



MANAGEMENT SYSTEM



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PROCESS ID	GM-005

Custodian	GHHR&T
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Objective	To describe and demonstrate EM&I's ethical values in carrying out our business and to guide our employees, contractors, associates and partners in complying with our Code of Ethics policies
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Performance Measures	Internal and External Management Audits
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Scope	This process shall be applied to managing our compliance with the EM&I Code of Ethics for all of the EM&I Group.
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References	Company Values Statement Office and ICT/Data Management Systems
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Competencies	<ul style="list-style-type: none"> ▪ Author: CEO ▪ Approved by Board of Directors EM&I (Maritime) Ltd ▪ Document reviewed 12 Monthly by CEO
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Review Period	12 Monthly
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Deliverable Output	Carrying out our business in accordance with our Code of Ethics
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Reviewed	M Mackie	Date	19/06/2025
Approved	D Constantinis	Date	19/06/2025



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Review History

Review Date	Revision No	Comments	Reviewed By
14/02/06	0	Revised Technical Information Policy Statements	D A Constantinis
10/04/13	1	Reviewed document and recommended detailed review of current legal requirements and consideration of links to a Code of Conduct.	D A Constantinis
25/08/13	2	Revised Technical Information Policy Statements	P Lawless
25/08/14	3	Revised Technical Information Policy Statements	P Lawless
25/08/15	4	Reviewed document and confirmed adjusted for renewed EM&I Values	P Lawless
20/02/19	5	Reviewed for content and format – no significant changes	P Lawless
06/06/21	6	Replaced HR Policy Statement with Anti-Discrimination, Child Labour Avoidance, Modern Slavery Avoidance, and Freedom of Association and Bullying and Harassment Policies. Removed reference to Security Policy which was not included. Made changes to Charities, Donations and Sponsorship Policy and Agency and Facilitation Payments Policy	P Lawless
16/06/23	7	Reviewed for content and format – change in CEO	D Constantinis
19/06/25	8	Review of content and adjustment to include Whistleblowing	D Constantinis

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1.0 INTRODUCTION

This document describes the EM&I Group's Code of Ethics and how we manage our business activities to ensure we comply with the Code of Ethics.

We want our Clients, Stakeholders, Employees, Partners, Regulatory Bodies, and the General Public to know our values when we do business.

This document is not commercially confidential and shall be read, understood, and observed by all EM&I employees, contractors, and partners.

Where appropriate this document shall also be presented to Clients to demonstrate our commitment to the ethical code described within.

The document contains Statements, Policies and Guidance Notes on the following:

Statements

- EM&I Mission
- Our Values – The EM&I Way

Policies

- Anti-Discrimination Policy
- Bullying and Harassment Policy
- Child Labour Avoidance Policy
- Modern Slavery Avoidance Policy
- Freedom of Association Policy
- Bullying and Harassment Policy
- Technical Information Policy
- Conflicts of Interests Policy
- Confidentiality Policy
- Gifts, Bribes, and Inducements Policy
- Anti-Corruption Policy
- Fair Representation Policy
- Charities, Donations and Sponsorship Policy
- Agency and Facilitation Payments Policy

Guidance Notes

- Training
 - Audit & Review
 - General guidance on compliance with Code of Ethics
 - Whistleblowing Channel
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2.0 STATEMENTS

Mission



Our Mission is to be a leading global Asset Integrity Services provider to the oil, gas, and renewable energy industries. We endeavour to ensure the EM&I Group is competitive, innovative, forward thinking and rewarding for clients, staff, and shareholders.

Our Values

Our Values	
<i>“The EM&I Way”</i>	
People	We recruit, develop and retain the best. We deliver a Global Service with empowered Local Support and knowledge We recognise and reward achievement.
Passion	We have a passion for quality, creativity, innovation, practical solutions and exceeding expectations. We provide inspirational leadership based on a passion for the Value we deliver. Our passion and performance are driven by our core beliefs in Health, Safety, Sustainability and the Environment.
Understanding	We are experts in our industry and we use this expertise to deliver Value to our clients, staff and shareholders. We work hard to empathise with our Clients’ and their Stakeholders’ businesses, their needs, and what success means to them. We are inquisitive and we challenge assumptions, because we understand our industry.
Openness	We are transparent, honest and reliable, and therefore build trust internally and externally. We share knowledge and learning to improve what we do. We are straightforward in our communications.
Integrity	Our personal integrity underpins our collective integrity. We do what we say we will do. We are honest, accountable and ethical in all our dealings.
Partnership	We develop positive relationships and teamwork. We share solutions, achievements and rewards. We assist Clients and Regulators by being an integral part of their team. We are responsive, loyal and deliver consistent support to our clients and our people alike.

We encourage our people to work in a constructive and positive way, valuing both their team achievements and individual success.

The EM&I team are dedicated, capable, committed, and experienced, but most importantly, they are a team, focused on delivering value to our Clients safely and professionally.

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3.0 POLICIES

ANTI-DISCRIMINATION POLICY

It is EM&I policy to treat all employed and subcontract personnel in a uniform, fair, non-discriminatory, and respectful manner and to ensure that they are each competent and willing to carry out the tasks entrusted to them.

EM&I is an equal opportunities employer. No job applicant or Employee will receive less favourable treatment on grounds of disability, sex, marital status, creed, colour, race, or ethnic origins or be disadvantaged by conditions or requirements that cannot be shown to be justifiable.

It is the duty of all Employees to ensure that this policy is observed at all times.

The Company will seek to ensure that individuals are selected and promoted on the basis of their aptitude, skills, and ability.

The Company regards with the utmost seriousness any acts of racial, sexual or disability related harassment. These will normally result in summary dismissal of the employee, should the Company consider the nature of the act to constitute gross misconduct.

This will be achieved by:-

- Observing appropriate legislation and guidelines on employment as our minimum standards
- Ensuring that all personnel are aware of this policy
- Auditing our supply chain to ensure that suppliers comply with this policy
- Ensuring that failure to observe such practices at any level is reported and that appropriate corrective action is taken
- Ensuring that we regularly appraise our peoples' performance and competencies in the context of our needs and provide them with opportunities to develop appropriate skills
- Rewarding our people with a fair remuneration package
- Motivating our people with performance related rewards wherever appropriate
- Thanking our people and subcontractors promptly and appropriately when they have met or exceeded our expectations

Danny Constantinis
CEO
08/08/2025



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CHILD LABOUR AVOIDANCE POLICY

EM&I does not accept child labour in its supply chain and strictly prohibits the direct or indirect hiring of any person under the age of 18.

In the event that a key supplier is found to be non-compliant and fails to remedy the non-compliance to EM&I's satisfaction then EM&I will treat such non-compliance as grounds for termination and any future business opportunities with EM&I.

EM&I's key suppliers are formally audited on an annual basis to ensure compliance.

Danny Constantinis
CEO
08/08/2025



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MODERN SLAVERY AVOIDANCE POLICY

This policy applies to all persons working for EM&I or on EM&I's behalf in any capacity, including employees at all levels, directors, officers, employees, local representatives (agents), contractors and suppliers.

EM&I strictly prohibits the use of modern slavery and human trafficking in our supply chain. We will implement and maintain systems and controls aimed at ensuring that modern slavery is not taking place in within our organisation or in our supply chain. We expect that our suppliers will hold their own suppliers to the same high standards.

We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.

The prevention, detection, and reporting of modern slavery at EM&I and our supply chain is the responsibility of all those working for EM&I or on our behalf.

Employees must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

EM&I is committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk-based approach to our contracting processes and keep them under review.

Danny Constantinis
CEO
08/08/2025



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FREEDOM OF ASSOCIATION POLICY

Freedom of association is the right of all workers and employees without exception to establish and join organisations of their own choosing without prior authorisation and without interference from EM&I or from one another.

Freedom of association grants an explicit right for all workers to create or join their own organisations of representation or trade unions in whatever form they decide is most effective.

EM&I itself is entitled to create or join its own organisation of representation or trade unions in whatever form it decides is most effective.

EM&I recognises the importance of collective bargaining and actively works to maintain such agreements to the mutual benefit of EM&I and its workers.

EM&I supports the International Labour Organisation's (ILO) mission of promoting social justice and internationally recognised human and labour rights.

Danny Constantinis
CEO
08/08/2025



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ANTI BULLYING AND HARASSMENT POLICY

EM&I is committed to providing a working environment for employees and contractors which is free from bullying, harassment and intimidation.

Harassment is broadly defined as any conduct towards an individual which is regarded as unwelcome or offensive by the recipient, and which may adversely affect the dignity of an individual.

Sexual harassment is defined as conduct towards another of a sexual nature, or that which is specifically based on a person's gender and is regarded as offensive or unwelcome by the recipient.

No form of harassment of employees and contractors will be tolerated by EM&I. Individuals are encouraged to try to resolve any issues informally in the first instance, however, individuals can be assured of the EM&I's full support in addressing concerns of unacceptable behaviour.

EM&I will not tolerate victimisation or retaliation against anyone raising or assisting with any bullying or harassment complaint. EM&I considers bullying and harassment as disciplinary offences which may result in summary dismissal.

Danny Constantinis
CEO
08/08/2025



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TECHNICAL INFORMATION POLICY

It is EM&I policy to provide technical information and professional advice in an accurate, clear, and unbiased manner.



We will observe approved EM&I procedures and methodology and use industry best-practice to develop and produce such information and advice.

Limitations or tolerances which affect the quality or interpretation of the information and/or advice provided will be clearly stated in our reports.

We will ensure that the people carrying out the process of providing such information or advice are competent and experienced to do so as defined in our management systems and contractual agreements.

We will ensure that information or advice is peer reviewed and observes our Quality System, Audits, Reviews and Authority Levels for internal approval before issue.

Danny Constantinis
CEO
08/08/2025

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CONFLICTS OF INTERESTS POLICY

It is EM&I policy that actual or potential conflicts of interests are sought out at all levels in the organisation and steps taken to manage such conflicts so that they do not affect our Code of Ethics.

Each Director and employee is required to agree and observe a Conflicts of Interests clause in their contracts of employment.

Agreements with EM&I contractors and partners must likewise include a clause which has the effect of managing such conflicts so that they do not affect our Code of Ethics

The purpose of the Conflicts of Interests Policy is typically to avoid situations where:

A Director, employee, contractor, or partner must not have an interest in or be connected directly or indirectly with any activity or interest that will affect their ability to observe the EM&I Code of Ethics.

Typical examples of situations that must be recorded and managed are:

- The holding of shares or any direct or indirect interest or benefit with a competitor, client, or supplier to EM&I
- Carrying out any EM&I business with, or employing a member of one's family in an EM&I business
- Individuals direct or indirect involvement with the design, manufacture, installation, operation, or other similar activity of items subject to inspection, test, monitor, repair, or maintenance by EM&I
- Providing goods, materials, or services directly or indirectly to EM&I

Such situations must be declared by the individual, recorded on their personnel file, and evaluated by the CEO or his delegated representative before deciding on what action needs be taken.

Actions can include, agreeing with the employee how to control and monitor the situation, requiring the employee to change the situation or in recurring or extreme cases, termination of the employment of the individual concerned.

Danny Constantinis
CEO
08/08/2025

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CONFIDENTIALITY POLICY

It is EM&I policy that all personnel, contractors, and partners shall be required to agree to and observe a Confidentiality Policy which protects the intellectual property and confidential information of the EM&I Group, Clients, personnel, partners and contractors.

The form of the Confidentiality Agreement may vary for particular circumstances, but they will follow the spirit of the Agreement outlined below:



Theshall not, except as authorised or required by him to properly exercise his duties under this Agreement, or obliged by law, reveal to any person or use for his own purposes or for any purposes other than those expressly agreed herein any of the trade secrets, secret or confidential operations, processes or dealings or any information concerning the organisation, prospective business, business methods, systems or affairs, finances, transactions or affairs of the Company or of any other Company in the EM&I Group their Clients, personnel, partners, contractors which may come to his knowledge during and as a result of his employment and shall keep with complete secrecy all confidential information entrusted to him and shall not use or attempt to use any such information in any manner which may injure or cause loss either directly or indirectly to the Company or of any other Company in the Group their Clients, personnel, partners, contractors or their respective businesses or may be likely so to do.

This restriction shall continue to apply after the termination of this Agreement without limit in point of time but shall cease to apply to information or knowledge which the.....establishes has become public knowledge otherwise than through any unauthorised disclosure or other breach on thepart of this provision or which is ordered to be disclosed by a Court of competent jurisdiction or otherwise required to be disclosed by law.

Name:

Signature:

Date:

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GIFTS, BRIBES, AND INDUCEMENTS POLICY

It is EM&I Policy that employees should refuse to accept inducements of any kind. Our impartiality is a major factor in maintaining our high standing and reputation.

The acceptance of a major gift under any circumstances will be regarded as an act of gross misconduct and subject to instant dismissal as defined in the Company's disciplinary code and the matter will be referred to the Company's Lawyers and the police.

It is difficult to draw up clearly defined rules when the giving of gifts, particularly during Festive occasions, by so many firms is common practice. However, the Company's policy, which is vital to our business and the well-being of employees, is as follows:

It is contrary to Company policy for staff, managers, and executives at any level to accept gifts or inducements of significant value from Companies they deal with in the normal course of their duties.



Minor Gifts - Minor gifts or presents may be accepted but only after agreement with the employees' Line Manager. Minor gifts are defined, for example as stationery, calendars, a single bottle of wine or spirits, soft drinks, or fortified wines.

This is not an exhaustive list, and the employee should consult their Line Manager if in doubt.

Major Gifts - These will either be returned by the Company or given to a local charity, the sender being informed in the kindest and most polite way possible of our policy and course of action.

Staff, Managers or Executives who are found to have deliberately accepted and not declared gifts considered by the Company to be major in value as outlined above, will be guilty of gross industrial misconduct for which the penalty will be dismissal.

Danny Constantinis
CEO
08/08/2025

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ANTI-CORRUPTION POLICY

It is EM&I policy to conduct our business in a lawful manner which is consistent with the highest ethical standards in our industry, globally.

EM&I's Directors, employees, contractors, and partners will not directly or indirectly:

Make or offer any inducements or unwarranted or unearned benefits where this would unethically influence the benefits to EM&I, its Directors, its employees, its contractors or be contrary to the laws of the country in which work was contracted or being offered or contrary to the contractual terms agreed with a third party.

EM&I recognises that friendly relationships will develop between its personnel and other individuals that may be misconstrued as having an undue influence on EM&I's Code of Ethics. This situation will be managed by the individual concerned making a declaration of such a relationship and the Company keeping a record of such declarations so that any interested parties may observe that the relationship complies with EM&I's Code of Ethics.

Danny Constantinis
CEO
08/08/2025



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FAIR REPRESENTATION POLICY

It is EM&I policy to represent its products and service fairly and to avoid making exaggerated claims in its marketing, sales, or promotional literature.

We will promote our own capabilities and the benefits of the services and products we offer rather than denigrate our competitors' offerings.

If we are required to make comparisons of the benefits of our services or products with respect to other competitive methods we will do so fairly and with supporting evidence

Promotional literature and information will be reviewed by a Director of EM&I (Maritime) Ltd to comply with this policy

Danny Constantinis
CEO
08/08/2025



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CHARITIES, DONATIONS AND SPONSORSHIP POLICY

Charities

It is EM&I policy to donate to appropriate charities.

EM&I typically only support charities that have no political or pressure group motives.

Proposals for charitable donations are made by staff via their Line Managers to their Board of Directors after consultation with their staff.

Proposals are reviewed by each Board of Directors prior to approval.

Donations

It is not EM&I policy to make donations to organisations other than charities.

Sponsorship

It is not EM&I policy to sponsor any activities other than those which have a charitable cause supported by EM&I's Charity Policy or which have the purpose of promoting the EM&I company in media events, publications, conferences as dealt with under the Marketing and Business Development Management Systems.

Danny Constantinis

CEO

08/08/2025



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AGENCY AND FACILITATION PAYMENTS POLICY

It is EM&I policy that whereas we need the assistance of individuals or organisations to assist us in marketing, obtaining visas, permits, licences or other business facilities that any fee paid to an Agent or Facilitator is:

- Fair and reasonable in the circumstances for the service rendered
- Properly recorded either through the mechanism of a formal Agency or Representation Agreement or through an invoice approved by the CEO.

If in doubt about how to proceed seek advice and formal approval for your chosen course of action from your Line Manager

Danny Constantinis
CEO
08/08/2025



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WHISTLEBLOWING CHANNEL

EM&I has implemented a global Whistleblowing Channel, managed externally by an independent company, to provide a safe, secure and supportive environment which encourages whistleblowers to speak up and be heard.

Danny Constantinis
CEO
08/08/2025

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4.0 GUIDANCE NOTES

Awareness

The Code of Ethics Policy will be brought to the attention of EM&I personnel, contractors, and partners through the actions of:

- The Board of Directors instructing the CEO to develop and implement a Code of Ethics awareness programme.

This will include workshops for Managers and Supervisors who will then apply such awareness training to their own staff.

- Making relevant elements of the Code of Ethics part of the Standard Terms and Conditions of contracts of employment, sub-contract agreements and partnership agreements.

Guidance

Guidance will be provided through the line management system with the option of a direct line of communication to the Board of Directors if an individual feels that a Code of Ethics violation merits such a course of action.

The Board of Directors will investigate all such communications provided that they are not found to be frivolous or malicious in the early stage of review.

Monitoring

The Code of Ethics will be monitored by audits of the Quality, HR, Technical and Finance management systems and through any reports of violations.

Review

The Code of Ethics Management System will be reviewed 12 Monthly by the CEO as indicated on the front page of this Management System Document.