	BUSINESS MANAGEMENT SYSTEM	Doc Ref: BMS-CP-03	Prepared by: MG
	Corporate Policy	Originated: 05 Mar 2024	Reviewed by: AR
	CODE OF CONDUCT	Revised: 05 Mar 2024	Approved by: FM
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1 PURPOSE

The purpose of this Code of Conduct is to establish and set out the general principles and standards of integrity that Interocean expects to be followed by everyone working for or representing Interocean in the workplace, and when undertaking business dealings with work colleagues, clients, suppliers, stakeholders and other third parties. These principles guide our standards of acceptable, desirable and responsible behaviour as well as ensuring compliance with laws and regulations.

2 SCOPE

This Code sets out the standards to which all Employees, Officers and Directors of Interocean must adhere. This Code also, where applicable, applies to Contractors, Sub-contractors, Agents, Intermediaries and Suppliers (collectively referred to as Employees/Representatives in this policy).

The Code must be complied with, and failure to do so may lead not only to disciplinary action, up to and including dismissal, but also criminal and civil penalties against the individual and Interocean.

3 RESPONSIBILITY

It is each person's responsibility to ensure that they comply with this Code and underlying legislation. This Code is supplemented by policies which set out practical help and guidance.

3.1 Chief Executive Officer

It is the responsibility of the Chief Executive Officer (CEO) to:

- be aware of and implement any applicable laws and regulations in each country in which the company operates
- ensure this Code is maintained in accordance with current applicable legislation/regulations
- ensure that all complaints are dealt with seriously, promptly and confidentially

3.2 Employees/Representatives


All Employees/Representatives are responsible for:

- ensuring they read, understand and adhere to the requirements of this Code, liaising with their Line Manager for clarification where necessary
- reporting any facts which they believe to have been against this Code of Conduct.

4 CODE OF CONDUCT

Individuals representing Interocean including Employees, Contractors and other third parties will comply with the following, not all inclusive, expectations and guiding principles for appropriate workplace behaviour:

- act with integrity at all times
- take responsibility for our own actions
- treat everyone equally, and respect and value differences
- avoid unwanted conduct that may affect the dignity of women or men in their workplace eg disability, sexual, racial harassment etc

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- respect the personal information of our employees, clients and suppliers
- do not allow personal relationships to affect professional relationships
- be ready and willing to work at the appropriate times
- respect each individual and their right to privacy
- work only for Interocean in Interocean's time
- do not act in a manner detrimental to Interocean's reputation
- safeguard Interocean property and information
- do not willfully disrupt company business
- promote a positive working environment
- provide a quality service that is continuously monitored, controlled and improved
- maintain a safe and healthy working environment that does not compromise the health and safety of any individual
- protect the environment by continuously striving to reduce our environmental footprint
- comply with the requirements of Interocean's policies and procedures
- avoid conflicts of interest
- invite full participation and support diversity
- comply with the spirit and requirements of applicable legislation and regulations
- treat clients and suppliers fairly
- maintain confidentiality of Interocean's sensitive commercial information
- avoid fraudulent activities at all times, and follow accurate invoicing procedures
- do not directly or indirectly exploit for personal gain any opportunities that arise on or through the use of company property, information or position
- do not receive or give bribes or act corruptly
- account for all benefits, monetary or in kind, received in the course of employment/while providing a service
- comply with all local competition and anti-trust rules
- prevent modern slavery from occurring in the workplace and in the supply chain.

5 REFERENCE

Policy BMS-CP-01, Anti-bribery and Corruption Policy

Policy BMS-CP-02, Gratuities and Gifts Policy

Policy BMS-CP-04, Health, Safety, Environment and Quality Policy


Policy BMS-CP-05, Use and Possession of Alcohol and Illegal Drugs

Policy BMS-CP-10, Public Interest Disclosure

Policy BMS-CP-17, Social Media Policy

Policy BMS-CP-18, Business Ethics Policy

Procedure BMS-HR-06, Disciplinary and Appeals

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Acknowledgement of Receipt, Review and Understanding

I acknowledge that I have received and read a copy of this Code of Conduct and understand that I am responsible for knowing and abiding by its requirements. I understand that the requirements in this Policy must be followed by all persons working for the InterOcean to ensure that our business activities are conducted in accordance with our general principles and standards of integrity. I understand that it is InterOcean's policy to act professionally, fairly and with integrity at all times.

Signed

Print Name ENTER NAME

Date CHOOSE DATE