POLICY
SEVEN SEAS GROUP

SUPPLIER CODE OF BUSINESS ETHICS AND CONDUCT

1. Purpose

1.1 The purpose of the Supplier Code of Business Ethics and Conduct is to provide clear guidance to suppliers with regards to Seven Seas Group's expectations for maintaining the highest ethical standards, incorporate sustainability practices and outstanding business conduct. Seven Seas Group expects from our supplier to act legally and honestly

2. Scope

2.1 The Supplier Code of Business Ethics and Conduct applies to all supplier of Seven Seas Group.

2.2 Establish a basis for regular communication and commercial relationships.

3. References

- The Ethics & Compliance Helpline - Ethics.Helpline@sevenseasgroup.com

4. Terminology

4.1 Abbreviations

Company	Seven Seas Group
CS	Customer Services

4.2 Definition

4.2.1 Bribe: A bribe is a direct or indirect payment, offer or promise to pay or give anything of value to cause an official not to perform their duty, or to do what and a company should not do, e.g. providing a service the payor is not entitled to receive.

4.2.2 Precautionary principle: When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause-and-effect relationships are not fully established scientifically.

4.2.3 Supplier: An entity, organisation or individual providing goods or services, or acting or sourcing on behalf Seven Seas Group under a contract or otherwise, or as an agent, contractor or distributor.

4.2.4 Workforce: total number of people employed directly or indirectly by a company or an organisation

5. Responsibility and Authority

5.1 Suppliers

5.1.1 Suppliers are expected to report information about a situation that appears to you, in good faith, to be unlawful or unethical from any Seven Seas Employee.

5.1.2 Suppliers are required to acknowledge and commit to the adherence of the Supplier Code of business Ethics and Conduct.

5.1.3 Report those situations to Seven Seas Group Ethics & Compliance Helpline

5.2 Seven Seas Management Team

5.2.1 Assist and support Suppliers who raise questions or concerns in good faith about ethics and legal compliance

5.3 Ethics and Compliance Helpline

5.3.1 The Ethics and Compliance Helpline (Ethics.Helpline@sevenseasgroup.com) is responsible for providing advice to Management team regarding this code and for investigating any formal violations, if required.

5.3.2 All reports sent to the Helpline will be treated confidentially and investigated.

6. Policy

6.1 Building Trust and Credibility

6.1.1 The success of our business is dependent upon trust and confidence we give to and earn from our suppliers and employees, as well as any other person associated with the Company. We gain credibility by observing our commitments, being honest and maintaining integrity through honourable conduct.

6.2 Open and Honest Communication

6.2.1 At Seven Seas Group, every Supplier associated with the Group is entitled to feel comfortable to speak their mind when it comes to any ethical concerns.

6.2.2 We have a joint responsibility to create an open and supportive environment where our suppliers feel comfortable to raise any issues they have; the Company benefits hugely when suppliers use their knowledge to prevent mistakes and/or wrongdoing occurring.

6.2.3 The company will always investigate fully any issues raised in good faith and will not tolerate negative action towards suppliers who raise such issues.

6.3 Respect for Individuals

6.3.1 Seven Seas Group believes that all suppliers should be treated fairly and with respect. The Company has zero tolerance for discrimination and is an equal opportunity employer; we expect the same from our suppliers.

6.4 Upholding the Law

6.4.1 Laws, Regulations and Business Practices

6.4.1.1 Seven Seas Group conducts business in many different parts of the world, each governed by a different set of laws, regulations, and business practices. Our commitment to upholding integrity and good ethical standards starts with adhering to local law in all locations.

6.4.1.2 All Seven Seas Group suppliers have a responsibility to understand and follow the laws, regulations and business practices that govern the Country in which they are operating.

6.5 Sustainability practices

6.5.1 Seven Seas Group encourages suppliers to establish environmentally responsible business practices and proactively improve their environmental performance. This means conducting business in ways that respect the protection and preservation of the environment, and reduce waste, carbon emissions, and pollution

6.5.2 Seven Seas Group has a supplier audit program to assess our suppliers' compliance with this code. Those audits can be document audit, desktop audit or on-site audit

6.5.3 With the audit report, we will work with our suppliers on improvement plants to close identified gaps

6.5.4 We encourage our suppliers to integrate environmental, social and governance considerations in their operations and commit for continuous improvements to mitigate or minimise any adverse impacts on the environment and social impact.

6.6 Confidential Information and Records

6.6.1 Supplier Records

6.6.1.1 The Company collects information relating to our suppliers and subcontractors. We are a global organisation with business processes, management structures, and technical systems that may require the sharing of such information across country borders and we have worldwide data privacy policies to protect information wherever it is stored or processed.

6.6.1.2 Seven Seas Group require from our suppliers, always to protect Confidential Information and Personal Data received from the Company in accordance with applicable laws, and regulations.

6.6.1.3 Suppliers shall ensure to keep Confidential Information protected from any unauthorized access, destruction, use, modification and disclosure.

6.6.1.4 Confidential Information and Personal Data shall not be used for any purpose other than the business purposes for which they were provided or made available to the Supplier

6.6.2 Proprietary Information

6.6.2.1 Under no circumstances should any supplier solicit, acquire, use, or distribute the proprietary, confidential, or trade secret information of another company or party. There is no general applicable standard for recognizing proprietary documents, but you should at least assume that markings such as "Company Private," "Confidential," "Proprietary," "Restricted Distribution," "Internal Use," and so on, mean that the materials should not be used without prior written authorization from Seven Seas Group. Even if the materials aren't specially marked, if you have any reason to believe they are or may be proprietary, you must treat them as such.

6.6.3 Intellectual Property

6.6.3.1 Intellectual property and confidential information belonging to Seven Seas Group is also company property. Any ideas, inventions, computer programs, technical innovations, system designs, or technical enhancements that you receive while your contract with Seven Seas Group are the sole property of the Seven Seas Group and must be protected like any other form of confidential information.

6.6.4 Selective Disclosure

6.6.4.1 Selective Disclosure refers to a situation in which particular facts are communicated to a single person or limited group of people, before making them known to the required public.

6.6.4.2 The Company does not permit the selective disclosure (the act of releasing particular facts or information to a single person or limited group of people before they are due to be communicated to a larger group, the public, a customer, supplier, etc.) of any non-public information with respect to the Company, its business operations, plans, financial condition, results of operations or any development plans.

6.7 Anti-Exploitation

6.7.1 Seven Seas Group is committed to creating and sustaining a working environment where workers are treated with dignity and respect. We expect from our suppliers to adopt and enforce similar workplace practices

6.7.2 Anti-exploitation includes, but is not limited to:

- Human Trafficking
- Child Labour
- Forced Labour
- Commercial Sex Acts

6.7.3 Seven Seas refuses to engage with suppliers that have or have had activity related to such acts and upholds this standard globally (across all countries of operation) and without exception.

6.8 Avoiding Conflicts of Interest

6.8.1 A conflict of interest arises when your own personal interests, or those of people close to you, conflict with the impartial performance of your professional duties. This covers both perceived and/or actual conflicts of interest.

6.9 Gifts, Entertainment and Anti-Bribery

6.9.1 Sending Business Courtesies

6.9.1.1 No supplier is permitted to offer any business courtesy (including offers of gifts and entertainment) that could be reasonably interpreted as a bribe or an attempt to gain unfair advantage, or if it reflects negatively on the Company.

6.9.2 Supplier Selections

6.9.2.1 Suppliers competing for our business must have confidence in the fairness of our selection process. In our process, we gather and weigh the facts to determine who will best suit our needs. If you participate in supplier selection, you must have an impartial approach, regardless of the size of the purchase or its importance to the business.

6.10 Theft and Fraud

6.10.1 Seven Seas Group will not tolerate any theft or fraud by any supplier. Fraud is an act or intent to cheat, trick, steal, deceive, or lie. Fraud is an act of dishonesty and, in most cases, is a criminal act. Intentional acts of fraud are treated very seriously and will be subject to strict action including termination of contract and possible further legal recourse. Some examples of fraud include:

- Submitting false invoices
- Acts of bribes
- Unauthorized handling or reporting of transactions.

7. Monitoring and Evaluation

7.1.1 The operation of this Policy will be monitored and a review conducted at the end of every 12-month period. The Ethics & Compliance Helpline will be responsible for initiating the review.

SIGNED for and on behalf of Supplier by its authorized representative:

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Signed

_____

Name

_____

Title