

ITS (UK) Ltd Code of Ethics and Business Conduct Policy

ITS (UK) Ltd – Operating Policy

ITS (UK) Ltd is dedicated to providing Blue Chip Shipping Companies with value engineering support, equipment and original spare parts. Our aim as a Marine Technical Trading Company is to provide our clients with a bespoke service to suit their exacting requirements and to exceed the high standards our clients expect. This is achieved by;

- Complying fully with the documented requirements of our clients
- Representing only Blue-Chip manufacturing companies
- Continually monitoring and improving our performance and capability whilst reducing problems
- Adopting processes and procedures to meet the specific needs of the marine industry
- Maintaining the highest standards of business ethics

Our philosophy over the past 30 years has been to treat our clients with respect and integrity at every level. In this way we have gained the trust of the most respected names in the industry. The procedures we have created to ensure this have been honed over many years and developed by consulting with our clients and adhering to their needs and striving to eliminate any issues that may arise thereby ensuring continual improvement.

ITS (UK) Ltd – Ethical Policy

To ensure that the company's business is conducted in accordance with legal requirements and respectable ethical standards the following guiding principles will apply;

- Compliance with appropriate legislation, regulations and codes of practice
- Discrimination, bullying or any other kind of harassment is not acceptable
- The concept of mutual respect will be one of our guiding principles. We aim to nurture an environment of trust and responsibility
- Employees are expected to abide by company rules and to be honest and considerate in their various roles
- Bribes, personal inducements or other inappropriate gestures will not be given to clients or accepted from suppliers or any other parties. Minor tokens such as seasonal or promotional gifts are allowed provided that they have no significant value and are not given in secrecy
- Company products and services will be fairly and accurately represented. No false or exaggerated claims will knowingly be made
- All customer orders are reviewed to ensure that they can be honoured prior to acceptance

- Confidential information and data will be securely stored and not passed on without permission
- The company does not contribute to political parties

ITS (UK) Ltd – Human Resources Policies:

Recruitment and Equal Opportunity Policy

The policy and practice of ITS (UK) Ltd requires that all potential applicants are afforded equal opportunities within employment and that entry into employment with ITS (UK) Ltd and progression within employment will be determined only by personal merit and the application of criteria which are related to the duties required to be carried out the office. In all cases, ability to perform the job will be the primary consideration. Subject to statutory provisions, no applicant or member of staff will be treated less favourably than another because of his or her sex, marital status, sexual orientation, racial group, or disability.

Grievance Policy

It is the policy of ITS (UK) Ltd to create a working environment where an individual will be happy and able to fulfil their potential. Should individuals experience situations and circumstances which give rise to unhappiness or discomfort they should first apply informally to the Managing Director. If the matter cannot be resolved through these discussions an independent arbiter will be consulted.

ITS (UK) Ltd – Business Continuity Policy

ITS (UK) Ltd have established and maintain a Business Continuity programme that aligns with ISO 9001:2015. We conduct an internal quarterly review of our Business Continuity requirements to ensure they reflect our current needs.

ITS (UK) Ltd are ISO 9001:2015 registered and are independently audited annually. Part of our audit is to confirm Business Continuity actions are in place, documented and achievable. We specifically ensure our company can continue to provide a full-service during a disruptive incident. Incidents may be caused by problems with IT, telephones, the building or external environment (such as weather).

Actions in Place

- We run two independent fibre broadband providers in case of failure of one of the services.
- We have a third-party IT company that handles all IT back up procedures
- We have set up the ability for us all to work remotely from our head office, should the need arise
- As a trading company, we are still able to communicate with our suppliers and indeed supply all our client's needs, in the event of our office being unusable.

- Regarding Staffing continuity, all traders are able to handle each other's workload.

ITS (UK) Ltd –Anti-Bribery & Anti-Corruption Policy

ITS (UK) Ltd is committed to conducting business in an ethical and honest manner. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships. ITS (UK) Ltd will not condone or tolerate any instance of unethical or unlawful behaviour. ITS (UK) Ltd only source original spares and equipment which are specified by our customer. We purchase from the original manufacture, or an approved supplier of the manufacture. We DO NOT supply cheaper alternatives or conduct business with unknown suppliers. We have pre-determined pricing with most of our suppliers.

- No one acting on ITS (UK) Ltd behalf shall directly or indirectly offer or receive bribes, kickbacks, gifts or other remuneration in order to achieve business or personal advantage.
- ITS (UK) Ltd does not participate in the giving of receiving of gifts or hospitality from customers or suppliers.

ITS (UK) Ltd is against any form of corruption and is committed to support and promote a business environment free of corruption and bribery. We are bound by the laws of the UK, including the Bribery Act 2010.

ITS (UK) Ltd – Conflicts of Interest & Due Diligence Policy

ITS (UK) Ltd is a family run business with one majority shareholder holder who holds no conflicting appointments or investments in any other companies. The senior staff within the business also hold smaller denomination shares and no conflicting roles or relationships outside of ITS (UK) Ltd. We pride ourselves with the highest standards of integrity, honesty, and fair dealing. We ensure the following situations are avoided:

- Accepting personal gifts, payments or services from those seeking to do business with ITS (UK) Ltd.
- Acting as a consultant to a competitor, customer or supplier of ITS (UK) Ltd
- Using ITS (UK) Ltd.'s name, customer or employee lists for any purpose other than ITS (UK) Ltd business or functions.
- Representing a customer, supplier or competitor, regardless of the nature of the services being provided, while employed by or representing ITS (UK) Ltd.
- Any activity or arrangement (direct or indirect) that could conflict, or may reasonably be viewed as conflicting, with your responsibilities to ITS (UK) Ltd and must be reported to the Managing Director.

ITS (UK) Ltd – Environmental Policy

- To minimise the companies Carbon Footprint

- Keep waste to a minimum by doing everything we reasonably can to prevent, reuse, recycle or recover waste (in that order)
- Sort and store waste securely
- Packaging must be kept to the minimum weight and volume needed to keep the product safe
- To use crating timber from sustainable sources
- To eliminate the use of polystyrene filling material
- To encourage staff to use public transport or cycle to the office
- To source and promote materials and products that are environmentally friendly
- To work towards a paperless environment
- To use energy efficient lighting
- To support national and regional wildlife organisation

ITS (UK) Ltd – Packing Policy

- ITS (UK) Ltd complies with legislation stipulating that all non-manufactured wood packaging materials such as crating, pallets, packing blocks etc. are required to be treated by Heat Treatment (HT) according to the annex 1 of International Standards for Phytosanitary Measures number 15 (ISPM15)
- All treated wood is to be stamped on 2 sides with the authorised mark which certifies the approved treatment
- ITS (UK) Ltd packing complies with the European Parliament and Council Directive 94/62/EC of 20th December 1994 on packaging and packaging waste
- Packaging must be kept to the minimum weight and volume needed to keep the product safe

ITS (UK) Ltd –Asbestos Declaration

In compliance with the provisions of the International Maritime Organization SOLAS convention ITS (UK) Ltd does not and will not distribute any product containing asbestos in any nature or form.

ITS (UK) Ltd – Health & Safety Policy

It is the policy of ITS (UK) Ltd to ensure that employees are not put at risk during the course of performing their role for the company within the office. ITS (UK) Ltd is responsible for their safety and the safety of those around them.

The following safety rules will be applied;

- Appropriate risk assessments will be undertaken before any task outside of normal daily routine is carried out
- Where applicable all employees will be trained and competent in the work they conduct
- All employees have a responsibility to stop any work that is considered unsafe and report any such danger to Management
- All employees have a duty of care to each other
- The document 'Rules of Safety' covers the relevant considerations for the ITS (UK) Ltd offices

ITS (UK) Ltd – Quality Policy

ITS (UK) Ltd is an ISO 9001:2015 (current version) certified Company. An electronic copy of our Quality certificate or manual is available upon request. Our annual audits are carried out by QMS International.

ITS (UK) Ltd operates to the seven Principles of Quality Management;

1. Customer Focus – Our success depends on customer satisfaction
2. Leadership – our top level of management establishes the direction of the company
3. Engagement of people – People are the essence of the company and training ensures they have the tools to do their jobs well and thereby contribute to the success of the company
4. Process approach – our daily activities are guided by our documented processes
5. Improvement – It is our permanent objective to improve working on SMART objectives
6. Evidence based decisions – We work on Root Cause Analysis if data reveals underperforming areas
7. Relationship Management – We identify and select suppliers that manage costs and create value

ITS (UK) Ltd – Modern Slavery Policy

ITS (UK) Ltd will not tolerate behaviour or threats that may amount to modern slavery, human trafficking, forced labour and or similar human rights abuses in our own operation or in our supply chains.

We are also committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

The prevention, detection and reporting of modern slavery in any part of our supply chain is the responsibility of all those working for us and on our behalf. If we find that other individuals or organisations working on our behalf have breached this policy, we will take the appropriate action. We will only represent suppliers whose Code of Conduct is in alignment with our own.