



RIGHTSHIP

Code of Conduct

Our guiding principles

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A message from Steen: helping us live our Values every day

am delighted to share our Code of Conduct.

I encourage every one of us to read and understand the importance of this document, as it sets out standards of behaviour and professionalism that will help us live our Values every single day.

We will only achieve our vision of a maritime industry causing zero harm, and become a trusted innovation partner, charting a safe, sustainable and socially conscious future, if we have clear attainable standards that we live by. Our Code of Conduct helps us achieve such standards.

It is critical we all work professionally in every one of our dealings and interactions, internally across RightShip and externally with our myriad of stakeholders. We must protect our business with integrity and transparency, safeguarding our expertise and knowledge.

As RightShip becomes progressively recognised as an Environmental, Social and Governance maritime digital platform, it is essential we emulate the standards we look to set for our industry by being exemplary corporate

citizens. It is also vital that as we increasingly use and interact with social media, we do so wisely and mindfully. We must remember this is a highly effective tool with the ability to do a huge amount of good, but also to compromise us as individuals, and as an organisation.

As mentioned earlier, I strongly encourage you to read and understand our Code of Conduct, raising any questions you have with your manager or any member of the Leadership Team. If at any time you see actions or behaviours that may be a cause for concern, please highlight these, in confidence, to your manager or our Human Resources team.

I am continually impressed, not only with how strong an ethic of collaboration we have throughout RightShip, but also how we continually care about our colleagues. Thank you for your commitment to keep to the highest standard of behaviour and care in our interactions with each other, our customers, suppliers, partners and in the communities we engage with daily.

Steen Lund
Chief Executive Officer
May 2023



At RightShip we:

Live our Values every day.

Understand why we have a Code of Conduct and to whom it applies.

Work professionally.

Look after each other.

All work together.

Act with integrity.

Safeguard our knowledge.

Protect our business.

Are good corporate citizens.

Use social media wisely.

Act when we are concerned.



Why have a Code of Conduct?

Our Code of Conduct ("Our Code") establishes a general framework of behaviour and standards expected of anyone employed by, or acting on behalf of, RightShip.

This includes RightShip's expectations of all of us in the performance of our duties, interactions with colleagues, customers or clients, suppliers, third parties and other stakeholders.

To whom does it apply?

Our Code:

- > applies to all employees (existing and prospective) acting for, or on behalf of, RightShip at all levels. This includes permanent, fixed term or temporary employees, directors, executives, officers, consultants, secondees, contractors and agents.
- > applies and operates alongside other RightShip policies, and we are all expected to familiarise ourselves with it.
- > is regularly reviewed and updated, so you should refer to the intranet for the latest version.
- > cannot describe or anticipate every situation, so it shows us where we can get more support and provides examples and resources to guide our good judgement.



To speak up or not?

If something feels wrong, ask yourself these quick questions.

Does it fit with the RightShip Values?



Safety

could it directly or indirectly endanger someone or cause them physical or mental harm?



Law

is it legal and in line with our policies and procedures?



Conscience

does it fit my personal values?



Media

if this appeared in the media would I feel comfortable?



Family

what would I tell my child, partner, parent or friend to do?



Feel

what is my intuition or 'gut feeling'? If it feels bad, it probably is.

If you feel uncomfortable or have difficulty answering any of these, **speak up**.

If in doubt, discuss with your manager, a member of the Leadership Team or HR.



Confidentiality and anonymity

When you speak up, the information you provide will be dealt with confidentially, subject to RightShip's compliance with any applicable laws.

If you wish to remain anonymous, all reasonable steps will be taken to reduce the risk that you will be identified as a result of a response being made to your concern.

This means the information you provide will only be shared where necessary for the purposes of the investigation and, as far as possible, measures to protect your identity will be put in place.

Our Mission, Vision and the Values we live by

Vision: A maritime industry that causes zero harm

We want RightShip to be a central participant in progress that ensures that every seafarer goes home safe after each voyage, and that we can achieve significant decarbonisation goals that ensure that our environment is protected as a result of effective sustainable action. We believe there can, and will be, a time when the maritime supply chain causes no harm to people and oceans.

Our vision is our 'why.' It is what we are ultimately working towards.



Mission: To be a trusted innovation partner, charting a safe, sustainable and socially conscious future for the maritime industry

Our mission is reflected in the work we do every day to reach our ambitious long-term vision. That means committing to innovation that delivers the safe, sustainable, people-centric goals towards which we are working.

Every member of the RightShip team must commit to bring our vision, mission and values to life. We believe that when everyone understands what they can do as an individual, the collective impact makes us unstoppable on our path to success.

Our Values

Our Values are the principles that each of us lives by, to help us work together as a team and achieve our goals. Values can be seen in the quality of our work, our culture and our interaction with each other and customers.



Our People

We are passionate professionals, committed to respectful, inclusive and results-oriented outcomes. Our team creates positive experiences that empower and allow others to thrive. We encourage and seek out diversity of thought, opinions, and ideas as they help us to better leverage our capabilities and create a greater impact.



Care

We care deeply about our industry, the environment, our customers and each other. The quality of our work and the impact we leave is important to us. Our team cares about the future of our industry. We use our expertise and insights to influence a better, more sustainable future for the maritime industry and the individuals and communities it touches.



Innovation

We seek to share knowledge and we are willing to challenge the status quo. Our agility and commitment to improvement enable us to build value in an evolving maritime industry. We embrace sustainability in our solutions, take a collaborative partnership approach and build strong relationships that support shared outcomes.



Integrity

We are a trusted voice because we make ethical, unbiased decisions and hold ourselves and others accountable. Our team is transparent and open with our information, data and insights. We take our commitments seriously, are disciplined and deliver on our promises.



Our Name

We are our name: RightShip. The sum of all our values. Our mission is built around safety, sustainability and crew wellbeing, and we strive to have a meaningful impact. Our commitment and pride in what we do creates the positive experiences our customers, partners and people expect.

Our Code provides guidance on the types of behaviours which are acceptable to RightShip, and, as such, it is critical we all understand and comply with the obligations prescribed by it.

We work professionally

Our personal and professional behaviour must conform to the standards expected by RightShip, colleagues, customers or clients, suppliers, business affiliates, and any other third party or stakeholder of RightShip.

To achieve this, in our day-to-day activity, we always:



Act honestly, fairly and with integrity.



Display impartiality, transparency, openness and accountability in decision making.



Maintain a professional and safe environment, free from discrimination, harassment, bullying and victimisation.



Serve RightShip faithfully and diligently, exercising all due care and skill in the performance of our work.



Refrain from acting, or being seen to act, in conflict with the best interests of RightShip.



Display the highest ethical and professional standards of work and service delivery and confidentiality towards RightShip and any person or organisation connected to RightShip, including clients, suppliers, competitors and the like.



Use RightShip equipment and technology appropriately.



Take appropriate care for the health and safety of ourselves and others at work.



Comply with any lawful and reasonable directions given in the course of employment.



Comply with relevant statutory requirements and industry regulations or guidelines.



Be aware of and comply with all RightShip policies and procedures, including our Code.

We never:

Hold positions or investments in organizations that have business dealings with RightShip if we can influence transactions, or if the relationship itself creates an actual, potential, or perceived conflict of interest.



Hire, promote or directly supervise a close relative, unless this has been specifically authorized via HR.



Appoint or award business to any party with which we are personally or financially associated.



Misuse RightShip resources (including information), or our position of influence at RightShip, to promote or assist an external activity or party.



Interfere in the fair and transparent operation of bid or tender activities.



Personally pursue or undertake any opportunities in which RightShip could have an interest.



Accept gifts, hospitality, entertainment or other favors from any organization we are evaluating in a bid or tender with RightShip.



Accept gifts, hospitality or entertainment of an inappropriate value or nature (for example, sexually oriented) or at inappropriate venues.



Accept or request personal discounts or other benefits from suppliers, service providers, customers or other third parties due to our association with RightShip that the public or our peers do not receive, unless this has been otherwise approved.

We protect our business

We must treat as confidential all information obtained in the course of employment, or when acting on behalf of RightShip.

This includes assets or resources not publicly available, that are used, controlled or owned by RightShip including technology, business, products, services and finances.

It can also include operational data, be related to equipment, strategic and marketing plans, or other technical data.

We must take all reasonable steps to protect RightShip's assets and resources under our control and may not use these for personal benefit or to perform work for an external party.

Examples of confidential information, whether marked as confidential or not, include:

Products and services (existing and future).

Trade secrets, methods, processes, know-how, concepts, diagrams, data, computer programs, plans and designs.

The personal, business or financial details relating to RightShip and its suppliers, clients, or employees.

Third party information that RightShip has agreed to keep confidential.

The strategic, business, marketing and investment plans and strategies of RightShip.

Information that would be considered by law to be secret or confidential.

Intellectual property.

Any other information designated as confidential by RightShip.

We always

- > use our assets for their intended purpose.
- > protect our assets from waste, damage, misuse, loss, fraud and theft.
- > report any potential waste, damage, misuse, loss, fraud or theft of our assets.
- > prevent non-authorized personnel from accessing our facilities, information, data or other assets, where possible and safe to do so.
- > compete vigorously, but legally.
- > win based on our merits.
- > understand and comply with competition laws.
- > seek help when in doubt.

We never

- > use RightShip's assets for personal gain.
- > take physical property or information assets belonging to RightShip for unauthorized personal use.
- > enter any fraudulent or illegal transactions or fail to report any fraud of which we are aware.
- > take any action that undermines the integrity of vendor or customer data in our systems.
- > permit unauthorized entry to a RightShip site or office, or access to our information technology.
- > ignore security complaints or an inadequate security procedure that may present threats to RightShip employees or assets.
- > discuss prices, sales plans or volumes with competitors.
- > divide customers, markets or territories with competitors.
- > agree with others to limit production or not do business with customers or suppliers.

We safeguard our knowledge

The value of RightShip's knowledge, or 'intellectual property (IP)' can be impacted by improper disclosure or use, or failing to follow necessary formalities for protection, such as registration.

We are therefore required to take appropriate action and execute all documents making sure that intellectual property rights are appropriately assigned to RightShip.

By doing this we ensure that other people's intellectual property is not being misused.

The types of intellectual property that will typically be assigned to RightShip, include that which:

- > **arises out of or during a person's engagement by RightShip, or in the performance of our responsibilities and obligations.**
- > **is generated using the time, equipment, facilities or confidential information of RightShip.**
- > **relates to the business or anticipated business development activities of RightShip.**

It is our responsibility to ensure where intellectual property from a third party is being copied or shared, their intellectual property rights are not being infringed.

It is therefore important that we always use a third party's intellectual property only as permitted in writing by that party (for example in a contract with a supplier) or otherwise permitted by law.

What is 'intellectual property'?

Designs, patents, trademarks, works, trade secrets, procedures, technical designs, applications, patentable processes and/or articles are all kinds of intellectual property.

Additionally, this can extend to all inventions, discoveries and novel designs, whether registrable as designs, patents or trademarks or not, and the entire copyright in all works.



We always

- > enter into a confidentiality agreement with a third party before starting negotiations or any other engagement with a person outside RightShip who may receive or access RightShip's confidential IP or information.
- > are aware of what information is confidential and ensure colleagues are also aware (for example by marking documents). Only give confidential information to people who need to know it.
- > use RightShip's standard contracts wherever possible when contracting with suppliers, and only depart from RightShip's standard IP and confidentiality terms after consulting Legal or following applicable guidance notes.
- > keep any new IP created, such as innovations or improvements to our processes, confidential and check with Legal if any additional protection is required.
- > check that there are no third-party IP rights that may be infringed before we copy, share or deploy innovative technology or processes.
- > use a third party's IP only as permitted in writing by that party (for example in a contract with a supplier) or otherwise as permitted by law where we have advice from Legal.

We never

- > disclose RightShip's IP without first obtaining permission from our manager and, if the IP is confidential, making sure the recipient has a legal obligation to keep the information confidential (for example under a confidentiality agreement).
- > bring to RightShip any confidential information, including documents or computer records, from prior employers or clients without their written permission.
- > share, copy or deploy an innovative technology or process without first ensuring we are not infringing a third party's IP.
- > use third parties' copyright materials (for example, photographs, text, audio or video downloaded from the internet) or trademarks, in materials we are producing including for use on RightShip intranet sites, without first obtaining permission from the copyright or trademark owner.

We act with integrity

It is critical we always act with integrity, avoiding any potential conflicts of interest.

These may arise where a person exercises their status with RightShip to derive a personal benefit, including of a commercial or financial nature, meaning that the person's judgement, objectivity or independence in the performance of their duties is affected.

Conflicts are incompatible with RightShip's business interests because they can affect how we perform our work, including by compromising our quality of work.

Conflicts of interest can also arise where a person receives gifts, hospitality or entertainment from a client. Whether such items should be accepted depends on if they are sporadic, of minimal value, and is a matter of judgement.

Nothing that any of us does should conflict with our work responsibilities.

You must inform a manager as soon as you become aware of the possibility of a conflict of interest or circumstances which may give rise to a conflict of interest. This is important because unmanaged conflicts of interest can result in unethical behaviour.

Equally, RightShip expects that we never create a scenario where we influence or entice other employees to be in a position or create the appearance of conflict.

Some examples of actual, perceived or potential conflicts of interest include:

- > pursuing opportunities within RightShip for personal gain or benefit.
- > holding jobs outside of RightShip.
- > investing in businesses that are contracted to do business for or on behalf of RightShip.
- > receiving money, services or other forms financial personal benefits from existing or prospective stakeholders, including offers of travel or accommodation; and offering employment opportunities to close relatives or friends.



We always

- > record all transactions accurately and in reasonable detail to reflect their true nature.
- > understand the role and interests of the person with whom we are dealing.
- > provide accurate and complete information when seeking pre-approval.
- > get pre-approval before offering or giving anything of value, a commercial sponsorship or a community donation or project.
- > act in the best interests of our health and safety.
- > immediately report any corruption concerns.

We never

- > offer, promise, give or approve schemes which give an improper benefit to anyone.
- > establish a hidden or incorrectly recorded fund for prohibited payments.
- > use personal funds or hide activity which would otherwise need pre-approval.
- > use a supplier if we are concerned, they will engage in corrupt or improper conduct on our behalf.



We all work together

RightShip does not tolerate any form of unlawful discrimination.

Unlawful discrimination against a person based on personal attributes such as race, age, gender identity, sexual orientation, intersex status, physical or mental disability, relationship status, religion, political opinion, pregnancy, breastfeeding or family responsibilities is not tolerated.

RightShip seeks to promote equal opportunity and diversity in employment for existing and prospective employees by assessing a person's skills, qualifications and capabilities. RightShip expects that all work is conducted collaboratively, in support of inclusivity and demonstrates professional conduct and courtesy.

Accordingly, conduct that is or perceived to be offensive, intimidating, bullying, derogatory, humiliating or the like stands in breach of our Code. You must not partake in or facilitate any such behaviour.

RightShip is also committed to identifying, managing and minimising any risk of contravention of a person's human rights.

In line with our Code and RightShip's other policies and procedures, we must undertake due diligence when collaborating with suppliers or third parties to ensure that the risks of human rights breaches are properly assessed and any actual breaches are appropriately reported and addressed.

We always

- > demonstrate fairness, trust and respect in all our working relationships.
- > challenge inappropriate, exclusionary or discriminatory behavior, whether it is intentional or not.
- > make employment-related decisions, including recruitment, promotion, training, development, and remuneration free from bias.
- > respect the human rights of our workforce and those we work with, including suppliers and their staff.
- > report directly to our manager or HR any human rights concerns.
- > treat everyone equally, regardless of their industrial association or participation, or non-participation in industrial activities.

We never

- > behave in a way that would be viewed as offensive, insulting, intimidating, malicious or humiliating.
- > make jokes or comments about an individual's characteristics – including their race, gender, ethnicity, religion, sexual orientation, age, physical appearance, disability or other personal attribute.
- > distribute or display any offensive material including inappropriate photos or cartoons.
- > partake in, or facilitate hospitality or entertainment, of an inappropriate nature (for example, sexually oriented) or at inappropriate venues. This includes accepting or facilitating gifts of an inappropriate nature.
- > engage in physically or socially intimidating behaviors.
- > unlawfully discriminate in favor of, or against, someone based on personal attributes unrelated to job capabilities or performance.



We look after each other

It is everyone's responsibility to prevent and report workplace-related injuries and illnesses.

As such, the duty of identifying, assessing and taking steps to control health and safety hazards is a shared responsibility. Any accidents, injuries, illnesses, unsafe work conditions or similar must be reported to a manager or supervisor at the earliest possible opportunity.

Employees or any other person performing work for, or on behalf of, RightShip must cease work immediately if it is unsafe, or where appropriate protective equipment is not being used.

As part of our commitment to health and safety, all workplaces should be free from the use of alcohol and illegal drugs, and the misuse of other substances.

Anyone who visits a RightShip worksite must comply with all relevant health and safety expectations.

We always

- > comply with relevant health and safety requirements.
- > identify, assess and take steps to control health and safety hazards.
- > immediately stop any work that appears unsafe.
- > report any accidents, injuries, illnesses, unsafe or unhealthy conditions, incidents, to our manager.
- > act on all complaints or warnings raised with us.

We never

- > consume alcohol on RightShip sites, or at work-related events, unless this has been pre-approved and, in that event, the consumption is reasonable.
- > smoke in undesignated areas on site or at work-related events.
- > have illegal drugs in our possession when on or in RightShip sites or at work-related events.
- > assume that someone else will report a safety risk or speak up.



We are good corporate citizens

RightShip's mission includes charting a safe, sustainable and socially conscious future for the maritime industry.

To endorse this, RightShip expects all employees, suppliers, stakeholders and any other person or organisation that performs work for, or on behalf, of RightShip to understand the potential environmental impacts of any tasks performed. They should aim to avoid or minimise actual or potential environmental incidents.

This includes:

- > identifying and reporting any hazards that come to our attention, such as those which arise from biological and chemical substances or accidents including a spillage or release of material.
- > sharing opportunities or ideas to reduce greenhouse gas emissions, including by improving energy efficiency.
- > encouraging our suppliers, partners, customers and other third parties to minimise their environmental impacts.

We always

- > respect the cultures and customs of the communities and countries in which we operate if they do not conflict with our Code or the law.
- > take the views and expectations of all stakeholders (within reason) into account when decision making.
- > investigate concerns and complaints and report outcomes back to relevant stakeholders.
- > accurately and truthfully disclose the nature and purpose of funding requests, the risk profile associated with funding and any conflicts of interest that may exist.
- > ensure when committing to a community development project or donation:
 - > there are clear and distinguishable obligations and key performance indicators in the agreement.
 - > there are appropriate governance arrangements and contractual protections in place.
 - > the contributions do not inappropriately benefit any government official or close relative of a government official.
- > immediately stop any work that may contribute to a significant environmental or community incident.
- > report to our manager any actual or potential impact to the environment or communities from an accident, incident, spill or release of material.

We never

- > offer, promise or approve expenditure for a community development project, sponsorship or donation for, or on behalf of, RightShip where we have an undisclosed potential conflict of interest.
- > intentionally favor individuals from one political, religious or ethnic group based on their membership of that group.



We use social media wisely

RightShip understands that social media is a common and prevalent source of communication and includes text, audio, video, images, and other multimedia content.

The behaviour of employees, customers or clients, suppliers, or other third parties and stakeholders online must be consistent with RightShip's policies, procedures and values.

You will be held accountable for anything published which breaches any of RightShip's policies or procedures.

RightShip expects that any social media content or activity is appropriate in that it does not convey:

- > information that is confidential or private to RightShip.
- > capable of being regarded as offensive, derogatory or discriminatory, including in relation to any person or third party associated with RightShip.
- > a position that may be harmful to the reputation of RightShip or anyone connected to RightShip.

Depending on a person's role, they may be perceived as a RightShip representative or spokesperson.

As such, it is important to avoid activity that could result in any negative consequences for RightShip and you, including content that is inaccurate or misleading.

Unless authorised by RightShip, a person is prohibited from communicating (or being perceived as communicating) on behalf of RightShip via social media expressing an official position including by using RightShip's company logo and trademarks.

We always

- > encourage positive stories about employees, customers, and projects. Make sure we are not violating privacy but sharing positive content creates a great vibe.
- > discuss the do's and don'ts with our teams. It can harness the power of social media and create accountability.

We never

- > share proprietary information. Every company has information they would rather keep from the public and/or their competitors. Make sure our colleagues know when specific pieces of information are not to be shared.
- > share confidential information. Discussing financial information or contact information can severely irritate clients, employees, and others. Discussing health information can sometimes be a criminal offence. A good rule of thumb is never to share information that is not about you.
- > make derogatory comments about employers or their practices. Everyone wants to vent about workplace situations occasionally, but negative comments can result in disciplinary action. Negative comments that are untrue can get you sued.
- > make derogatory comments about customers.
- > make derogatory comments about our competition. Even if a competitor attacks publicly, taking the high road will always prevail.



We act when we are concerned

Any breach of our Code is a serious matter and may give rise to disciplinary action, including dismissal or legal action.

We encourage anyone to report their concerns to management before a breach of our Code occurs.

Equally, you should never conceal wrong-doings or ignore concerns. All information provided will be kept confidential to the greatest extent possible.

Any allegations concerning breaches of our Code will be investigated by RightShip.

Details of any investigation will be kept confidential and only shared on a strict need-to-know basis, unless RightShip is legally obliged to provide details to a third party.



Zero tolerance for retaliation

It is important that you feel empowered and protected to seek assistance or speak up.

We do not allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up (unless it is established that the relevant report was made vexatiously) or cooperating with an investigation.

Retaliation can take many different forms, including threats, intimidation, harassment, exclusion or humiliation.

It can also include subtle behaviours, such as withholding information or not providing meaningful work. We consider all forms of retaliation to be a breach of our Code.

If you feel that you have been retaliated against for speaking up you should report it immediately to your manager, HR or member of the Leadership Team.

Useful documents

HR Policies

Gift Registry

Conflict of Interest Registry

Policy ownership and review

This policy is owned by the Chief Executive Officer.

This policy requires the annual approval of the RightShip Board of Directors.

Procedural Version Control

No	Date approved	Date Effective	Section Amended	Authorised by
1	May 2023		Update and revision	CEO