

## **VentOcean Code of Conduct**

At **VentOcean**, we are committed to upholding the highest standards of ethical conduct in all aspects of our business, from internal practices to interactions with our stakeholders. This Code of Conduct outlines our shared values and expectations, which guide us in every decision we make and in every action we take. We expect all employees, partners, and stakeholders to adhere to these principles.

### **1. Integrity and Ethics**

#### **Fraud and Corruption**

VentOcean maintains a zero-tolerance policy toward fraud, bribery, corruption, and influence peddling. We strictly prohibit any form of corruption, including:

- Offering or receiving benefits or payments to influence actions or decisions.
- Engaging in any activity that violates antitrust or competition laws.

We are committed to complying with all relevant laws and regulations and expect all stakeholders to do the same. Any violations will result in severe disciplinary action, including potential legal consequences.

#### **Conflict of Interest**

We require all employees to report any conflicts of interest, whether actual or perceived, and to avoid situations where personal interests may conflict with the interests of the company. Employees must not engage in outside business activities or acquire interests in competitors, suppliers, or customers without prior approval.

#### **Insider Trading**

Employees are prohibited from using privileged or confidential information for personal gain, especially when buying or selling stocks or securities.

#### **Respect for Confidentiality**

We respect the confidentiality of all proprietary, sensitive, and personal information. Employees must protect trade secrets, client data, and any information that could be considered confidential or proprietary.

### **2. Respect for Human Rights**

#### **Human Rights in the Workplace**



VentOcean ensures that our working environment is free from forced labor, child labor, discrimination, and harassment. We promote a culture of respect for all individuals and ensure all employees can freely associate and engage in collective bargaining.

### **Supplier and Partner Expectations**

We require all our suppliers and partners to comply with our standards for ethical conduct, which include respecting human rights, fair labor practices, and a commitment to sustainable environmental practices. We conduct regular audits to ensure compliance with these standards.

### **Community Impact**

VentOcean is committed to respecting the rights and way of life of local communities. We actively engage with stakeholders to understand and mitigate any potential negative impact our operations may have. We also provide mechanisms for local communities to voice grievances, especially vulnerable groups, and ensure transparent and constructive dialogue.

### **Security and Human Rights**

We ensure that any security services employed by VentOcean, whether public or private, are properly trained and adhere to human rights principles. We monitor and report any incidents to ensure compliance with these standards.

## **3. Employee Welfare**

### **Personal Health and Safety**

We prioritize the health and safety of our employees, providing the necessary training and resources to ensure that all work environments are safe and conducive to wellbeing. Employees are encouraged to support each other in maintaining high standards of health and safety.

### **Freedom of Association and Collective Bargaining**

VentOcean respects the right of all employees to freely associate and engage in collective bargaining without fear of retaliation or discrimination.

### **Diversity and Equal Opportunity**

We are committed to promoting diversity within the company, hiring individuals based on their skills, qualifications, and merit. We do not discriminate based on gender, age, disability, ethnicity, sexual orientation, or any other personal characteristic.

## **4. Communication and Reporting**

### **Openness and Transparency**

At VentOcean, we encourage a culture of transparency. Employees are encouraged to raise concerns or ask for guidance on ethical matters, and we ensure that concerns are addressed promptly and confidentially.

### **Reporting Violations**

If you suspect any violation of this Code of Conduct or have concerns about any activity, you can:

- Speak with your line manager.
- Contact Human Resources or the Ethics Officer.
- Report concerns to the Ethics Committee via **ethics@ventocean.com**.

We protect employees who report concerns in good faith and ensure that no reprisals will occur for reporting violations.

### **Whistleblower Protection**

We provide a safe, confidential, and accessible channel for employees to report unethical behavior without fear of retaliation. All reports will be treated with the utmost confidentiality.

## **5. Business Integrity and Responsibility**

### **Commitment to Ethical Business Practices**

We hold ourselves accountable for adhering to the highest standards of business integrity. We expect our suppliers, contractors, and business partners to comply with the same ethical standards, particularly concerning safety, environmental responsibility, and business integrity.

### **Environment and Health**

VentOcean is committed to minimizing its environmental impact. We actively promote responsible resource use, sustainable practices, and ensure compliance with all applicable environmental regulations. Protecting the health of our employees, stakeholders, and the planet is at the core of our business operations.

### **Stakeholder Engagement**

We maintain open lines of communication with all stakeholders, including customers, employees, partners, and local communities. VentOcean is committed to addressing stakeholder concerns and contributing positively to the development of the communities in which we operate.

## **6. Ethics Committee**

The **VentOcean Ethics Committee** is responsible for ensuring compliance with this Code of Conduct and providing guidance on ethical matters. The committee oversees ethics training, investigates reports of unethical behavior, and makes recommendations for improvements in our ethical practices.

The Ethics Committee ensures that any potential ethical concerns are addressed, and employees receive the support they need in navigating complex ethical situations.

## **7. Continuous Improvement and Compliance**

VentOcean is committed to continuous improvement in its ethical practices. We provide training for employees, evaluate our policies regularly, and encourage feedback on how to improve compliance with our Code of Conduct. By adhering to these standards, we help create a positive and sustainable impact on our business, employees, communities, and environment.

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