

CODE OF CONDUCT

Code of Conduct

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Introduction

As global agents WaterFront Maritime Services prides itself on being your maritime services partner. Working with many of the best-known names in the maritime sector, WaterFront Maritime Service has established a solid reputation based on integrity, consistency and competency, providing high quality services in compliance with all relevant laws. This Code of Conduct establishes some key principals that apply throughout WaterFront Maritime Service's business activities as well as to its Directors and Employees. These principles relate to:

- Corporate Social Responsibility
- Business Ethics
- Anti-Corruption and Bribery
- Trade Compliance
- Employees' Conduct and Workplace Environment
- Health, Safety, Environment and Quality

Corporate Social Responsibility

- WaterFront Maritime Service strives to be a successful, growing, profitable business whilst at the same time, seeking to do right by those who work for and with the company.
- We respect the Universal Declaration of Human Rights and seek to be guided by its provisions in the conduct of our business.
- We have implemented and apply numerous stringent controls on matters of Corporate Governance such as Anti-Corruption and Bribery, Trade Compliance and Health, Safety, Environment and Quality.
- In delivering high quality ethical services, we strive for integrity, competence, trust, performance and accountability.
- We look to contribute positively to all the communities where we operate.

<http://www.un.org/en/universal-declaration-human-rights/index.html>

Business Ethics

- Conduct our business with integrity, competence and consistency.
- Maintaining the highest standards of professionalism in all dealings with others.
- Seek to achieve mutually beneficial business relationships with customers, suppliers and all other business partners.
- Customer, supplier and all other business partners' privacy is to be respected and their data protected.
- Ensure that customers, suppliers and all other business partners are familiar with the Code and its key Principles.
- Free and open competition.
- We retain the moral rights in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the moral and intellectual copyright vested in our clients' intellectual property.

Anti-Corruption & Bribery

- WaterFront Maritime Service, its subsidiaries and affiliates is committed to acting ethically and in full compliance with applicable anti-bribery laws and regulations always.
- As part of this commitment, it is the fundamental policy of WaterFront Maritime Service to prohibit the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining or retaining any business advantage.
- This policy applies to all Employees of WaterFront Maritime Service plus all business partners.
- New employees will receive training on this policy as part of the induction process. All existing employees with receive regular and appropriate training on how to implement and adhere to this policy.
- Training will also be extended to business partners.
- WaterFront Maritime Service is an associate member of the Maritime Anti-Corruption Network (MACN), a global business network comprised of like-minded companies committed to promoting compliance with anti-corruption law. MACN's vision is to work towards a maritime industry free of corruption that enables fair trade to the benefit of society at large.
- WaterFront Maritime Service is also a member of TRACE International, a non-profit business association, founded by anti- bribery compliance experts with an objective to set a common standard for due diligence reviews of commercial intermediaries and anti-bribery training for the global supply chain.

Trade Compliance

- WaterFront Maritime Service, its subsidiaries and affiliates, is committed to full compliance with all applicable laws governing international trade transactions and activities.
- This policy applies to all Employees of WaterFront Maritime Service plus all business partners.
- New employees will receive training on this policy as part of the induction process. All existing employees will receive regular and appropriate training on how to implement and adhere to this policy.

Employees' Conduct and Workplace Environment

- Employees must comply with all legal requirements and understand the major laws and regulations that apply to their work.
- Where no legislation or rules govern personal conduct, employees must consult with their Management for guidance.
- Employees must avoid activities that conflict with WaterFront Maritime Service's interests. They are obliged to report any actual or possible conflict of interest to their Management for further review.
- WaterFront Maritime Service employees shall perform their work without the influence of alcohol or drugs.
- WaterFront Maritime Service promotes equal opportunity in its hiring practices, making recruitment decisions based solely on job-related criteria and does not use forced or under-age labour.
- Employees must treat each other, customers and all business partners with respect and dignity, ensuring that the working environment is free of harassment, bullying and discrimination.
- Employees are offered training opportunities relevant to the functions they perform.
- WaterFront Maritime Service respects employee privacy and protects applicable data accordingly.

Health, Safety, Quality and Environment (HSEQ)

- WaterFront Maritime Service is committed to operating in a manner that protects our employees and the environment; adheres, at the very minimum, to relevant government safety, environmental and health regulations; provides our customers with "value added" services so that they can further protect their employees, property and the environment.
- New employees will receive HSEQ training as part of their induction whilst existing employees will be provided with the appropriate resources and training, to ensure that they can undertake our operations to the required HSEQ standards.

Social Media

Employee use of social networking reflects on both the employee and the Company. The Company does not intend to restrict the employee's ability to have an online presence nor does it mandate what the employee can and cannot say online. It does however expect the employee to be responsible and accountable for what they post, just as if you said your posts out loud in public or published them in a newspaper. We provide these guidelines for appropriate online conduct.

Guidelines for Employees:

Never post any confidential, sensitive, personal or proprietary information about the company, its employees, or any of the Company's customers or potential customers.

In practice this can mean a few things. Obviously, we should never post our own or other peoples' sensitive personal, contractual or financial information online. From time to time we as a Company might post interesting pictures or videos of site, ship or port operations, but this also needs to be considered carefully. Although this sort of post can be great in terms of marketing impact, it can also contain client information of a personal or commercial sensitivity that we are not aware of. For that reason, we would ask all employees to refrain from posting content relating to operations unless senior management have cleared the material, and the client's authorisation is secured. This kind of material would normally be released via official WaterFront Maritime Services social media channels, after the required checks.

Keep personal and professional profiles separate.

Comments made in a private group, visible to friends and family, may not always be appropriate to professional life. It's good sense to ensure that your privacy settings are configured properly, but it's also important to appreciate that even private posts can be forwarded, and nothing is truly secure. Whatever goes online is often there permanently. It's also very important to ensure your passwords remain secure, as readers of posts will hold you directly accountable for anything that appears via your profile.

If you set up a social media profile for personal reasons, you should avoid linking it to your office email and making references to the Company (for instance including a link to our web site). It's good to see WaterFront Maritime Services enjoying positive exposure online, but bear in mind that like every Company, we have a 'brand', and the way we present ourselves needs to be managed and consistent. If you have content, you'd like to post using a 'professional' platform (i.e. LinkedIn), run this past your senior management first. No employees may create an "official" Company blog, social media page, website, or any other social or online media presence without prior written authorization from an Marketing Manager.

Always bear in mind the WaterFront Maritime Services Code of Conduct.

Always remember that when you post anything online, particularly anything that can be associated with the Company, you must ensure comments abide by and are in the spirit of the WaterFront Maritime Services Code of Conduct. There is also an absolute requirement to obey local laws, including those laws governing defamation, discrimination, harassment, and copyright.

The reality is that even if your comments or profile don't explicitly reference the Company, you are still associated with WaterFront Maritime Services through your employment, and just as in 'offline' life, its best to treat people with respect.

Social Media

Look out for online commentary that concerns the Company.

Hopefully when we see items posted by third parties concerning WaterFront Maritime Services, the views expressed are complimentary and positive. If, however you see comments online that are of a derogatory nature and are aimed at the Company or employees of the Company, do not respond. Please immediately escalate anything like this to your management. Whether the comments are fair or not, complaints or other negative comments need to be dealt with in a considered manner.

Make sure that readers know when the views expressed are your own.

If you are publishing personal blogs, employees should make clear to readers that the views expressed in those blogs are personal and are in no way the view of the Company.

No employees may create an “official” Company blog, social media page, website, or any other social or online media presence without prior written authorization from Marketing Manager.

Respect confidentiality.

Always work on the assumption that information shared internally is for internal communication only. Just because most correspondence is not marked as confidential; this does not mean it’s for external distribution. The fact is that we all send information to colleagues, clients and vendors, based on the assumption that it will only be shared with other colleagues that need the information to do their jobs.

Take responsibility.

Ultimately, we are as individuals responsible for our own actions. The Company has no desire to take punitive measures, but in serious cases, violation of these policy guidelines may be grounds for termination. Employees are encouraged to address any concerns or questions concerning these guidelines, or any violation of them, to Operations Director.

Ken Scheeper
Operation Director
Office: +971 4 552 0404
Mobile: +971 56 525 9578
eMail: Ken.Scheepers@WaterFront-ms.com