legislation, guidance or standard may change and require an immediate review.

A handwritten signature in black ink, appearing to read "Darren Watts".

Darren Watts

**Group Compliance Director**

02/04/2026

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## ACKNOWLEDGEMENT

All staff, personnel, sub-contractors, suppliers and stakeholders in receipt of, and having read this code of conduct are expected to abide by the terms therein from hereon forward.