

## 1 INTRODUCTION

Seagems Group and its subsidiaries (hereafter “Seagems”) are committed to the highest standards of business ethics which govern the conduct of our business operations and our employees.

## 2 PURPOSE

This policy is designed to provide guidelines for procedures that will allow Seagems to evolve a consensus on the ethical principles that should guide our conduct. Ensuring good ethics involves all employees and all employees should familiarize themselves with this policy.

## 3 SCOPE

This policy applies to all in Seagems. It is our corporate responsibility to uphold these principles throughout our organization. We expect all our stakeholders, including employees, vendors and suppliers, business partners, shareholders, and investors, to be aligned in upholding a high ethical standard.

## 4 CUSTOMERS

Seagems will take all reasonable care to avoid misleading statements, concealment, and overstatement in all our advertising and public statements. Seagems will seek to build long-term partnerships with our customers by always being honest and straightforward in our dealings. We will respect the confidentiality of any information obtained about our customers.

## 5 COMPETITORS

Seagems will build its reputation based on its performance alone. Seagems will not cause or be part of any breach of applicable competition laws and regulations, such as illegal cooperation on pricing, or illegal market sharing. We will act independently of our competitors and will not seek to damage the reputation of our competitors either directly or by implication.

## 6 MONEY LAUNDERING AND TAX OBLIGATIONS

Seagems will ensure compliance with all applicable anti-money laundering laws and shall take steps to prevent its financial transactions from being used by others to launder money. Seagems will report and pay its public taxes and fees according to the current law requirements.

## 7 BRIBES AND CORRUPTION PRACTICE

Seagems shall comply with laws and regulations related to bribery, corruption, fraud, and all other illegal business activities.

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Seagems does not allow direct or indirect offer, payment, solicitation, or acceptance of undue benefits, improper advantages or bribes in any way or form. Seagems will not by intent or negligently search to get access to information that can give an undue advantage.

Seagems employees, hired consultants or any business partners shall neither seek nor accept for themselves or others any gifts, favors, or entertainment without a legitimate purpose, from any person or business organization that does or seeks to do business with, or is a competitor of Seagems. Gifts, favors, and entertainment may be given to others at the expense of the company if these are consistent with customary business practice and are not excessive in value.

Seagems will not sponsor political parties or politicians.

Seagems has zero tolerance for all forms of corruption, and we will act openly, transparently, and intelligible on this matter.

## 8 RESERVATION OF RIGHTS

Seagems reserves the right to interpret, modify, terminate, or revise this policy in whole or in part, without notice.

## 9 REFERENCE

- SG-DMS 2.1 - Employee Code of Conduct*
- SG-DMS 2.2 - Human Rights Policy Statement*
- SG-DMS 2.4 - Equal Opportunities Policy*
- SG-DMS 3.1 - Health & Safety Policy*
- SG-DMS 3.3 - Environmental Policy*
- SG-DMS 4.1 - Ethical Trading Policy*

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Seagems Group CEO

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