



The eSEA Policy



An Introduction to understanding The eSEA Policy

The eSEA Policy forms the basis for our commitment to always act ethically and with integrity, and is designed to help you make the right decisions for yourself and the Company.

The eSEA Policy applies to all employees and representatives of eSEA Group and all its subsidiaries: eSEA Advisory, ThirdEye Marine, and OceanFront, as well as anyone else acting on behalf of either of these companies, including the board of directors. We also expect that our business partners maintain the same high ethical standards.

The eSEA Policy is based on the Company's values, and together with our policies, procedures, and applicable laws and regulations; it provides a framework for what we consider responsible conduct. All employees are expected to contribute to the Company's ethical culture by understanding our policy, adhering to the Company's integrity and compliance, and avoiding violations of them.



Determining ethical decisions

All employees are expected to conduct business with integrity, transparency, and ethical commitment in dealings with customers, business partners, colleagues, and other stakeholders. Each employee must immediately report any violations of this policy, other steering documents, work rules, or any laws or regulations.

It is unacceptable for someone to be retaliated against for raising a concern in good faith.

As a member of the Company, you are expected to make the right decisions when representing the Company. Ask yourself the following questions when facing an ethical dilemma:

- Does my action comply with the law?
- Is my action in compliance with the eSEA Policy and other directive documents?
- Do I have enough information to make an informed decision? Have I consulted the available resources for advice if not?
- Do I feel comfortable justifying my actions to my co-workers, manager, friends, and family members?
- Does my action reflect well on the Company's reputation?

You must seek guidance if you are unsure or are unable to answer "yes" to these questions.



Violations of the eSEA Policy

The Company will not tolerate violations of this policy, which may result in termination, criminal prosecution, significant fines, penalties, and reputational damage.

Violations could negatively impact our relationships with customers, colleagues, regulators, business partners, and other stakeholders.



High integrity

Sustainable

Innovative



Living our values

Please take the time to read the eSEA Policy. Take it into consideration when you act and interact with others. If you suspect a violation of one of our principles, speak up. When in doubt about what our policy states, what actions are appropriate, or what your responsibilities are in upholding it, please ask for guidance.

We appreciate you taking the time to read the eSEA Policy, and for using the information found here to make the Company even better. We cannot continue to succeed without the Company's employees living our values.

How we conduct ...

... in our workplace





We contribute to a healthy and safe work environment



We have the right to STOP WORK



We do not work under the influence of alcohol and drugs



We keep our workplace free of harassment



We value diversity and equality

How we conduct ...

... in business





We act in consistency with integrity and compliance



We choose eco-friendly, and always act sustainable



We are committed to respecting human rights throughout our value chain



We do not tolerate bribery or corruption



We communicate externally with accuracy and truthfulness



We protect company assets



We are always quality-conscious



This is how we implement the Code of Conduct ...



... in our workplace

By working responsibly, acting with integrity, treating others with respect, and honoring our commitments, we build and maintain the trust of our colleagues, customers, partners, and local communities.

We contribute to a healthy and safe work environment



Our work environment should be safe, healthy, and clean. Reporting unsafe conditions and potential risks is encouraged and expected by our employees.

The health and safety of our employees is our top priority, and we do not compromise on it. Each employee has a responsibility to follow all applicable laws and regulations that are necessary to perform his or her job in a healthy and safe manner, as well as to attend all required training and courses.

All employees must know the relevant emergency procedures for their work, and report any incident or unsafe condition as soon as possible.

We have the right to STOP WORK

A STOP WORK order should be issued if an unsafe act or misconduct could result in an unfortunate outcome. Every employee has the right and duty to stop work if he or she believes it could result in an unfortunate event, regardless of position, seniority, or discipline.

The employee should not be blamed for unnecessarily utilizing STOP WORK, even if the investigation reveals that it was not needed.

With STOP WORK, timing is crucial. Should the need arise, the decision to STOP WORK should not be delayed.

STOP WORK orders must be followed until all safety aspects are removed to the satisfaction of the employee who initiated the order.



We do not work under the influence of alcohol and drugs



All employees are prohibited from using alcohol and/or drugs during work hours, in the workplace, or at any other work location (except at social functions held during work hours or in the workplace, if the use of alcohol is permitted). An employee may never consume alcohol or drugs while operating equipment or vehicles.

We keep our workplace free of harassment

The Company does not tolerate harassment or bullying of any sort. Our right to work in a safe and comfortable environment free from intimidation and harassment is fundamental. Workplace harassment comes in many forms and is experienced differently by different people; it can be physical, verbal, sexual or any combination thereof.

The act or intended act of harassment is when an individual is subjected to offensive, intimidating, hostile, degrading or humiliating negative actions or statements. In addition to actions, harassment can also be the absence of actions, such as withholding information.

In the event that you or others at work are being harassed, you have a duty to report these incidents. Speak up so that the Company can deal with the case and follow up on the parties involved. In the case of harassment, you should notify your manager, HR, or a Safety Representative.

We value diversity and equality

Discrimination is unacceptable for the Company, and we believe everyone should have equal opportunities, regardless of abilities, background or lifestyle. Everyone has the right to participate productively and successfully in the workplace, advance their career equally, and receive equal rewards and benefits.



We want diversity in the workplace regardless of race, gender, ethnicity, age, religion, sexual orientation, citizenship, mental and physical conditions, as well as other distinct differences between human beings. We believe that all employees are valuable and unique, and we should respect each unique abilities and perspectives.

This is how we implement the Code of Conduct ...



... in business

The Company is committed to complying with all applicable laws and regulations wherever we do our work. Our company interacts with a variety of stakeholders, such as customers, competitors, suppliers, business partners, media, authorities, and local communities. Throughout everything we do, we maintain ethical and legal conduct – demonstrating integrity at all times. We take the initiative and focus on solutions instead of mistakes and guilt.



We act in consistency with integrity and compliance

In addition to national laws and regulations, we expect the Company's employees to respect and observe the rules in force in the company everywhere and at all times. In this context, leaders, managers, and board members are role models, ensuring that their behavior is compliant, protecting their employees, and conducting themselves with integrity within and outside the organization.

It is imperative that all employees familiarize themselves with all applicable laws, regulations and requirements in order to conduct business properly.

The Company's representatives are responsible for adhering to the policies and procedures of external contractors and clients, as long as such policies and procedures do not violate this policy.

We protect company assets

The Company's assets should be protected and used in the intended way. The term 'assets' refers to both physical and non-physical properties, such as equipment, inventory, technology, money, intellectual property (IP), and data and information about the Company.

The assets of the Company that includes operating and work equipment must always be treated properly, carefully and protected against loss, theft, damage, and misuse. We use the equipment exclusively for company purposes. Private use can be permitted by authorized personell, provided that it is consistent with internal policies and does not disclose business secrets or entail illegal activities.

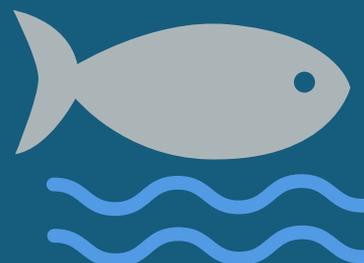
Protection of personal data is a high priority. We always record, process, and use personal data in accordance with the law, regulations, and our internal guidelines and policies.



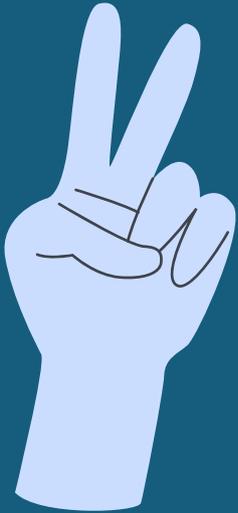
We choose eco-friendly, and always act sustainable

Our company will actively work towards reducing its climate footprint, and we will choose eco-friendly alternatives. We are taking active steps in reducing pollution and to operate more sustainable:

- We reduce waste by consuming less and in a more responsible manner. It applies to everything; food, energy, materials, equipment, travel, etc.
- We collaborate with local organizations and businesses, and support initiatives that benefit the local community. This equals less carbon emissions, and are also helping stimulating the local economy.
- We should minimize the amount of paper and other office consumables we use. For example, double-sided paper is a good practice. To the extent possible, reuse or recycle all waste, including papers, computer supplies, and redundant equipment.
- OceanFront is taking action for three UN Sustainability goals; 13 - Climate Action, 14 - Life below water, and 17 - Partnership for the goals. These three goals are implemented in Oceanfront's strategy.
- eSEA Group is certified as an ECO-Lighthouse business, which provides us with smart tools for working specifically on sustainability issues. This helps us improve our environmental performance, reduce greenhouse gas emissions, and contribute to a greener future in a systematic, and long-term way.



We are committed to respecting human rights throughout our value chain



It is our responsibility to comply with human rights, and we are committed to respecting all principles throughout our entire value chain, including our operations, supply chains, and the people and communities in areas affected by our business.

The Company will strive to only use subcontractors and suppliers who are human rights-aware and who remunerate their employees according to national laws and regulations.

The Company must conduct human rights risk assessments in areas with the highest risks of violation of human rights.

We do not tolerate bribery or corruption

The Company has a zero-tolerance policy for bribery and corruption. The company prohibits bribery in any form, whether direct or indirect. It is also prohibited for employees to solicit, arrange, or accept bribes directly or indirectly through their family members, friends, colleagues, or acquaintances.



We communicate externally with accuracy and truthfulness

We are committed to providing accurate and truthful information when communicating with suppliers, customers, business partners, media and society. This is essential for protecting our brand value and enhancing our reputation. All employees must familiarize themselves with all applicable procedures, policies and guidelines.

The employees of the Company may express their private opinions in public, but they should never imply that they are representing the company. This applies especially to social media. The only persons qualified to make public statements on behalf of the Company are those specifically authorized by the Company.

We are always quality-conscious

The Company values high integrity, innovation, and sustainability across all aspects of our work.

In order for the Company to continue to succeed, we must maintain operational excellence throughout our activities. In terms of quality, we have to be consistent in our operational processes, our service, our offerings, our attention to detail, our high standard of workmanship, and our relentless drive to improve. Continuous improvement; innovation; and growth, in a sustainable way, are essential for the Company.

Every employee is encouraged to share ideas, work processes, and best practices for the company's growth and improvement.

Our management system is aligned with ISO 9001 and ISO 14001.

