

# Oceanscan Group Global Supplier Code of Conduct

## 1. Introduction

The Oceanscan Group is committed to high ethical standards and conducting business with honesty, integrity and in compliance with all applicable laws and regulations.

Honesty and Integrity are the corner stones of our business model and we expect business partners, including suppliers of all goods and services (Suppliers) to conduct business to the same high standards and share our values.

We work with Suppliers globally to ensure that we can deliver the best possible products and services to our clients. We expect our Suppliers to comply with all applicable laws and regulations in the countries in which we do business.

Oceanscan Group is committed to preventing bribery and corruption and aims to foster a culture in which bribery and corruption is not acceptable.

This Supplier Code of Conduct sets out our expectations for our Suppliers. Failure to comply with this policy may result in termination of the relationship or cancelled orders.

## 2. How to report a concern or a breach of conduct

Suppliers will ensure Oceanscan HQ is informed of any violations, including accidental violations by the Supplier to ensure appropriate remedial action can be initiated.

Suppliers or individuals may raise concerns regarding potential violations of this code by Suppliers or violations of our Code of Conduct by an Oceanscan Group employee or any other ethical or compliance issue.

Oceanscan Group commits never to retaliate against Suppliers for making a good faith report of a potential, suspected or actual breach of the law, our Code of Conduct or the Supplier Code of Conduct.

Reports can be made via our website.

[www.oceanscan.co.uk](http://www.oceanscan.co.uk)

### **3. Environmental, Health & Safety and Governance (ESG)**

Oceanscan Group believes that sustainability is the key to our continued future. In support of our commitment to social sustainability, ethical conduct and environmental responsibility we strive to ensure we only work with Suppliers who share our values and are responsible in the way they conduct their business operations.

This means that Oceanscan Group will only conduct business with Suppliers and partners that are not subject to any government-imposed sanctions or restrictions.

### **4. Health and Safety**

At Oceanscan Group safety is our highest priority. Our commitment to ensure a safe working environment is at the centre of everything we do.

Similarly, Oceanscan Group expects its Suppliers to provide their employees with a safe and healthy working environment to ensure prevention of workplace accidents and ill health.

Suppliers must take a proactive approach to health and safety by implementing policies as required, safe systems of work, training for employees and conducting risk assessments of relevant hazards in the workplace to prevent injuries and protect workers' health.

### **5. Environment**

Oceanscan Group's Suppliers should adhere to environmental laws and regulations in the areas in which they operate and make efforts to minimise their environmental impact, including resource conservation, waste reduction, and emissions control.

We encourage suppliers to adopt sustainable practices in their operations, such as reducing energy consumption, using eco-friendly materials, and promoting recycling.

### **6. Human Trafficking, Child Labour or Forced Labour, Fair Remuneration and Discrimination, Right to Work.**

Oceanscan Group's Suppliers must not use or benefit from any form of forced or involuntary labour, including child labour or human trafficking, in any part of their operations.

In addition, workers should receive fair wages, benefits, and reasonable working hours in compliance with local labour laws and industry standards.

Suppliers shall respect the rights of workers to form and join trade unions or other worker organisations as permitted by local laws.

Suppliers must not employ staff that do not have a right to work in the area in which they are employed.

## **7. Anti-discrimination, Anti-Harassment and Inclusiveness**

All employees should be treated with respect and dignity. The Suppliers shall not unlawfully discriminate based on race, colour, gender, religion, age, disability, or other protected characteristics. Suppliers should endeavour to foster an inclusive work environment where equal opportunities exist for all employees.

## **8. Anti-bribery and Anti-Money Laundering**

Suppliers are prohibited from offering or accepting any form of bribery, fraud, financial deception or money laundering. Suppliers shall not use improper influence to directly or indirectly offer, give or promise money or anything else of value. This includes gifts, meals, entertainment or other business courtesies, benefits or favours, regardless of value.

## **9. Fair Competition**

Suppliers must not engage in market manipulation and abuse or enter into anti-competitive agreements or otherwise seek to undermine normal free and fair competition. This would constitute a violation of applicable antitrust and competition laws. Suppliers information regarding their products and services must be accurate and truthful. Deliberate untrue and misleading information intended to gain a competitive advantage is strictly prohibited.

## **10. Conflicts of Interest**

Suppliers should avoid conflicts of interest and are prohibited from benefiting from insider or confidential information.

During Suppliers' dealings with Oceanscan Group, Suppliers must disclose any personal, business or other relationships or other arrangement that may be seen as a conflict of interest.

## **11. Data Protection and Privacy**

Suppliers must ensure they take all reasonable measures to ensure that protection of business computer systems, confidential information and data received from Oceanscan Group remains secure. Suppliers must protect the privacy of any information received from Oceanscan and the privacy rights of its employees.

Suppliers must ensure compliance with all applicable data protection laws and regulations such as the EU General Data Protection Regulations.

## 12. Compliance with this Supplier Code of Conduct

Oceanscan Group reserves the right to conduct monitoring of the Suppliers' compliance with this Code of Conduct. Any non-compliance will require immediate corrective action. In the event of major non-compliance of this Code of Conduct or if Oceanscan Group reasonably believes there to be a violation, Oceanscan Group will take appropriate action to protect its own business interests. This may include termination of business relationships and cancellation of contracts or orders.

## 13. Acceptance of the Supplier Code of Conduct

By agreeing to conduct business with Oceanscan Group, Suppliers accept and agree to comply with the Supplier Code of Conduct and agree that this Code of Conduct supplements any contract or agreement with Oceanscan Group.

Acceptance of any agreements or contracts with Oceanscan Group infers agreement to the Supplier Code of Conduct and as such does not require signature or return.

Signed: \_\_\_\_\_

*K.S. Hunter*

**K.S. Hunter**  
**Managing Director**

**Date: 9<sup>th</sup> October 2023**