

GLOBAL MARINE | GROUP

PROCUREMENT

SUPPLIER CODE OF CONDUCT

GMG-B-KA-0001

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1 INTRODUCTION:

The Global Marine Group is a market leader in offshore engineering and consists of two business units, Global Marine providing fibre optic cable solutions to the telecommunications and oil & gas markets, and Ocean IQ providing industry leading subsea cable data, route engineering permitting and consultancy services for telecom and power route planning projects worldwide. This combined experience and knowledge has led to significant, embedded intellectual property and an enviable track record of successful project execution.

The Group aspires to achieve its vision 'Engineering a clean and connected future'.

As a Group we are committed to ensuring our goods and services are procured objectively, with integrity and in compliance with all applicable regulations and legislation. Our expectation is that our suppliers adopt the same principles, and the Suppliers Code of Conduct sets out our expectations for our Suppliers to be responsible and ethical in the conducting of their business activities.

The Supplier Code of Conduct focuses on our basic requirements in relation to Business Ethics, Labour Practices, and the Environment.

2 LABOUR PRACTISES:

The Global Marine Group expects its suppliers to ensure that human rights are protected in the workplace and that all employees are treated fairly, equally, with dignity and respect.

Modern Slavery Act

Effective October 1st, 2015, the Modern Slavery Act requires, in part, UK businesses with a turnover of £36 million or more to publicly disclose their efforts to eradicate human trafficking and slavery, servitude and forced or compulsory labour from their supply chains. The Global Marine Group uses the International Labour Organisation (ILO) definitions of "slavery" and "forced labour".

Forced Labour

Workers shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

Recruitment Fees

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (eg: passports) is strictly prohibited. The retention of personal documents shall not be used to bind workers to employment or to restrict their freedom of movement.

Contracts Of Employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities regarding wages, working hours and other working and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour. The use or threat of physical or sexual violence, harassment, and intimidation against a worker, his or her family, or close associates, is strictly prohibited.

Workplace Equality

All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

Wages And Benefits

All workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

Working Hours

Workers shall not be forced to work more than the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary unless part of a legally recognised collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Freedom Of Movement and Personal Freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer- or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer- operated facilities shall not be made a condition of employment.

3 BUSINESS ETHICS:

The Global Marine Group has a responsibility to adhere to both legislation and best practice to ensure that all employees and Suppliers are operating to the highest professional standards. As such it is committed to complying with the UK Bribery Act and the anti-bribery laws of the countries and territories in which we do business, such as the U.S. Foreign Corrupt Practices Act.

This document outlines Global Marine Group's requirements for preventing and prohibiting bribery within the supply chain:

- The Supplier, its affiliates, subcontractors, and suppliers will comply and has or have in the past been in full compliance with the Anti-Corruption Laws and will comply with all laws, rules, and regulations applicable to it or them.
- The Supplier will notify the Global Marine Group immediately in writing if any violation or any suspicion of a violation of this Code of Conduct arises.
- The Supplier will notify its affiliates, subcontractors, and suppliers of this Code of Conduct.
- The books and records of the Supplier are complete, up to date and accurate and have not been used to in any way to disguise or otherwise attempt to conceal (i) any improper payments or (ii) any proceeds of any fraud, theft, tax evasion, or any other crime deemed to be a predicate offence to money laundering under the laws of the United Kingdom or any other applicable laws.
- The Supplier, its affiliates, subcontractors, and suppliers have not been the subject of any actual or threatened legal proceedings involving allegations of bribery or corruption.
- The Supplier legally and beneficially owns and will continue to own any bank

account into which it directs the Global marine Group to make payments pursuant to any Purchase Orders and Contracts placed.

Both the Supplier and the Global Marine Group agree that they will not, directly, or indirectly, receive from, or give or offer to give to any member of their respective companies, or to other contractors or suppliers, or to government officials or any other persons anything of material value which would be regarded as an improper inducement to any party.

4 ENVIRONMENT AND ENERGY:

Upon request from the Global Marine Group and for all delivered items to the Global Marine Group, the Supplier undertakes to provide a declaration in conformance with the ECMA-TR70 standards and to provide product information for end of life treatment as defined in the national laws implementing the European directive 2002/96/EC.

In compliance with applicable national laws on wastes from electrical and electronic equipment implementing the directive 2002/96/EC (WEEE Directive) the Supplier shall be responsible for the proper collection and recovery/recycling of waste resulting from electrical and or electronic items delivered to the Global Marine Group and will, at its own costs and expenses, collect relevant products at the Global Marine Group's premises in case of products purchased for its own use or at the customer site for products resold or integrated into items sold by the Global Marine Group and arrange for correct recycling in accordance with relevant laws.

The Global Marine Group is accredited to and in compliance with the requirements of ISO:14001 and actively encourages the Global Marine Group supply base to manage their respective businesses in accordance with these standards.

Global Marine Group is committed to reductions and efficiencies in energy usage throughout our business and supply chain.

In support, our supplier review and approval processes are partly evaluated based on energy performance, including.

- planning and processes to facilitate reduction of wasting resources.
- utilisation of transportation methods and packaging that is environmentally friendly; designing products that actively reduce energy use and consumption.

The Global Marine Group will actively engage with Suppliers to ensure effective review, documentation, implementation, and monitoring of.

- Regulatory Compliance
- HSE Planning, Management and Responsibilities
- Organisation, Accountabilities and Resources
- Risk Management

- Safety Rules and Requirements
- Incident Reporting and Management
- HSE Performance Management
- Communication, Consultation and Participation.

5 CONFLICT MATERIALS:

Global Marine Group is committed to ensure our supply chain is free from materials/minerals sourced from high-risk conflict zones. We prohibit the use of such minerals/materials within our supply network and work closely with our suppliers and regularly monitor risks to verify this commitment.

For new suppliers, as part of the approval process, our Procurement Team will request supplier documentation stating how this risk is managed within their supply network. The team will also request information on recently completed supply chain mapping exercises including the extraction and refining of raw materials.

Approved vendors are reviewed periodically to ensure provided documentation is still valid and no non-conformances have been identified. Non-conforming suppliers can be immediately removed from the Global Marine Group Approved Vendor List and blacklisted.

To ensure further adherence, Global Marine Group is reviewing the current regulations and support our vendors to adhere to the following regulation and guidance:

- Conflict Minerals European Union Regulation (for EU based suppliers importing tin, tungsten, tantalum, and gold minerals into in the EU)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas

6 EXPORT REQUIREMENTS AND SANCTIONS

The Supplier agrees to comply with all applicable national and international export control laws and regulations and shall obtain all relevant licences.

The Supplier shall notify the Global Marine Group in writing if any use, sale, import or export by the Global Marine Group of work or products to be delivered by the Supplier is restricted by any export control laws or regulations applicable to the Supplier.

The Supplier agrees to notify the Global Marine Group immediately if the Supplier or any of its affiliates, sub-contractors, suppliers of any tier is listed in any denied parties list issued by the government of the USA, the UK and/or the EU.