

A black and white photograph of two crew members on a boat. They are both wearing helmets and life jackets. The person on the left is a woman with a wide smile, and the person on the right is a man with a beard, also smiling. The background shows the water of the sea and the structure of the boat. A white rectangular box with a thin black border is centered over the image, containing the title and subtitle.

CODE OF CONDUCT

Safe at Sea AB



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The Safe at Sea Code of Conduct, updated July 2016, defines how we behave and the way in which we run our business. It is our guide for acting responsible and for doing the right things. Our Code of Conduct is founded on our values and clarifies the ethics and compliance expectations for Safe at Seas own organization as well as our agents and distributors.

For a company such as ours to be consistently successful, it is vital that each and every one of us, when performing our duties, or when we are perceived to represent Safe at Sea, acts in an economically, socially and ethically responsible way. This is the only way to ensure a positive and sustainable financial and social development. It's the only way to ensure trust. Full compliance with all applicable laws and regulations is a fundamental minimum requirement of our Code of Conduct. We also adhere to international standards and guidelines such as the United Nation's Global Compact's Ten Principles as well as the ILO Declaration on Fundamental Principles and Rights at Work.

1. DISCRIMINATION

As defined in *ILO declaration on Fundamental Principles and Rights at Work*, discrimination in employment or occupation may be direct or indirect. Direct discrimination exists when laws, rules or practices explicitly cite a particular ground, such as sex, race, etc. to deny equal opportunities. Discrimination on the basis of race, colour, creed, religion, sex, marital status, sexual orientation, public assistance status, disability, age, or national origin, are forbidden by Safe at Sea. Additionally, discrimination on the basis of political opinions or affiliation with any union or other organization representing the interest of public employees is forbidden by Safe at Sea Ab. This means that it is unlawful for any employee, agent or distributor, on the basis of prohibited discrimination, to refuse to hire an individual; maintain a system of employment that unreasonably excludes an individual from employment; discharge an individual; or discriminate against an individual with respect to hire, employment terms, promotion, or privileges of employment. An employee, agent or distributor of Safe at Sea may not encourage or compel, or attempt to encourage or compel, any action covered by this section.

2 HEALTH AND SAFETY

The *ILO Constitution* sets forth the principle that workers should be protected from sickness, disease and injury arising from their employment. As such, Safe at Sea AB expects all employees, agents or distributors to provide a safe workplace to its employees. Safe at Sea AB expects that the occupational health and safety of employees is a priority for the agent or distributor throughout all significant aspects of its activities. As a minimum, the agent or distributor must comply with all applicable health and safety laws, regulations and standards. The agent or distributor shall take appropriate action, such as policies, standards, procedures, contingency measures and management systems, in order to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to its employees. Furthermore, Safe at Sea AB expects that all agents and distributors communicate to its management, employees and own agents and distributors the commitment to improving health and safety, and to provide training on such commitment. Safe at Sea AB also expect all agents and distributors to



systematically evaluate its health and safety performance through appropriate audits and report progress.

3 PAYMENT

As defined in *ILO's Convention concerning the Protection of Wages*, the term wages means remuneration or earnings, however designated or calculated, capable of being expressed in terms of money and fixed by mutual agreement or by national laws or regulations, which are payable in virtue of a written or unwritten contract of employment by an employer to an employed person for work done or to be done or for services rendered or to be rendered. Safe at Sea AB expects its agents and distributors to comply with legal minimum standards or industry benchmark standards concerning wages and benefits, whichever is higher. In any case, the agent or distributor shall always provide a "living wage", which enables workers to meet the basic needs of themselves and their dependents, as well as provide some discretionary income. Overtime shall be remunerated at a premium rate. Wages shall be paid in legal tender and on a regular basis. Deductions from wages shall be transparent and must never be used as a disciplinary measure.

4 CORRUPTION

Safe at Sea AB expects all its employees, agents and distributors to promote integrity and ethics in all aspects of their activities. Safe at Sea AB expects the employees, agents and distributors to comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and extortion. Furthermore, the employee, agent or distributor must never make or approve an illegal payment to anyone under any circumstances. Agents and distributors who themselves use agents or distributors when marketing Safe at Sea AB's products must ensure that Safe at Sea AB's policies in regards to corruption is implemented in their agent's or distributor's organization.

5 CRIMINAL ACTIVITY

Safe at Sea AB expects all employees, agents or distributors to conduct their operations in compliance to local and international law and to report suspicions of criminal activity, such as fraud, money laundering, tax evasion, and or other illegal business activities.

6 ENVIRONMENT

In accordance with *IFC's Sustainability Framework* which articulates the Corporation's strategic commitment to sustainable development, Safe at Sea AB expects its employees, agents and distributors to conduct their operations in a sustainable way and in compliance with the environmental laws and regulations. Safe at Sea AB expects that environmental aspects is a priority for the employee, agent or distributor in all significant activities. As a minimum, the employee, agent or distributor must comply with all applicable environmental laws, regulations and standards. The employee, agent or distributor shall strive to reduce the impacts of its activities on the environment and work towards adopting any appropriate policy, standard, procedure, contingency measure and management system in order to ensure that its operations are managed ecologically and in a sustainable way.

7 LABOUR CONTRACTS

Safe at Sea expects its agents and distributors to provide all workers with a written, understandable, and legally binding labour contract. The agent or distributor shall not rely on part-time, short-term or casual labourers, trainees or false apprenticeships to pay lower wages and fewer benefits. Provisions for non-permanent and seasonal workers should be no less favourable than for permanent workers.



8 LEAVE AND WORK HOURS

Safe at Sea AB expect all agents and distributors to follow a work week of 40 hours and grant employees paid holiday and sick leave each year, as well as parental leave to employees who must care for a new-born or newly adopted child. Women, who take maternity leave, must not face dismissal or threat of dismissal, and shall be able to return to work in their former employment at the same rate of pay and benefits.

9 SOCIAL RESPONSIBILITY

In accordance with *ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy*, Safe at Sea AB expects all agents and distributors to respect the law and international labour standards. Safe at Sea AB encourages agents and distributors to consult with governments, employers and workers organizations to extend equality of opportunity and treatment in employment. Safe at Sea AB expect all agents and distributors to invest in the skills of their employees, as well as to actively promote partnerships for skills development with local institutions. Safe at Sea also expect all agents and distributors to respect the right of freedom of association and the right to collective bargaining, provide support to representative employers and workers organizations as well as provide for regular consultation on matters of mutual concern.

10 IMPLEMENTATION OF THE SAFE AT SEA CODE OF CONDUCT

All employees are obliged to follow the Code of Conduct and no one in the organization has the mandate to authorize exceptions from the Code of Conduct.

Safe at Sea Management shall supervise the observance of the Code of Conduct. Safe at Sea will not accept any deviations from the Code of Conduct, and will investigate and take appropriate measures in case of misconduct.

11 REPORTING AND VERIFICATION

Safe at Sea depends on its employees, agents and distributors to ensure that the highest standards of ethical conduct are maintained. We shall all be vigilant in preventing, detecting and reporting misconduct. If you become aware of any decisions, behavior or actions that are not in line with the Code of Conduct, you shall report this to your immediate manager and/or to the Safe at Sea management at kaj.lehtovaara@safeatsea.se.

You are encouraged to sign the e-mail with your name in order for Safe at Sea to be able to contact you for clarifications and additional information. All reports will be treated in strictest confidence and Safe at Sea will not allow any retaliation towards anyone raising concerns or problems in good faith.



12 MONITORING

We reserve the right to make unannounced visits to all units representing or marketing goods or services for Safe at Sea, at any time. We also reserve the right to appoint an independent third party of our choice to conduct audits in order to evaluate compliance with our Code of Conduct.

During audits we require unrestricted access to all areas of the premises, to all documents and to all employees for interviews. We also demand the right to provide employees with contact details for Safe at Sea.

Kaj Lehtovaara – CEO, Safe at Sea AB

2015-07-16