



**SABIK OFFSHORE**

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# SABIK OFFSHORE CODE OF CONDUCT

Our commitment as a responsible business.  
A guide for our employees, our suppliers & their employees.

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# A COMMITMENT & OUR PHILOSOPHY

## INTRODUCTION

Sabik Offshores' Code of Conduct is our commitment to conducting responsible business with integrity in all actions. It is also a guide to our employees, our suppliers and their employees in making ethical decisions and follow ethical practices at work. We believe that conducting business in a conscientious and responsible manner contributes to our competitive advantage and creates benefits for our customers.

As a responsible business provider, Sabik Offshore strongly believes that it is of the highest importance that all the business contributors (both our own working staff and suppliers), who take part in manufacturing and delivering products and services, are treated with dignity and respect, have good and safe working conditions, and are only exposed to environmentally sound processes.

We are all responsible for maintaining ethical working relationships and practices. We expect that our employees and suppliers will follow the principles of our Code of Conduct and ensure that their production and sub-suppliers do the same. The intention of maintaining this Code of Conduct is to initiate a constructive dialogue with our employees and business suppliers, to achieve mutual benefits for both parties.

# LEGAL COMPLIANCE

We, our suppliers and their sub-suppliers must comply with all applicable national laws, regulations and industry standards. In case of a conflict between national law and Sabik Offshore's Code of Conduct, an employee or a supplier should consult with Sabik Offshore immediately.

Suppliers are fully responsible for implementing all necessary actions to comply with requirements related to our Code of Conduct. If an employee or a supplier is suspected of non-compliance with the Code, we expect to take immediate action to correct the issues.

For severe violations of the Code or missing willingness to correct non-compliance; we reserve the right to take action including and up to dissolving the cooperation with Supplier. In such a case, where a termination for cause of Supplier is considered, the Supplier is not entitled to any kind of compensation.



# LABOR RIGHTS & HUMAN RIGHTS



## FORCED LABOR

We, our suppliers, or any entity supplying labor to the Supplier, must not participate in, or benefit from, any source of forced, bonded or indentured labor, or human trafficking. Workers shall be allowed to move around freely and leave their place of work when their shift ends. Sabik Offshore does not tolerate employment which confines the employee in debt bondage, e.g., through fee-charging employment agencies or other practices which could limit employees from freely ending their employment.



## NON-DISCRIMINATION

We and our suppliers will not engage in or support discrimination based on race, color, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, disability or other distinguishing characteristics. All employment-related decisions such as hiring, remuneration, benefits, training, advancement, discipline, termination and retirement shall be based only on relevant objective criteria.



## RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We and our suppliers respect the rights of employees to associate freely and join (or not join) workers' organizations of their own choice. There shall be no dismissals, discrimination, harassment, or intimidation due to association or union.



## CHILD LABOR AND MINIMUM AGE REQUIREMENTS

We will not and our suppliers must not use or benefit from child labor and in all circumstances the minimum age of employment must follow the ILO conventions and national regulations.



## WAGES, WORKING HOURS & EMPLOYMENT CONDITIONS

We will and our suppliers must comply with all local laws and regulations regarding wages, overtime wages, sick leave and other elements of compensation. Following international labor standards and safeguarding the health and safety of employees, the maximum allowable working hours in a week must not on a regular basis exceed 48 hours with a maximum of 60 effective hours per week, including overtime, however, excluding lunch and breaks, or less if dictated by national law. Under no circumstances can the work week exceed the maximum permitted under local laws or regulations. Workers shall be entitled to at least one day off in every seven-day period.



# HEALTH & SAFETY

We will and our suppliers must provide safe and healthy working conditions and protect employees from hazards and dangers in the workplace. All employees of suppliers must follow the health and safety policies and procedures outlined by the supplier. These procedures must always be in compliance with applicable laws and regulations as well as follow requirements from standard ISO 45001.

As a minimum of Health and Safety requirements, the supplier shall ensure to comply with:

- Workers must not be exposed to dangerous work without the provision of appropriate personal protective equipment & instruction in its proper use.
- Facilities must comply with applicable laws and rules about construction safety as well as fire protection and fire alarms.
- All dangerous materials must be stored in safe places and used in safe and controlled ways.
- Production machines and tools must be properly maintained and shielded.
- All working areas must provide appropriate lighting and ventilation.
- Dedicated areas for meals, resting and sleeping, must be kept clean and safe.



# ENVIRONMENT, SUSTAINABILITY & GOVERNANCE

**We will and our suppliers must maintain awareness of current environmental legislation and ensure legal compliance through training, awareness, operational control and monitoring.**

## **We will all:**

- Work systematically to prevent adverse environmental impacts from its activities, products and services by means of a proactive approach and responsible management.
- Report all environmental impacts as required by local law and strive to make continuous improvements to reduce this impact throughout its manufacturing processes.
- Develop and implement effective environmental management systems that support identifying risks, measuring, and monitoring performance as much as driving continuous improvements to minimize environmental impact connected with Suppliers activity.
- Continuously develop and promote environmentally friendly technologies, solutions, and processes within own operation and towards their supply chain.
- Proactively commit to initiatives which could limit impact to environment.

## **As minimum requirements Suppliers shall:**

- Actively avoid pollution and actively strive to reduce material consumption.
- Responsibly handle all Chemicals and Hazardous materials, store and dispose of in an environmentally safe way and as required by local law and regulations.
- Ensure that all air emissions, wastewater as well as solid waste are to be characterized, monitored, controlled and treated as required by all demand by law.
- Contribute to the recycling and reuse of materials and products to the extent possible.

Besides complying with the applicable environmental regulations, Suppliers shall also endeavor to manage their business in a way, that is sustainable and environmentally friendly. A sustainable business approach means that suppliers are aware of many different aspects such as dealing responsibly with all natural resources, use materials from responsible and proven sources.

We also expect our suppliers to consider, calculate and target the reduction of Greenhouse Gas Emissions, as an important factor of their business activity. We would like to receive from suppliers' information about emissions and goals, upon request.



# BUSINESS ETHICS, CORRUPTION & **BRIBERY**

Corruption and bribery are recognized as barriers to sustainable development and free trade. Our employees and our suppliers must never engage in any form of bribery, corruption, extortion or embezzlement, or any illegal method to influence public officials, the judiciary, or private parties.

## Our basic principals are:

- Not pay bribes - this also applies to third parties and Suppliers' sub-suppliers.
- Not make facilitation payments (payment to speed up processes).
- Not offer or accept excessive gifts, hospitality, or entertainment.
- Not participate in price-fixing, market or customer allocation, market sharing or bid rigging with competitors.
- Shall avoid conflicts of interest that may adversely influence business relationships.
- New contracts with agents, intermediaries and consultants shall include a section on anti-corruption. The contract holder must comply with all applicable laws and regulations as Suppliers are required to under this Code of Conduct.



## DATA SECURITY & PRIVACY

We will and our suppliers must follow all legal requirements for data protection and to remain committed to protect the rights and privacy of all individuals according to the European General Data Protection Regulation (GDPR).



## SUPPLY CHAIN INTEGRITY

We will and our suppliers must maintain a suitable level of security to protect goods and data and prevent unauthorized access thereto. These precautions are designed to prevent damage, loss or misuse and must apply to both third parties and the suppliers' own employees.

# WHISTLEBLOWER CLAUSE

By fostering a culture of openness and accountability, we encourage employees to speak up without fear, reinforcing our commitment to ethical standards and continuous improvement.

Whistleblowers play a vital role in identifying and reporting unethical behavior, misconduct or violations of company policies. To support and protect them, we ensure accessible, confidential reporting channels and guarantee protection against retaliation.

According to EU Guidelines 2019/1937 for the protection of persons who report breaches of union law, anyone can report directly to the Federal Office of Justice: BfJ - Zuständigkeit der Meldestellen ([bundestjustizamt.de](https://www.bundestjustizamt.de)).







# ACCESS & EVALUATION

## ENSURING COMPLIANCE

Sabik Offshore reserves the right to inspect and check suppliers at any time to ensure that they comply with the present Code of Conduct.

All suppliers must ensure unrestricted access to inspections on site, including unannounced visits from Sabik Offshore and/or its appointed representatives. There must be full access to all information that may indicate whether suppliers comply with Sabik Offshore's Code of Conduct or not, and inspectors must be able to conduct confidential interviews with randomly chosen employees during these inspection visits.

If a site inspection reveals a failure on the part of suppliers to comply with the present Code of Conduct, Sabik Offshore will enter constructive dialogue with the supplier in question to improve conditions. Sabik Offshore will demand satisfactory action plans designed to remedy any breaches of the Code of Conduct and will carry out follow-up inspections to ensure that necessary improvements are implemented.



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