

Rev: 0

Date: 08/01/2025

SML-ADM-POLC-07

CODES OF ETHICAL CONDUCT POLICY

SEAKEY MARINE LIMITED (SML) is engaged in the provision of Marine Support Services, Marine Logistics Services and Marine Security Services to the Oil, Gas and General Cargo Marine/Shipping Industry. Consistent with SEAKEY MARINE commitment to and conformance with its responsibility to respect human rights as reflected in the Human Right policy.

Seakey Marine Limited is committed to the respect of human rights and the dignity of human beings, as well as the prohibition of bribery, conflicts of interest, corruption and other crimes (e.g. use of legal or illegal substances which impact on performance)

Therefore, all employees and persons working on Seakey Marine behalf are expected to conduct themselves in accordance with this Code of conduct at all times and understand their responsibilities to abide by human rights, local, national and international law, and to prevent and report any abuses of human rights including (but not limited to) prohibition of:

- a) Torture or other cruel, inhuman, or degrading treatment or punishment;
- b) Sexual exploitation and abuse or gender-based violence;
- c) Human trafficking;
- d) Slavery and forced labour;
- e) The worst forms of child labour;
- f) Unlawful discrimination.

Seakey Marine Limited affirms commitment to the following;

- We comply with Nigeria constitution as it relate to the protections of Human Rights
- We comply with all international laws related to the protection of Human Rights.
- We comply with the International Code of Conduct (ICoC).
- We do not offer to pay, solicit or accept bribes in any form whether directly or indirectly. This includes payment or receipts of "facilitation payments" which are small payments of gifts made as common practice in some countries to obtain approvals, permits etc.
- We do not make political donations anywhere in the world.

This Code will be applied to all employees and stakeholders of Seakey Marine in accordance with all other relevant policies of Seakey Marine.

The conformance to this Policy will be monitored as part of the continual assessment of our policies and management system processes.



Managing Director

8th January 2025

Date