

# Code of Conduct





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# Message from the CEO

Dear Colleagues,

At Anglo-Eastern, our values are embedded in our culture and this leads our company. Our long-term success is dependent on our integrity. Every day, our many stakeholders around the world - be they customers, business partners, shareholders, regulators, crew, employees - count on our commitment to the highest standards of business ethics and compliance.



By living up to our values and high ethical standards, we ensure that our company will be positioned to flourish for years to come. Whatever your role at Anglo-Eastern, the judgements you make reflect on our reputation and are critical to our success. I am counting on your commitment to embrace and drive a culture in which we continue to grow our business consistent with our values and, of course, legal requirements.

We all recognise that our heavily regulated industry is constantly changing, and that in many cases, the rules are complex and strictly enforced. For these reasons, I encourage every crew member and employee to ask questions and raise concerns at the time they arise to ensure that we are always comfortable with our conduct.

Furthermore, we believe that our reputation speaks for itself and we endeavour to maintain that level of integrity through honest and ethical personal and business practices. A company either earns the right to keep operating or it doesn't - it's just that simple in the business world.

**Leading with Integrity** is our promise, our purpose. It's what sets us apart. Please take the time to read and understand our Code of Conduct, and ensure you are conducting Anglo-Eastern's business accordingly. Our sustainability and continued success depends on it, and we will be a stronger, more competitive company as a result.

Thank you in advance for your compliance.

**Capt. Bjorn Hojgaard**  
Chief Executive Officer  
Anglo-Eastern Univan Group



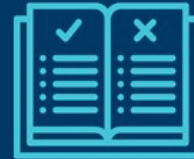


To remain at the top of your game and grow your career with us, there are minimum standards we expect each and every one of our seafarers to follow as a member of the Anglo-Eastern family.

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### **RULES | Respect rules and regulations**

This includes company rules, policies, systems and procedures, plus industry regulations and the law.



### **ENVIRONMENT | Respect the environment**

Comply with MARPOL and lead by example, both at work and in your private lives. Educate others.



### **SAFETY | Respect the safety and health of all**

Abide by our D&A Policy, rest as required, follow all safety procedures and don't cut corners.



### **PROPERTY | Respect people's property**

Do not commit theft, sabotage or fraud, or breaches of confidentiality or privacy. Information is also property.



### **EXCELLENCE | Respect our quality standards**

We employ the best, so that we can be the best., as evidenced by our reputation. Let's work to uphold it.



### **COLLEAGUES | Respect your colleagues**

Do not assault, bully, harass or humiliate your colleagues in person or online. We are one family.



### **TAKE ACTION | Respect your duty of care**

Speak up, intervene when it's safe to do so, and report violations according to company protocol.



We are proud to count you amongst our seafaring family and trust you are proud to be a part of it. Show us by leading with integrity and **RESPECT**.



**Our Values**



# Leading with Integrity

## OUR PROMISE

Anglo-Eastern leads by doing the right things the right way. We enable everyone to perform at their best, while challenging ourselves to responsibly shape the industry and make a positive impact in our communities.

## OUR PURPOSE

We are here to build trust, drive performance and shape a better maritime future.





# Setting the Standard

## OUR VALUES

### Nurturing our people and communities

We have an unwavering commitment to the ongoing growth and success of our people, and the communities that depend on us.

### Courage to do what's right

We take ownership for all outcomes and stand firmly for what we believe in, even when we have to make tough calls. We engage in open, honest dialogue to meet our stakeholders' needs.

### Progressively setting the standard

We look beyond the status quo and always strive to be the best we can be. We seek the latest knowledge and skills to set standards and deliver results.





# Seafarers with Passion

## OUR PERSONALITY

**Spirited** | We're natural leaders, inspiring others with our passion and conviction. You can feel our energy.

**Genuine** | We're down-to-earth and straightforward. What you see is what you get.

**Practical** | We're resourceful, hands-on people. We keep our cool and use common sense in difficult situations.

**Empathetic** | We're open, personable and warm. We're always understanding and easy to relate to.







**Our People**



# Human Rights

- We conduct our business in a socially responsible and ethical manner that respects the human rights and dignity of all people, in compliance with all legal requirements and applicable conventions, and expect the same of our partners and vendors.
- We uphold internationally recognised human rights, as set out in the UN Guiding Principles on Business and Human Rights, as well as the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- We treat everyone in our employment equally, fairly, and without discrimination. Our crew and employees are entitled to work in an environment and conditions that respect their human rights, personal health and safety, and dignity.
- We respect freedom of association and collective bargaining.
- Working for Anglo-Eastern is a choice. We do not use any form of forced labour (e.g., slave, prison, indentured, bonded, other), child labour, or human trafficking in our operations.
- This includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.



# Health and Safety

- Anglo-Eastern is a people business. The health and safety of our crew and employees are paramount.
- We place equal importance on physical and mental health, providing medical coverage, support, and access to outreach services ashore and at sea, and are certified to **ISO 45001 Occupational Health and Safety Management** standards.
- We expect our crew and employees to take responsibility for their own health and safety, to ensure they are fit for work, and to perform their duties safely and responsibly at all times.
- Our company policies aim for 100% compliance and zero injuries, casualties and accidents.
- Our Quality, Health, Safety and Environment (QHSE) division manages ongoing health and safety training, programmes, and campaigns that go beyond minimum regulatory compliance.
- Crew and employees are required to report any dangerous or unsafe acts, decisions, or situations observed on the job or in the workplace that could jeopardise health and safety.
- Anglo-Eastern is a founding signatory of the Global Maritime Forum's Neptune Declaration on Seafarer Wellbeing and Crew Change, and BIMCO's Gulf of Guinea Declaration on Suppression of Piracy.







# Equal Opportunity

- Anglo-Eastern is an equal opportunity employer. We welcome skilled talent from all backgrounds.
- We value diversity and provide an inclusive environment for our people, regardless of their race, ethnicity, nationality, gender, age, sexual orientation, faith or political beliefs.
- Our crew and employees are expected to treat each other with respect and professionalism. There is no room for workplace bullying, intimidation or harassment of any kind.
- We value individuality and teamwork, new ideas and differences of opinion, and encourage our crew and employees to speak up and let us know how we are doing.
- We operate a global network of over 25 offices across five continents, supported by a multicultural workforce and diverse crew comprising Indians, Filipinos, Chinese, Ukrainians and Latvians, amongst many other nationalities.
- We are the largest employer of female seafarers in India, the employer of Hong Kong's first female chief engineer, and took the lead in jointly publishing an industry booklet on gender diversity and inclusion in collaboration with ICS, ISWAN and WISTA.



# Training and Development

- Anglo-Eastern is committed to training and developing our people for their ongoing growth, success and continuous improvement, as well as that of the company. We believe in equipping our crew and employees with the necessary skills and knowledge to be the best they can be in their jobs.
- We have a network of strategically located Anglo-Eastern Maritime Training Centres (AEMTCs) for the training, certification and continuous upskilling of our crew, regardless of rank.
- Our cadet training institution, Anglo-Eastern Maritime Academy (AEMA), is renowned for its maritime training and education, campus facilities and quality cadets, who are assigned to Anglo-Eastern managed vessels upon graduation.
- Employees are encouraged to undertake training for their further development. We also support the career growth of our employees through promotions, lateral or divisional transfers, and other internal mobility opportunities within the group.



# UN Sustainable Development Goals







**Our Communities**



# Social Responsibility

- Anglo-Eastern supports the tenets of the UN Sustainable Development Goals, and believes in corporate social responsibility and the importance of giving back to society.
- In communities where we have a strong presence, we undertake charity work and other community initiatives to engage and support those in need, in addition to contributing to worthy causes.
- Across India, Anglo-Eastern guides, supports and helps fund Anavi, a volunteer network run by our crew members' spouses. Together, the chapters oversee charitable donations and renovation works for orphanages, schools for underprivileged children, homes for the elderly and physically challenged, hospitals, and NGOs, many of which we have a long-standing history of supporting.
- We foster strong relationships with government authorities, chambers of commerce, industry associations, professional bodies, NGOs, and other groups through active participation, cooperation and collaboration.



# Environmental Stewardship

- Anglo-Eastern respects and values our environment, oceans and biodiversity, championing clean and sustainable ways to take the industry forwards.
- We believe in marine and environmental stewardship, and are deeply committed to protecting our oceans and sea life through education and responsible shipping. This includes adopting cleaner fuels, practices and technologies, as well as ensuring strict regulatory compliance, supply chain involvement, and community engagement.
- We are proud adherents of MARPOL and are certified to **ISO 14001 Environmental Management** standards.
- A significant portion of our vessels are QUALSHIP 21-certified by the United States Coast Guard, with a growing number of these vessels having also attained additional E-Zero status.
- We continue to educate our crew, employees and other stakeholders about the need to reduce plastic waste and follow the 4Rs of reduce, reuse, recycle and rethink in the hopes of one day achieving plastic-free oceans for future generations to enjoy.







# Sustainability

- Anglo-Eastern is a strong and vocal advocate of climate action, decarbonisation and sustainability, as part of our aspirational goal to shape a better future, both maritime and general.
- We have been a member of the Global Maritime Forum's Getting to Zero Coalition since its inception in 2019, and our group-wide shore operations have been certified carbon-neutral since 2020 in accordance with **PAS 2060** standards.
- We are a member of a joint study framework aimed at advancing ammonia as an alternative marine fuel and have partnered with other like-minded organisations to help drive decarbonisation and sustainability.
- Through our naval architecture division, Anglo-Eastern Technical Services (AETS), we have collaborated with shipowners on numerous retrofit projects and novel vessel designs aimed at reducing or eliminating emissions.
- We continue to advise and support shipowners in matters relating to compliance with forthcoming emissions regulations, and have conducted numerous new and existing vessel reviews, offering lifecycle sustainability assessments, alternative fuel technologies, and options for optimisation.



**Our Business**



# Governance and Compliance

- Anglo-Eastern is a law-abiding corporate citizen. We respect and adhere to the laws and regulations of all relevant jurisdictions and foster lasting relationships with government authorities wherever we operate.
- We support and uphold the UN Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and abide by all relevant labour and employment laws.
- We comply with the rules, regulations and standards required by such industry bodies as IMO, BIMCO and INTERTANKO, amongst others, often going above and beyond the minimum requirements.
- All of our offices and managed vessels are regularly audited by both internal and external parties to ensure proper governance and compliance.
- Our internal auditing team comprises master mariners and chief engineers who are responsible for conducting onboard audits of our fleet on an annual basis.
- We are certified to **ISO 9001 Quality Management** standards.

COMPLIANCE

RULES  
passwords  
POLICY  
BACKUP  
LAW  
RULES<sup>20</sup>  
recovery

process  
REPORT

standards  
access

RISK

REGULATIONS

MANAGEMENT

POLICY

penetration

control

REGULATIONS

RULES





# Business Conduct

- Anglo-Eastern subscribes to ethical business practices. We do the right things the right way and take ownership for all outcomes.
- We use good judgement to avoid conflicts of interest and seek guidance in unclear situations.
- Our people are prohibited from seeking personal gains, favours or other benefits through their position or association with Anglo-Eastern, including access to insider information.
- We believe and engage only in free and fair competition that is ethical and in compliance with relevant competition and anti-trust laws, as well as international sanctions.
- We have a zero-tolerance policy towards bribery, corruption and money laundering, as set out in our Anti-corruption Policy and Anti-bribery and Corruption Guidelines.
- Any policy breaches will result in internal disciplinary action, including but not limited to summary dismissal. Where laws are breached, we will cooperate with the local authorities.
- We have in place a Sanctions Compliance Policy to ensure we do not contravene international sanctions.





# Communications and Privacy

- Anglo-Eastern engages in open and honest dialogue to meet the needs of our various stakeholders.
- We believe in transparency and disclosure, whilst remaining mindful of confidential information and data privacy.
- Data security and recovery are a top priority. We are certified to **ISO 27001 Information Security Management** standards and are internally governed by our Information Security Policy, with regular cybersecurity training required for all employees.
- We safeguard all data entrusted to us and ensure that any confidential information is treated as such.
- We do not condone or tolerate the use of confidential information for insider trading and personal gain.
- We take our data privacy obligations seriously, including the EU General Data Protection Regulation (GDPR).
- Personal data are only used for the purpose(s) for which such data were given. We do not sell or otherwise market personal data to third-parties.
- Social media usage by our crew and employees is governed by our Social Media Policy.



# Supply Chain

- Anglo-Eastern is a partner organisation of IMPA ACT. We endorse the IMPA ACT Supplier Code of Conduct and are fully committed to the principles and best practices it sets out, both as a supplier of services and as a recipient of goods and services.
- The suppliers and service providers whom we choose to work with reflect who we are as a company, so it is important that such business partners be of the same or similar standing and mindset.
- Our suppliers and service providers are thus expected to understand and respect our policies, guidelines and values, as set out in this Code of Conduct.
- To help shape a better, more sustainable maritime future, we also expect our supply chain partners to similarly adhere to the IMPA ACT Supplier Code of Conduct, and are actively engaging and collaborating with them in this regard.
- We will not knowingly conduct business with a supplier or service provider, or any business partner, that wilfully engages in illegal or unfair practices relating to human rights, labour, employment, competition, business and/or the environment.



# Note to Suppliers

- As part of our mission to combat plastic pollution, we oppose the unnecessary use of plastics in packaging and packing materials.
- Suppliers are encouraged to minimise their plastic footprint in their dealings with us by: (a) reducing the use of unnecessary plastics; and (b) seeking eco-friendly alternatives where possible (e.g., paper, cardboard, biodegradable materials, air pillows).

## Sustainable Packaging Guidelines

For reference only.

Source: APCO



Design for recovery



Provide consumer information on sustainability



Optimise material efficiency



Design to reduce product waste



Eliminate hazardous materials



Use recycled materials



Use of renewable materials



Design to minimise litter



Design for transport efficiency



Design for accessibility

- Where plastic is unavoidable, recycled plastics are preferred, or the option for the supplier to collect and reuse the plastic packing materials where this is a feasible option.





# Our Policies





# Policies and Guidelines

Supporting company policies and guidelines for the preceding sections include:

## POLICIES

- Anti-corruption
- Business Ethics
- Sanctions Compliance
- Control of Arms
- Security
- Information Security
- Maintenance and Spare Parts
- Quality, Health, Safety and Environment (QHSE)
- Personnel Recruitment and Training
- Cultural Awareness (diversity policy)
- Prevention of Sexual Harassment
- Drug and Alcohol
- Social Media

## GUIDELINES

- Anti-bribery and Corruption
- Workplace Safety
- Personal Protective and Safety Equipment
- Tools and Equipment to Prevent Injuries On Board
- Safe Lifting
- Heat Stress Management
- Managing Fatigue
- Suicide Prevention
- Gender Diversity (external collaboration)
- Competency Assessment
- Appraisals



# Programmes and Campaigns

Supporting company programmes, campaigns and other initiatives for the preceding sections include:

## PROGRAMMES & CAMPAIGNS

- “Speak Up” programme
- “I Listen” programme
- “Go Home Safe” programme
- “Focus Area” campaign
- “Core Values” for vessel managers and auditors
- “Lookout” bulletin
- “PSC Newsletter” bulletin
- “LeaderShip” magazine

## COVID-19

- Standard Infection Control Precautions
- Precautions for Visitors and Contractors

## SAFETY CARDS

- Golden Rules for Personal Safety
- Golden Rules for Preventing Vessel Blackouts
- One-Minute Hazard Identification Guide
- Collision Avoidance / Berthing / Anchoring
- Common PSC Detainable Deficiencies
- Safety Card for Contractors
- Ladder Safety
- Be Safe+





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