

OneOcean Customer & Supplier Code of Conduct – 1st February 2021

1. Introduction

- 1.1 This Code of Conduct sets out the ethical standards under which OneOcean agrees to enter into a business relationship with its Customers and its Suppliers. It forms an integral part of the OneOcean General Terms and Conditions and is applies to each Customers use of the OneOcean Services and Applications.
- 1.2 OneOcean is committed to the highest ethical standards in the conduct of its business and in its relationships with its business partners. The aim of the Code of Conduct is to ensure that OneOcean's business partners conduct their business in an ethical and legally compliant manner.
- 1.3 This policy is subject to periodic revision by OneOcean to reflect changes in applicable law, its services, customer or supplier behaviour, prevailing market conditions or changes in the agreements OneOcean may have entered into with third parties. It is recommended that you check this policy often for changes that may impact your use or provision of goods, Services or Applications.

2. Bribery and Corruption

- 2.1 OneOcean will not accept any conduct which could constitute bribery and corruption and expects all organisations with whom we have business dealings to adopt an equivalent standard.
- 2.2 You agree to comply with all applicable laws, statutes, ordinances or other legally binding regulations relating to anti-bribery and anti-corruption, including but not limited to the UK Bribery Act 2010, the US Federal Corrupt Practices Act and any equivalent legislation in the jurisdictions in which you operate. Throughout the term of your agreement with OneOcean you will have effective policies and procedures, which will be provided to us on request, including adequate procedures under the UK Bribery Act 2010, and will enforce them appropriately.
- 2.3 You will notify us if you have reason to believe that you or any person associated with you has accepted or demanded any undue financial or other advantage in connection with the performance of your agreement with us.

3. Modern Slavery and Human Trafficking

- 3.1 OneOcean is committed to the elimination of slavery, servitude and forced or compulsory labour and human trafficking and will not tolerate actions or conduct that supports such activities anywhere in its supply chain.
- 3.2 You agree to comply with all applicable laws, statutes, ordinances or other legally binding regulations relating to slavery, servitude and forced or compulsory labour and human trafficking, including the UK Modern Slavery Act 2015 and other equivalent legislation in the country in which you operate, and have in place throughout the term of your Agreement effective policies and procedures, which you will provide to us on request, to ensure your compliance, and will enforce them where appropriate.

4. Tax Evasion

- 4.1 You will not engage in any activity, practice or conduct which would constitute either a UK or a foreign tax evasion facilitation offence under sections 45 (1) and 46 (1) of the UK Criminal Finances Act 2017 or any equivalent local law in the jurisdiction where services are being provided by, or to, OneOcean.
- 4.2 You will promptly notify us of any request or demand from a third party to facilitate the evasion of tax within the meaning of Part 3 of the UK Criminal Finances Act 2017 or any equivalent under local law in connection with the performance of your Agreement with OneOcean.

5. Harassment and Discrimination

- 5.1 OneOcean is committed to fostering a culture of treating all parties with dignity and respect. This includes promoting the elimination of unlawful and unfair discrimination in the workplace, on any grounds including grounds of age, disability, marital status, pregnancy and maternity, religion or belief, gender, sexual orientation or race including nationality and ethnic origins.
- 5.2 OneOcean is also committed to a policy of creating a work environment free from harassment. We expect all organisations with whom we have business dealings to adopt the same approach. Behaviour, actions or words that transgress our policy are unacceptable.
- 5.3 During the course of your relationship with OneOcean you will have your own policies and procedures, which will be provided on request, that comply with these principles and the relevant legal requirements in the jurisdictions in which you operate, and that you will enforce them appropriately.

6. Notifications

- 6.1 You will promptly notify OneOcean of any actual or suspected violations of this Code of Conduct.
- 6.2 Please address any notifications required under this Code of Conduct or any other questions or concerns to:

Sam Samra
Chief Operating Officer
OneOcean Group Limited,
Unit 4, Voltage, Mollison Avenue,
Enfield, EN3 7XQ, UK

- 6.3 If you are in breach of this code OneOcean reserves the right to temporarily suspend your access to the Application or Service without notice and/or terminate your Agreement with OneOcean. Notwithstanding any obligations to the contrary OneOcean reserves the right to report any violations of this policy to an appropriate regulatory or law enforcement agency.