



## **Supplier Code of Conduct of SeaLead Shipping Pte. Ltd.**

### **Building Strong Partnerships with Our Suppliers**

Our aim is to foster enduring, thriving, and mutually beneficial relationships with our suppliers, enabling both sides to grow and succeed. We believe that by working together, we can create a greater positive impact on individuals, communities, and the environment. The following principles serve as the cornerstone of our collaboration with suppliers.

#### **Transparency**

All parties bound by this Code pledge to maintain openness with one another and with any relevant third parties (e.g., auditors), especially in the context of identifying, preventing, and addressing human rights and environmental risks. This openness extends to the disclosure of any negative impacts on human rights and the environment by the supplier, its subcontractors, or any other third party engaged in fulfilling SeaLead's contracts and orders.

#### **Collaboration**

By joining forces with our suppliers, we can more effectively identify, prevent, minimize, and address negative human rights and environmental impacts across our organizations and supply chains. Together, we share a mutual responsibility to uphold business ethics, protect human rights, and safeguard the environment. Collaboration plays a vital role in engaging stakeholders at all levels and building influence alongside peers and rightsholders to enhance human rights and environmental standards. The parties commit to acting in a spirit of collaboration, responding proactively and with care, in line with the principle of cooperation.

#### **Conducting Business with Integrity**

Suppliers are expected to operate in a way that upholds transparency, honesty, and ethical behavior in every aspect of their interactions. We require our suppliers to adopt a zero-tolerance approach to corruption and to ensure full compliance with all relevant UN and Organisation for Economic Co-operation and Development (OECD) anti-corruption conventions, as well as all applicable anti-corruption laws.

### **Anti-Corruption Commitment**

- Suppliers are required to refrain from engaging in or benefiting from any form of corruption, extortion, or bribery.
- Suppliers must implement and uphold a written policy prohibiting illegal attempts to influence or bribe public officials, business partners, or customers, while promoting awareness of this policy among their workforce.
- Suppliers must disclose any significant commercial, financial, or other direct or indirect connections with government agencies, political parties, or officials of public/government-owned entities.
- Suppliers must not offer any invitations or gifts to our employees with the intent of gaining undue influence or advantages. Any invitations or gifts extended to SeaLead employees or affiliated parties must be modest, of low financial value, and in line with local business customs.
- Suppliers are required to document and report any instances of offering, receiving, or being asked to provide bribes or facilitation payments. They must also resist and reject such requests unless there is a risk to personal safety.

### **Anti-Money Laundering Compliance**

- Suppliers are required to adhere to all relevant laws regarding the prevention of money laundering and must avoid involvement in any money laundering activities.

### **Sanctions and Export Control Compliance**

- Suppliers are required to comply with all applicable national and international sanctions and export control regulations, including those from the UN, US, EU, and UK, regarding business dealings with specific countries, entities, and individuals, as well as the transfer or re-export of goods, services, software, or technology between nations.
- Suppliers must not engage with any sanctioned individuals or entities in connection with business activities involving SeaLead.
- Suppliers must refrain from offering any restricted goods or services that could implicate SeaLead.
- Suppliers are expected to conduct thorough due diligence when selecting providers of goods, services, software, or technology to ensure full compliance with sanctions and export control regulations.

## **Dedication to the Environment**

We are dedicated to safeguarding the planet and constantly explore innovative solutions to preserve global resources. We pledge, and expect our suppliers to equally commit to Decarbonization and Biodiversity Protection and take actions to:

- ❖ Implementing actions to enhance energy efficiency and utilizing renewable energy sources where feasible.
- ❖ Reducing both direct and indirect greenhouse gas emissions, including those from their upstream value chain.
- ❖ Regularly evaluating the effectiveness of these measures and adjusting them as necessary.
- ❖ Protecting natural ecosystems by avoiding actions that lead to deforestation, habitat destruction, or the degradation of any natural landscapes.
- ❖ Continuously engaging in proactive environmental initiatives to reduce pollution, minimize risks, and improve environmental protection within their sphere of influence.
- ❖ Avoiding the extraction of deep-sea raw materials until sufficient scientific research confirms that deep-sea mining can be done without harming marine ecosystems.

## **Ethical Business Practices**

As a global entity, our commitment to adhering to international regulatory standards and internal policies is central to our operations at SeaLead. We pledge to uphold these principles and expect our suppliers to do the same:

- Complying with all relevant laws and regulations governing their business activities. The parties are obligated to follow applicable local, national, and international laws, including those concerning competition, embargoes, sanctions, corruption, bribery, money laundering, and social and environmental sustainability.
- Prohibiting unethical or corrupt behavior, including extortion and bribery, by employees and business partners. SeaLead has a strict no-tolerance policy regarding any form of corruption, whether it is public or private, active or passive.
- Complying with data privacy laws and fulfilling contractual obligations related to confidentiality and information security.
- Acknowledging and adhering to SeaLead's Human Rights policy and Child Labour Compliance policy.

## **Implementation of the Code**

This Code is applicable to all suppliers of SeaLead. In this context, "Suppliers" includes suppliers, subcontractors, agents, consultants, and their respective affiliates that provide goods and/or services to SeaLead.

Our suppliers must acknowledge and commit to following the responsible business principles detailed in this Code. In instances where national laws establish different protection standards than those outlined in this Code and its references, the signatories shall adhere to the principles that offer superior protection for workers and the environment, provided they do not conflict with national legal requirements.

All suppliers are responsible for ensuring that this Code is communicated to their own suppliers and are expected to uphold the requirements set forth within it.

## **Reporting Incidents and Corrective Measures**

If a supplier becomes aware of any actual or potential violation of its obligations under this Code or within its supply chain, it must promptly take suitable corrective actions and notify SeaLead immediately through the specified channels outlined below. The supplier is also required to inform SeaLead of any official investigation procedures related to the incident.

Once notified by the supplier or upon discovering an incident through other means, SeaLead will reach out to the supplier as soon as possible and will require and assist the supplier in ceasing the non-compliant practice. SeaLead is committed to implementing appropriate preventive and corrective measures in collaboration with its suppliers.

## **Reporting Concerns**

If there are actual or potential violations of this Code, SeaLead should be notified through its channels via [info@sea-lead.com](mailto:info@sea-lead.com). We encourage anyone, whether affiliated with SeaLead or not, to voice concerns if they suspect or are aware of any potential or actual breaches of this Code. Retaliation against individuals who report in good faith is strictly prohibited.

Suleyman Avci  
Global Chief Executive Officer