



Supplier Code of Conduct



Introduction

SubSea Craft is committed to conducting business ethically and responsibly. This ambition can only be achieved when our business partners share this commitment.

This Supplier Code of Conduct is an integral part of any agreement between SubSea Craft and its suppliers of goods and services, including agents and professional services providers. SubSea Craft requires all suppliers to comply with this Code in full and at all times.

It establishes the standards and expectations regarding ethical conduct, compliance with applicable laws, and commitment to sustainable and responsible business practices. Adherence to the Code is essential to maintain the integrity and reputation of both SubSea Craft and its supply chain.

Suppliers must not only express their commitment to these principles but must establish and maintain robust compliance programs to proactively and demonstrably deliver on these obligations. This includes providing comprehensive training to employees and relevant stakeholders, implementing internal controls, conducting regular audits, and continuously monitoring adherence to these standards. Suppliers must provide a copy of this Code to their group companies and their own suppliers and contractors and require them to comply with the provisions of this Code that are applicable to them.

Any violation of this Code by the Supplier or identified with their supply chain must be immediately reported to SubSea Craft.

If there is any conflict between the provisions of an agreement with SubSea Craft and the provisions of this Code, the Supplier shall meet the more stringent standard.



Anti-Bribery and Corruption

Suppliers must conduct their business in an honest and ethical manner, strictly prohibiting any form of bribery, corruption, or improper influence.

The Supplier is responsible for ensuring its employees, agents, or other third parties, do not accept, offer, promise, pay, permit, or authorise, any bribe, facilitation payment, kickback, or illegal political contribution, in the form of money, gifts, goods, services, entertainment, hospitality, employment, contracts, or other things of value, in order to obtain or retain improper advantage or any other unlawful or improper payment or benefit.

Suppliers must maintain policies and procedures, to prevent, detect, and address any instances of bribery or corruption.

Anti-Trust and Competition

Suppliers are prohibited from engaging in anti-competitive arrangements or otherwise improperly restrict fair competition, in accordance with applicable antitrust laws and regulations, such as price fixing, withholding supply, or other collusive practices.

Prohibition of Tax Evasion

Suppliers must comply with all applicable tax laws and regulations. They are strictly prohibited from engaging in or facilitating any form of tax evasion or fraudulent tax practices.

Suppliers are expected to accurately report their income, expenses, and tax obligations, and to cooperate fully with relevant tax authorities.

Anti-Money Laundering

Suppliers must comply with all applicable anti-money laundering laws and regulations. Suppliers are strictly prohibited from engaging in or facilitating any form of money laundering or related criminal activities. Suppliers must implement appropriate policies, procedures, and controls to identify, prevent, and report suspicious activities, and ensure all staff are adequately trained to recognise and respond to potential money laundering risks.



Human Rights

Suppliers must respect and uphold fundamental human rights in all aspects of their operations and comply with applicable laws, regulations, and principles.

Suppliers must commit to preventing any form of discrimination, exploitation, abuse, or any violation of workers' rights.

Suppliers must implement policies and measures to prevent and mitigate the risk of such abuses from occurring.

Freedom of Association

Suppliers shall respect, and not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

Modern Slavery

Suppliers must not engage in any form of modern slavery, including forced labour, child labour, or human trafficking.

Suppliers must implement procedures and controls to actively identify, prevent, and address any instances or suspicion of modern slavery within their operations and supply chains.

Practices such as mandatory surrender of identity documents, work permits, or measures to force indentured labour or unreasonable restrict freedom of movement, are strictly prohibited.

Inclusion

Suppliers must provide a workplace that fosters a culture of inclusion where all employees are valued and enabled to contribute fully. Equal employment opportunities must be provided safe from discrimination, harassment, or bias.



Confidentiality and Data Protection

Suppliers must ensure the proper handling, processing, and storage of all personal data in accordance with applicable data protection laws and regulations, or as otherwise directly instructed by SubSea Craft.

Suppliers are responsible for implementing appropriate technical and organisational measures to safeguard personal data against unauthorised access, disclosure, alteration, or destruction.

Suppliers must maintain the confidentiality of all proprietary, confidential, and sensitive information (including intellectual property) shared or obtained during performance of their work and must not disclose or use such information for any unauthorised purpose.

Cyber and Information Security

Suppliers must implement appropriate cybersecurity measures to protect their information systems, networks, and data from unauthorised access, cyber-attacks, and other digital threats.

They are responsible for maintaining secure IT infrastructure, regularly updating software and security protocols, and ensuring the confidentiality, integrity, and availability of all data and systems involved in their operations.

Suppliers should also establish policies and procedures to detect, respond to, and recover from cybersecurity incidents, minimising the potential impact on their operations and on the confidentiality and security of all information.

Suppliers may be required to obtain verifiable cybersecurity standards such as Cyber Essentials Plus (for UK-based organisations) and/or ISO/IEC 27001.



Health and Safety

Suppliers are responsible for providing a safe, healthy, and secure working environment for all employees and workers in accordance with all applicable laws and regulations.

Suppliers must implement policies and procedures to prevent and mitigate accidents, injuries, and occupational illnesses, including risk assessments, training, providing protective equipment, and fostering a culture of safety.

Suppliers are recommended to work towards recognised standards, such as ISO 45001.

Quality

Suppliers must commit to ensuring their products and services are of a high quality and meet all standards, specifications, or assurances represented or agreed, free from defects or counterfeit goods.

Suppliers are recommended to work towards recognised standards, such as ISO 9001.

Suppliers are expected to fully comply with the SubSea Craft Supplier Quality Manual.

Environmental Protection

Suppliers must operate in a manner that aims to minimise their environmental impact and complies with all applicable environmental laws and regulations.

Suppliers must commit to implementing effective environmental management practices, including resource conservation, waste reduction, pollution prevention, and sustainable sourcing.

Suppliers are recommended to work towards recognised standards, such as ISO 14001.

Ethical and Responsible Sourcing

Suppliers must ensure that all materials, minerals, products, and services are sourced responsibly and ethically.

Suppliers should establish and implement policies, procedures, and controls to promote ethical sourcing, ensure fair treatment of workers, and detect and immediately report counterfeit parts or goods.

Trade Compliance and Sanctions

Suppliers must conduct their business in compliance with applicable trade regulations, export controls, sanctions, and customs rules.

Suppliers are responsible for establishing processes to ensure all transactions of hardware, software, technology, and services (including brokering) are fully authorised by the appropriate jurisdiction, where required obtaining all necessary licences, permits or other approvals.

Suppliers must implement measures to perform screening and due diligence checks on all third parties with which they do business, to prevent and avoid transacting directly or indirectly with any prohibited or otherwise denied entities.

If the supplier itself becomes sanctioned, this must be immediately notified to SubSea Craft.

Suppliers shall ensure that all declarations, documentation, and information provided to authorities is complete, truthful, and accurate. Suppliers shall not submit or endorse any false, deceptive, or misleading information or documents with the intent to misrepresent goods, their classification, value, origin, or other customs-related details.

Reporting of Breaches and Whistleblower Protection

The Supplier must monitor its compliance with this Code and immediately report any breaches, actual or suspected, to SubSea Craft.

The Supplier shall not retaliate or take disciplinary action against any employee or associated worker that has, in good faith, reported breaches of this Code, or any other application law or regulation.

Recordkeeping and Audit Readiness

Suppliers must comply with all regulatory recordkeeping requirements and maintain a high level of audit readiness to demonstrate their compliance when scrutinised.

Risk Management

Suppliers must take measures to proactively identify, manage, and mitigate risks within their business and supply chain that threaten their ability to supply goods and services to SubSea Craft, or risks any violation of this Code