

D6.2 ETHICS PLAN

DELIVERABLE DESCRIPTION

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Authors	Kati Lehtoranta, Riikka Ikonen, Jukka-Pekka Jalkanen, Mark Kevenaar, Dominique Pons, Sören Hedvik, Visintin Andrea, Markus Zehnder, Alexander Stroem, Stephane Boyer, Asya Al Marhubi, Roberta Del Prete
Reviewers	Riikka Ikonen (VTT)
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GREEN RAY Consortium

VTT (Teknologian Tutkimuskeskus VTT Oy)

FMI (Ilmatieteen Laitos)

Shell (Shell Global Solutions International BV)

CdA (Chantiers De L'Atlantique)

WIT (Wärtsilä Italia Spa)

WFI (Wärtsilä Finland Oy)

DNV (DNV AS)

MSCMYM (MSC Malta Yard Management Ltd)

CMA (CMA Ships)

WSCH (Wärtsilä Services Switzerland AG)

MSC (MSC Cruise Management UK Limited)

REV (Revolve Water)

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1. Introduction

The Ethics Plan is a strategic document describing all the potential ethical issues relevant to the GREEN RAY project. The aim is to ensure that the provisions on ethics regulation and rules are respected. Ethics and data management are important for quality assurance in the GREEN RAY project, therefore the Ethics Plan aims to describe all the relevant ethical issues, including Health, Safety, Security and Environment (HSSE) to the project, and present all the procedures to be followed by the consortium partners working in the project. This document complements the Project Quality Management Plan and Data Management Plan.

The GREEN RAY project will follow the ethics appraisal procedure in Horizon Europe. VTT, the project coordinator, will act as Ethics mentor monitoring the ethics issues involved in the project and how they are handled. All the relevant ethics issues are brought to the knowledge of the Management Committee and the General Assembly of the GREEN RAY project. The Ethics Plan will be a document that is updated when needed.

2. Ethics in GREEN RAY

2.1. Main ethics issues in GREEN RAY

During the preparation of the GREEN RAY project an Ethics self-assessment was conducted according to the Horizon Europe procedures and no major ethics issues were defined. The only questions in the assessment answered “yes” were related to involvement of non-EU countries and safety and security. This section describes those issues although they do not raise any special ethics concern in the project. Moreover, procedures for handling personal data are described as potential issue occurring during the project.

NON-EU countries

Part of GREEN RAY activities will be carried on in the following non-EU Countries: Switzerland, United Kingdom. These activities include: Development of retrofittable 2S engine by partner WSCH. Demonstration of new generation 4S engine onboard partner MSC's vessel. Thus, the foreseen activities to be implemented in non-EU countries do not raise any particular Ethics concern per se: no controversial research methods or technologies are involved, no risks of discrimination or stigmatisation for people involved in such activities, etc.

Safety and security

The GREEN RAY activities involve catalyst handling. In general, catalyst handling and disposal will be done in a very controlled environment, under a strict regulatory regime, minimizing the chance of damage to human health and/or the environment. The re-use of noble metals from spent catalyst supports a circular economy and helps the project economics. European REACH regulation (EC 1907/2006) will be adhered.

GREEN RAY does not raise considerable risks to health and safety of researchers and participant and does not involve the use of potentially harmful substances, processes, technologies, organisms or materials in a manner that raises significant concerns about individual security or safety or the protection of public health.

Data management

The GREEN RAY project does not foresee activities in which personal data would be collected. However, the project is prepared if some activities would involve collecting such data. In that case, the access to personal data of the volunteers (E.g. some workshops to be held in the project or surveys) is limited to the dedicated partners' employees who have a need to know for the purposes of the research. If there is a processor processing personal data on behalf of any controller, said controller is responsible for entering into a data processing agreement with said processor and providing legally required information to the data subjects.

All partners that are involved in processing volunteers' data are accountable for the compliance with the applicable legislative requirements. The data management plan of the GREEN RAY project, including the personal data protection protocols, are described in Deliverable 6.3.

2.2. Compliance with ethical principles and relevant legislations

The GREEN RAY project complies with 'ethical principles and relevant national, European Union and international legislation.

NON-EU countries

GREEN RAY activities outside EU will increase relevance and impact of the projects and its results while they are not meant to take advantage of different legislation, standards or local resources. In fact, countries Switzerland and United Kingdom ensure standards for research participants and local staff similar to those of the EU counterparts.

Safety and security

The GREEN RAY project does not involve activities or results raising security issues. All the developments within the project will be used only for civil applications. The consortium therefore confirms that clause 37 "activities including dual use" is not selected for the GAP and the project does not involved 'EU-classified information' as background or results."

The methodology and activities of GREEN RAY are planned taking into consideration 'do no significant harm' principle as per Article 17 of Regulation (EU) No 2020/852 on the establishment of a framework to facilitate sustainable investment (i.e. the so-called 'EU Taxonomy Regulation'). The methodology is designed in a way it is not significantly harming any of the six environmental objectives of the EU Taxonomy Regulation. GREEN RAY will demonstrate a catalytic after-treatment system to achieve considerable methane slip reduction and thus the long-term environmental benefits will be generated. The goal of GREEN RAY is to positively address the DNSH principles such as pollution prevention and control, sustainable use and protection of water and marine resources as well as climate change mitigation.

Data management

The consortium guarantees that all possible personal data collected during the project will be kept secure and unreachable by unauthorized persons. The data will be handled with appropriate confidentiality and technical security, as required by law in the individual countries and EU laws and recommendations. It should be noted that all the organizations that participate in the consortium have in place their own data privacy and security policies, which are compliant with EU regulations.

All activities will be carried out ensuring ethical principles in accordance with Directive 95/46/EC of the European Parliament, about the protection of individuals with regard to the processing of personal data and on the free movement of such data, as well as DIRECTIVE 2002/58/EC, concerning the processing of personal data and the protection of privacy in the electronic communications sector, as modified by Directive 2009/136/EC. Particularly important is also the General Data Protection Regulation (GDPR) (Regulation EU) 2016/679) that is a regulation by which the European Parliament, the European Council and the European Commission intend to strengthen and unify data protection for individuals within the European Union (EU). All national data protection and privacy laws for pilot countries will be also followed.

2.3. HSSE in GREEN RAY

GREEN RAY takes seriously the HSSE (Health, Safety, Security, Environment) issues that may occur during the demonstrations or other project activities.

Appropriate occupational health and safety will be followed by all researchers in the GREEN RAY project. VTT (Coordinator) complies with National and European legislation on Protection of Environment and Occupational Safety.

It is agreed within the Consortium agreement that partners undertake to employ reasonable standards for promoting health, safety, security and the environmental (“HSSE”) sound working environments for their respective personnel and work sites. All partners shall exercise reasonable care and skill when implementing the project at the premises or vessel of any partner. Access to such premises or vessel will require complying with or carrying out any health, safety, environmental and/or security instructions, policies and/or training by that partner.

In table below we have collected information about the HSSE related guidance from all the partners. This shows that these issues are taken seriously by all partners and also when doing the project work these guidelines are followed. In case one partner is doing the project work in the premises (or vessel) of another partner, it needs to obey any HSSE rules relevant on those premises or vessel. Detailed guidance and/or training is to be given to those persons that need to work in the premises or vessel of another partner.

PARTNER	HSSE RELATED GUIDANCE
VTT	<p>VTT’s Code of Conduct explicitly highlight the significance of responsible and ethical business. This covers the quality and reliability of the research results, the way we interact with our partners, paying special attention to occupational safety and environmental issues etc.</p> <p>Our ethical norms are based on impartiality, reliability, integrity and responsibility. In our research operations, we follow national and international guidelines for good scientific principles (RCR, Responsible conduct of research).</p> <p>Our security measures ensure uninterrupted operations and protect our personnel, property, information, premises and the environment from accidents, damage and crime under all circumstances. We pay special attention to data security. We take into consideration national and international security policy programmes.</p> <p>VTT requires a high level of safety in all its operations. VTT has the target of zero accidents which also means no occupational diseases, no harassment and no burnouts. VTT has safety instructions for all VTTers and OHS (Occupational Health and Safety) guidance on shared workplace for all third-party companies and their employees working independently on VTT’s premises. Valid Occupational Safety Card is required from all persons working at experimental premises. VTT is ISO 45001 (Occupational health and safety management system) certified.</p> <p>At the core of VTT’s sustainability is the sustainability and effectiveness of the solutions we develop. The goal is to have a positive handprint to ensure that solutions really improve the world, not just minimise side effects. Our research choices are based on the UN Sustainable Development Goals, SDGs. VTT’s goal is to be carbon neutral by 2030. In procurement we favour products with lower impact on environment when feasible. Our research choices contribute to the conservation of biodiversity. We report on corporate responsibility applying the Global Reporting Initiative (GRI) guidelines. VTT is ISO14001 certified.</p>
FMI	<p>FMI code of conduct defines rules for responsible behavior, and equality which all employees are required to follow. Inappropriate treatment, harassment or bullying of any kind are not tolerated.</p>

Safety and security measures facilitate 24/7 operational readiness of various services FMI provides for general public and national authorities. Access control to premises and facility services ensure that security measures are applied to all personnel working or visiting the FMI premises.

FMI obtained the WWF Green Office certificate in 2008 and has maintained a high level of environmental performance since. The requirements of GO certificate include strong commitment to reduce environmental footprint of premises and all personnel working at FMI.

FMI is currently revising its ethics guidance based on the feedback of an external review. This revision is expected to be completed by the end of 2022.

Shell Our Values. At Shell, we share a set of core values – honesty, integrity and respect for people – which underpin all the work we do. The Shell General Business Principles, Code of Conduct and Ethics and Compliance Manual help everyone at Shell act in line with these values and comply with relevant laws and regulations.

The Shell General Business Principles are central to how we conduct our business and living by them is crucial to our continued success. We are judged by how we act and how we live up to our core values of honesty, integrity and respect for people. Our Business Principles are based on these. They promote trust, openness, teamwork and professionalism, as well as pride in what we do and how we conduct business. We were one of the first global companies to state and share our beliefs when we published our General Business Principles in 1976. As part of these principles, we commit to contribute to sustainable development, balancing short and long-term interests and integrating economic, environmental and social considerations into our decision-making. All Shell employees and contractors, and those at joint ventures we operate, are expected to understand and continually behave in line with our Business Principles. We expect suppliers, and joint ventures that we do not operate, to apply equivalent principles.

Our Code of Conduct supports every employee, contract staff and contractor who works for or on behalf of Shell. It sets out expected behaviours of our employees and how they relate to our Business Principles and Core Values.

Our Ethics and Compliance Manual builds on the Shell General Business Principles and the Shell Code of Conduct to provide practical advice on how to comply with laws and regulations and how to relate to customers, communities and colleagues. The Ethics and Compliance Manual offers detailed guidance on being compliant, helping our staff do the right thing every day.

Powering Progress sets out our strategy to accelerate the transition of our business to net-zero emissions. It is designed to create value for our shareholders, customers and wider society. Powering Progress has four main goals in support of our purpose, to power progress together by providing more and cleaner energy solutions.

- *Powering Progress generates value for our shareholders. It provides the financial strength to transform our company as the world makes the transition to cleaner energy.*
- *It focuses on working with our customers and across sectors to accelerate the transition to net-zero emissions, in step with society. A net-zero world is where society stops adding to the total amount of greenhouse gases in the atmosphere.*

- *Powering Progress means powering lives and livelihoods through our products and activities, and by supporting an inclusive society.*
- *It also means respecting nature by protecting the environment, reducing waste and making a positive contribution to biodiversity.*

Powering Progress is underpinned by our core values of honesty, integrity and respect for people, and our focus on safety. This includes our commitment to doing business in an ethical and transparent way. Safety is central to our Powering Progress strategy. We aim to do no harm to people and to have no leaks across our operations. We call this our Goal Zero ambition.

Personal Safety. Our people often work in demanding roles and extreme conditions. They may have many different hazards to manage, whether in offshore locations, construction work in remote locations, or the transport of people, equipment and products. Whatever they do, they always ensure that they can operate safely before they start work.

Safety is our top priority every day, and each year we run an annual Safety Day that gives our employees and contractors the opportunity to learn how they can manage the safety hazards in their work and share ideas with each other. We aim to create a culture where for any given task people plan, brief, execute and debrief work. Whether we are staff or contractor executing the work at the frontline, an operational leader supervising the work or in an office planning the work, we all have a role to play to make Goal Zero real.

In 2021, we moved from the Shell Life-Saving Rules, which we adopted in 2009, to the International Association of Oil & Gas Producers (IOGP) Life-Saving Rules. We believe that the industry rules, which are widely used, will make a difference to safety on the frontline. For example, analysis of historical safety incidents at Shell-operated ventures and emerging data from our new Serious Injury and Fatality (SIF) metric shows that many of our most serious events relate to line of fire. The new “line of fire” rule will help staff and contractors to keep out of the way of potential danger, such as from vehicles, moving or dropped objects or possible pressure releases. With the introduction of the industry Life-Saving Rules we’re demonstrating an interest to learn and improve. And if something goes wrong, learning what happened and “why” is more important than “who”. The new Life-Saving Rules were launched during our annual Safety Day in September 2021. By year’s end more than 100,000 of our employees and contractors had completed the mandatory training.

Process Safety. Process safety starts at the early design phase of building facilities and continues throughout their life cycle, making sure they are operated safely, well maintained and inspected regularly to identify and deal with any potential process safety hazards. We make sure our facilities are well designed, safely operated and properly maintained to prevent leaks of hazardous materials. More information can be found in our Annual report or our Sustainability report.

- *Clear global standards. Our global standards and operating procedures define our expectations for the controls and physical barriers required to reduce the risks of incidents. For example, offshore wells must be designed with at least two independent barriers in the direction of flow, in order to reduce the risk of an uncontrolled release of hydrocarbons. We regularly inspect, test and maintain these barriers to ensure they meet our standards. We take a dual approach to potential incidents. We identify and assess risks that have the potential to become an incident and take the necessary steps to mitigate or eliminate them. At the same time, we prepare for, and are ready to respond to, incidents that occur. We learn from investigations into industry incidents and embed this knowledge into our*

technical safety standards. Our training programmes help to create a working culture that increases risk awareness and prevents safety incidents.

- *Preparing for emergencies. We routinely prepare and practise our emergency response to potential incidents such as a spill or a fire. This involves working closely with local services and regulatory agencies to jointly test our plans and procedures. These tests continually improve our readiness to respond. If an incident does occur, we have procedures to reduce the impact on people and the environment.*
- *Spills prevention and management. Large spills of crude oil, oil products and chemicals associated with our operations can harm the environment, and result in major clean-up costs, fines and other damages. We have requirements and procedures designed to prevent spills. We design, operate and maintain our facilities with the intention of avoiding spills. To further reduce the risk of spills, Shell has routine programmes to reduce failures and maintain the reliability of facilities and pipelines. We are also involved in several industry consortia formed to improve well-containment capabilities such as the Marine Well Containment Company for the the Gulf of Mexico region and Oil Spill Response Limited, a global industry consortium. For oil spills, we have created a global response network that enables us to deal more effectively with oil spills, supplementing local response capability. We routinely perform large-scale exercises with local regulatory and response organisations to practice, and improve, our response capability.*
- *Using technology to improve process safety. We continue to increase our use of digital technologies – such as augmented reality, digital twins, robots and drones – to run safer operations and help our frontline workers. We believe digital technology can enhance our front-line workers safety and break a plateau in our safety performance to keep pursuing our Goal Zero ambition.*

Transport safety. Safety is a key concern for our road, maritime and aviation activities. Moving large numbers of people, products and equipment by road, rail, sea, and air poses safety risks. We develop best-practice standards within Shell and work with others, such as specialist contractors, industry bodies, non-governmental organisations, and governments, to reduce transport safety risks. Find out more about our road safety performance in 2021 in our [Annual Report](#) and our [Sustainability Report](#).

- *Road safety. Transportation is intrinsic to our business activities. While on business, Shell employees and contractors drive a combined distance of around 470 million kilometres (292 million miles) each year in more than 50 countries, including in remote locations. Our road safety approach focuses on driver skills and behaviour, as well as the condition of the vehicle, road and local environment. It is supported by our global road safety standards and includes routine audits of the road safety capabilities of our contractors as well as our mandatory defensive driving training course. In 2021, around 11,000 Shell employees and contractors completed some form of in-vehicle or virtual defensive driving training. Our employees and drivers are required to follow Shell's Life-Saving Rules. These include following a prescribed route for road journeys, wearing a seat belt, not using mobile phones or any other devices while driving and adhering to speed limits.*
- *Maritime Safety. Shell is one of the world's largest charterer of ships, with over 1,500 vessels associated with the business that transit the world's oceans and rivers each day. We have a company-wide ship quality assurance standard that is aimed at reducing safety incidents, accidents or oil spills from bulk transport ships. In 2012 Shell created its [Maritime Partners in Safety programme](#). This network of 500 maritime partners with whom Shell does business focuses on raising safety standards. Our partners include ship owners, supply boat operators, charterers and a range of others. Since its*

inception, this programme has led to better safety leadership and behaviour and has reduced the number of serious or potential incidents threefold.

- *Aviation Safety. With over 100 years of innovation, Shell aviation is present in approximately 60 countries and provides fuel for almost two million aircraft each year. Shell Aviation's customers range from the private pilot to the largest global airlines. Achieving and maintaining class-leading health, safety, security, environmental (HSSE) and product quality performance is our main priority. Shell Aircraft, a separate organisation from Shell Aviation, focuses directly on the safety of the passengers who fly on business for Shell. We operate and charter planes, helicopters, and drones for tasks such as monitoring pipelines, conducting geophysical surveys and transporting passengers and equipment. Shell Aircraft develops specific contractor safety requirements and works directly with aviation regulators and industry groups to support aviation safety improvements across the oil and gas business.*

CdA

Compliance with laws and regulations. Chantiers de l'Atlantique's aim is to act, under all circumstances, in accordance with the laws and regulations in force in all the countries in which the company operates. Chantiers de l'Atlantique is committed to ensuring that all its administrators, senior managers and employees conduct themselves with honesty and in accordance with the laws and regulations in force concerning, in particular, human rights, health and safety, environmental protection and corruption prevention, as well as those concerning competition and fiscal and financial regulations

Implementation of an ethics and integrity policy. Chantiers de l'Atlantique has implemented a code of conduct designed to accompany the company's strategic and operational decisions on a daily basis. This code lays down the principles, values and standards that must guide the actions and behaviour of Chantiers de l'Atlantique and of all the company's administrators, senior managers and employees, both internally and with regard to third parties. These rules do not under any circumstances replace the laws and regulations in force. Chantiers de l'Atlantique has established an "Ethics and Compliance" steering committee to monitor the arrangements implemented and ensure that they comply with the company's ethical principles, values and standards. This steering committee is responsible for regularly updating the mapping of corruption risks, the applicable procedures and training plans for use by employees. Chantiers de l'Atlantique undertakes to require all administrators, senior managers and employees to comply with these rules and procedures and, in particular, those aimed at preventing all forms of corruption, either passive or active, of public or private officials in the form of facilitation payments, gifts, rewards, invitations or other considerations aimed at third parties. Chantiers de l'Atlantique undertakes to encourage ethical behaviour within its organization.

Commitments with regard to business partners. Chantiers de l'Atlantique wants to establish sustainable relations with all its business partners. It undertakes to act in an honest, sincere and transparent manner in all its dealings with them. These relations are based on confidence and mutual respect in order to encourage innovation and performance at all levels of the value chain. Chantiers de l'Atlantique undertakes to take its customers' specifications into account and to submit clear, precise bids that meet their requirements. Chantiers de l'Atlantique undertakes to communicate clear and precise information to its co-contractors. Chantiers de l'Atlantique undertakes to develop and propose products that comply with current standards and with the quality requirements that the company has set itself. Chantiers de l'Atlantique undertakes to comply with the internal selection rules and those applicable to the management of relations with its co-contractors. Chantiers de l'Atlantique undertakes to treat co-contractors in an equitable and objective manner in competitive bidding. Chantiers de l'Atlantique undertakes to encourage cooperation between co-

contractors in order to promote the development of compliant products and systems that benefit all parties in terms of cost, quality and lead-times. Chantiers de l'Atlantique undertakes to meet the commitments made with regard to its co-contractors. Chantiers de l'Atlantique undertakes to maintain a constructive dialogue with all its partners on social and environmental questions and those concerning ethics and integrity in business relations. Chantiers de l'Atlantique undertakes to respect the materiel and technological assets of its business partners. Chantiers de l'Atlantique undertakes never to behave in a dishonest manner towards its competitors.

Employee relations. Chantiers de l'Atlantique is deeply committed to the principles of the Universal Declaration of Human Rights and to the principles of equal treatment and opportunities. Chantiers de l'Atlantique promotes equality of opportunities and places the fight against all forms of discrimination at the heart of its human resources management policy, whether associated with origins, lifestyle, gender, age, political or religious opinions, trades union membership or disabilities. It implements selection and human resources management processes that are transparent, objective and traceable. In order to guarantee the safety and protection of their personal data, the access rights to personal data are restricted and the gathering of personal data is limited to the strict minimum required for their employment and any consequent benefits. Finally, Chantiers de l'Atlantique undertakes to provide a working environment that complies with the legal provisions in force concerning matters of health and safety and the environment, the prevention of health and occupational risks and personnel training. Chantiers de l'Atlantique undertakes to require the company's employees to adhere to all the provisions that contribute to the development of the company's values.

Relations with the media and social networks. Chantiers de l'Atlantique takes great care to ensure that its image, organization, values and products are respected. All unauthorized communication of information may affect its reputation and seriously harm the company's interests and those of its shareholders. Relations with the media and social networks are the responsibility of the Communication Department. All declarations or replies to questions from the media or via social networks must pass through, or be coordinated by, the communication department. Relations with shareholders are the exclusive responsibility of the company's General Management. All Chantiers de l'Atlantique employees undertake to observe total discretion concerning Chantiers de l'Atlantique's activities and, under all circumstances, to abstain from making any statements that could harm the reputation of Chantiers de l'Atlantique or the integrity of its property or the confidentiality of its information. The publication of photos, videos or other information relating to the company's activities or products is forbidden unless prior written authorization has been received from the Communication Department. All unauthorized publication or distribution renders the employee breaking this rule responsible for his actions.

Respecting of Chantiers de l'Atlantique's assets and know-how. It is essential to protect Chantiers de l'Atlantique's tangible and intangible assets in order to strengthen the company's competitiveness and assure the long-term success of its activities. The administrators, senior managers and employees of Chantiers de l'Atlantique undertake to promote, enhance and protect all the company's property, including its intellectual property rights, and to protect Chantiers de l'Atlantique's confidential information. They shall take care, on a reciprocal basis, not to jeopardize other people's property.

Social and environmental responsibility. Chantiers de l'Atlantique prioritizes the maintenance and development of a responsible attitude, both collective and individual, in the fields of health and safety in the workplace. Its aim is to strictly apply regulations and establish elaborate risk prevention and management processes, training activities and tools and methods for measuring the efficiency and performance of its

actions. Chantiers de l'Atlantique also places environmental thinking at the heart of its innovations. Eco-design, energy management, on-board water management, the reduction of emissions into the air and waste management are the main strands of the R&D programme that it has been implementing for many years. The improvement of the company's productivity, through improvements in the working conditions of its employees and coproducers, is also at the heart of its concerns. Aware of the challenges and its local, regional and international outreach, Chantiers de l'Atlantique also makes a major contribution to important actions in the fields of education, training and research. It supports the economic development of local companies and aims to promote the development of the sector.

Truthfulness of accounting and financial information. The transparency and truthfulness of accounts is an essential element in gaining the confidence of all its partners and guaranteeing that business is conducted in accordance with the laws, accounting principles and other financial standards in force. Chantiers de l'Atlantique therefore accounts rigorously and accurately for all its transactions and assets. It establishes internal control rules and checks to ensure that these rules are complied with by all the company's employees. Chantiers de l'Atlantique ensures that the company's accounting and financial information is presented in an honest and efficient manner and checks that the accounting and financial information and forecasts are accurate and sincere and communicated with integrity and transparency.

Conflicts of interest – Integrity and loyalty of employees. Chantiers de l'Atlantique attaches fundamental importance to the ethical behaviour of its employees and checks to ensure that they comply with the rules in the Professional Ethics and Compliance Code of Conduct established within the company's organization. Chantiers de l'Atlantique checks to ensure that, by their behaviour and decisions, its employees contribute to the good reputation of Chantiers de l'Atlantique. It is up to them to behave in the interests of Chantiers de l'Atlantique and defend its values. Chantiers de l'Atlantique's employees shall only use Chantiers de l'Atlantique's resources and information to the exclusive benefit of Chantiers de l'Atlantique. They shall take care to ensure that their behaviour and decisions are free from personal conflicts of interest and shall be subject to the requirement to declare all conflicts of interest that may exist with the Chantiers de l'Atlantique's co-contractors, in accordance with the rules in force within the company. Any participation on their part in associations or politics must be compatible with their professional responsibilities and with the neutrality observed by Chantiers de l'Atlantique in matters related to politics, religion and philosophy. These activities must be carried out within a totally private context and must not interfere in any way with professional activities.

Gifts and hospitality. The question of gifts or hospitality received or offered must under no circumstances influence business decisions and company policy. That is why employees undertake to comply with the Gifts and Invitations policy laid down by Chantiers de l'Atlantique and agree to adopt prudent and irreproachable behaviour with regard to these questions. Any doubts or questions must be drawn to the attention of the line manager concerned.

- *Sanctions for failing to comply with the code of conduct. Any violation of this Code of Conduct compromises the relationship of trust established between the company and the person that fails to comply with the rules. All administrators, senior managers and employees must comply strictly and rigorously with the Code in the conduct of their business, in their managerial relationships and with regard to all the company's stakeholders. Any infringement shall render the person responsible liable to disciplinary sanctions and/or legal proceedings.*

Yearly updated CdA Professional Ethics And Compliance Code Of Conduct is available at <https://chantiers-atlantique.com/en/professional-ethics-and-compliance-code-of-conduct/>

WIT
WFI
WSCH

Protecting the environment, enhancing customer business, and contributing to a sustainable future is the essence of what we do. Our solutions and operations are safe, reliable, efficient, environmentally sound, and compliant with regulatory and other applicable requirements. We give the highest priority to preventing occupational injuries and illnesses by assuring safe and healthy workplaces in all of our business operations, and we authorise work to be stopped if conditions are considered unsafe, or if quality is being compromised. We set objectives and continually improve our QEHS performance. We actively eliminate defects and hazards, and reduce QEHS associated risks. We communicate and consult with employees and other relevant stakeholders to ensure that our QEHS practices are enforced and constantly improved. Our skilled organization acts as a responsible global citizen.

Wärtsilä Italia S.p.A., Wärtsilä Finland and Wärtsilä Services Switzerland are certified for following Standards:

- *ISO 9001:2015 - Quality Management Systems – Requirements*
- *ISO 14001:2015 - Environmental Management Systems - Requirements*
- *ISO 45001:2018 - Occupational health and safety management systems - Requirements*
- *ASA (EKAS6508) - Consultation of occupational physicians and other occupational safety specialists (WSCH only)*

The Classification Society in charge is Det Norske Veritas (DNV). Surveillance audits are conducted regular whereas re-certification audits take place every three years.

DNV Ethical framework and compliance policy

DNV is committed to the highest standards of integrity and ethical business conduct. Our Code of Conduct provides the framework for what we consider ethical, responsible and sustainable behaviour. It applies to everyone involved in DNV's business, and along with our purpose, vision and values, provides the foundation of our business ambition and all activities.

In addition, our suppliers have to accept Supplier Code of Conduct which states our expectations for suppliers on human rights and labour standards, anti-corruption as well as environmental performance.

We also reflect this approach in our statement according to section 54(1) of the United Kingdom's Modern Slavery Act 2015, published for every financial year. We expect our customers to conduct business in a fair, ethical and lawful manner and have ensured this by stating this in our general terms and conditions.

Ref to DNV management system Safety & Resilience DMSG 13-0 Safety and Resilience Policy

SAFETY AND RESILIENCE POLICY

In DNV, our work is never so urgent or important that we cannot take time to do it in a way that is safe and healthy. Our employees feel confident and empowered to stop work and to intervene where inappropriate behaviours or unacceptable conditions related to safety and health are encountered.

We are committed to protecting our employees' safety and health and to helping our employees develop their resilience. For DNV, resilience means that our employees have the ability to face day-to-day challenges, can adjust to change and uncertainty, recover from difficult conditions, and thrive. We invest in the physical, social and mental health of our employees to support their wellbeing and contribute to the development of their resilience.

We work to the principles of the UN's Global Compact, including Sustainability Development Goal 3 for Good health and wellbeing. We foster a culture, where we pursue, adopt and share good practices on establishing a safe and healthy work environment that fosters employee resilience. We comply with applicable legal and other international requirements, further challenging ourselves to build a future-fit safe and healthy work environment. To achieve this, we:

- *Proactively identify and assess risks to the safety and health of our employees and how these risks may influence our employees' resilience. We ensure that these risks are managed and that we prioritize areas for improvement.*
- *Visibly demonstrate leadership in safety and resilience, where all employees are actively engaged and involved in upholding our commitment to high standards of safety, health and resilience.*
- *Notify and report for the purpose of learning without being fearful of retaliation. We treat incidents, including near misses, and feedback from employees and customers as an opportunity to improve and to prevent similar adverse events from happening again. We take action if there is evidence of gross negligence and misconduct.*
- *Develop plans and implement to deliver continual improvement of how we manage as well as perform in safety, health and resilience.*
- *Openly share and evaluate our performance regarding safety, health and resilience, and we compare our achievements to our plans and objectives. We take action to address shortcomings.*
- *Select our sub-contractors and suppliers on the basis of their ability to provide services that meet our requirements to safety and health.*

MSCMYM The MSC group, which includes both MSC Malta Yard Management Limited and MSC Cruise Management (UK) Limited places health and safety, environmental, social and ethical considerations at the heart of all its operations and activities, particularly bearing in mind our ships are carrying tens of thousands of passengers and crew every day.

MSC

Relevant details are set out in depth on the MSC Cruises website and in our annual sustainability report, which can be found at <https://www.msccruises.co.uk/about/sustainability>. Some specific considerations are outlined below.

HEALTH & SAFETY

A cruise isn't just one of the most luxurious and relaxing ways to see the world, it's also one of the safest. That's because every cruise ship has to be built, equipped and operated in accordance with the strict

requirements of the international maritime treaty known as the Safety of Life at Sea (SOLAS) Convention, developed by the International Maritime Organization, the UN agency responsible for shipping.

As a result, for example, all cruise ships must have regularly-checked lifeboats, life rafts and life preservers for every person on board, plus a specified minimum additional capacity.

The ships in the MSC Cruises fleet go substantially above and beyond what is required, carrying backup mechanical, navigational and safety provisions. And of course, our crews undertake extensive training and refresher training, certification and regular drills for emergency situations, including the evacuation of a ship.

To ensure ongoing compliance with extensive rules and regulations, we work closely with external stakeholders, such as the Classification Societies, to ensure compliance with international and/or national statutory regulations on behalf of Flag States and local authorities. Our priority is to continuously review and adapt onboard safety practices and procedures ensuring that onboard safety for crew and guests is never compromised.

The policy of our company is to provide and maintain a safe and healthy workplace by ensuring that work equipment is safe and that a safe system of work is provided for all our employees. We will also provide suitable and sufficient information, instructions training and supervision as is necessary to ensure the health and safety of our employees and this shall include suitable and sufficient welfare, sanitary and working facilities as required.

All employees have a duty to ensure that they work in a safe manner and that their acts or omissions do not cause harm to themselves or others in the vicinity. Employees will be encouraged to bring to the attention of the management any concerns regarding any health and safety issues.

We recognise our duty of care towards others that are not in our employment. These people include: visitors and contractors who have reason to come into contact with our business activities and premises. These persons will be given suitable and sufficient information and instructions to ensure their health and safety. The actions of visitors and contractors will be controlled in such a way so as not to cause harm to our employees or themselves.

SUSTAINABILITY AND ENVIRONMENT

For us sustainability means protecting the environment, supporting the people who work with us and choose to travel with us, as well as the communities and places that we visit and do business with.

Our sustainability programme is organised around four key pillars: Planet, People, Place and Procurement. This translates into a drive to continuously improve our fleet's environmental performance; caring for all employees and promoting diversity and inclusion; working to ensure that our impact on the coastal communities that we reach remains positive; and responsibly sourcing the products and services that we purchase. To quote Mr Pierfrancesco Vago, Executive Chairman:

"We are steering a course towards a lower carbon future and, by 2050, will achieve net-zero greenhouse gas emissions"

Our policies seek to minimise the impact of our operations on the Environment through the pursuit of good business practises and by fulfilling our legal obligations. Our aim and objective is to provide and maintain a good environmental practice across our fleet and within our offices. Our environmental management system is documented, implemented, maintained, and communicated to all our employees.

We work with our suppliers and subcontractors to ensure that their policies are aligned with ours and that their representatives on site cooperate in supporting our company in achieving our goals,

BUSINESS CONDUCT AND ETHICS

Our Code of Business Conduct requires a high standard of business and personal ethics for all our employees and partners. Our conduct and ethics programmes are under constant review to reflect both changing regulatory environments and the expectations of those with whom we engage and work.

We continue to abide by regulations in all relevant operational areas, maintaining necessary permits and certifications. We also continually seek opportunities to go beyond these, through compliance with numerous industry guidelines and other voluntary measures, to ensure high labour standards and safe and responsible operations. In 2021, we continued to strengthen our compliance management system, further developing the reporting aspects of our Conflict-of-Interest Policy. We also updated both this and our Gift and Hospitality Policy. In addition, we introduced a new Global Sanctions Policy. All elements of our compliance management system, whether new or updated, are supplemented by internal communications and training programmes.

We are also developing a code of conduct specifically for third parties, which is being rolled out in 2022. Based on our existing Code of Business Conduct, it requires our suppliers, partners, and others with whom we engage to provide information on aspects like global sanctions, modern slavery and anti-money laundering as part of our initial engagement and due diligence processes.

ACCREDITATIONS

- *Various MSC Cruises group companies have earned multiple accreditations, these including:*
- *ISO 9001:2015 - Quality Management Systems – Requirements*
- *ISO 14001:2015 - Environmental Management Systems - Requirements*
- *ISO 45001:2018 - Occupational health and safety management systems - Requirements*
- *ISO 50001 – Energy Management*

CMA

The CMA CGM Group is built on strong human, entrepreneurial and family values: initiative, daring, integrity and imagination.

As a responsible company, we have drafted a code of ethics grouping all the rules and values to be adopted and applied by all employees. Similarly, we expect all «Business Partners», meaning all individuals who or organizations that transact with CMA CGM including but not limited to suppliers, intermediaries, resellers, channel partners, subcontractors, advisers, joint ventures, to comply with the CMA CGM Third Party Code of Conduct or equivalent rules of behavior.

This Code of Ethics defines our company's expectations for our collaborators' working relationships, specifically with other CMA CGM Group collaborators, customers, governments, public officials, business partners, suppliers, competitors, and the wider community.

The CMA CGM Group makes every effort to conduct its business in accordance with the values and principles contained in this Code of Ethics.

CMA CGM Code of Ethics can be found following the link:

<https://cmacgm-group.com/en/sustainability/our-sustainability-approach>

The health and safety of the Group's employees is a priority. Certain activities and business lines present significant risks, particularly on board, but also terminal and warehousing operations.

We have a Company QHSE policy. A dedicated Accident Prevention Committee is responsible for continuously improving safety performance, setting targets, review performance.

The objective of the CMA CGM Group's safety policy is to avoid any accidents that may result in injury or death, either to shore-based or seagoing employees, or major damage, either to vessels, goods or the environment, by establishing a set of procedures that are regularly evaluated and reviewed in an Integrated Management System (IMS).

As wholly owned subsidiaries of CMA CGM, CMA SHIPS and affiliated companies are dedicated to managing all fleet related operations via the IMS in respect of:

- *The International Safety Management code, CMAships holds valid Documents of Compliance issued by French Authorities and other countries related to respective vessel's flag.*
- *The International Ship and Port facility Security code*
- *Maritime Labor Convention*

Additionally, CMA ships is certified ISO 9001 Quality Management, ISO14001 Environment.

In its IMS CMA ships issued several different procedures related to any external company intervention on board.

Before attendance the external company will receive IMS card "Contractor on board guidance" containing information related to risk and safety with requirements for:

- *Preliminary common inspection*
- *Issuance of a Prevention Plan being a legal requirement containing a shared risk assessment, External company to ensure its employees are aware and apply the prevention plan.*
- *Administration related matters such as but no limited to Insurance, Passport, Visa and vaccination and health declarations.*

Before attendance and any works to be carried on board External Companies employees shall read, follow and fulfil several IMS related procedures and forms such as the:

- *IMS Card Prev-005A Contractors on board guidance*
- *IMS Card Prev-005B Prevention Plan*
- *IMS Card Prev-005C Cybersecurity Prevention Plan*
- *IMS Card Prev-005D LNG information*
- *Vessel familiarization and the dedicated familiarization for LNG powered vessels.*

External Company Employee shall participate to several meetings and exercises as required by vessel's officers and safety officers.

REV As part of our Sustainability Policy at REVOLVE, the main purpose of our health, safety and security program is to prevent work-related injuries or accidents. REVOLVE has contracted social security service providers to cover work-related accidents for all of its salaried staff. REVOLVE has a target of zero accidents at work as well as other health-related incidents such as burnout.

An integral part of our Sustainability Policy is our Health & Well-Being Programme that includes encouraging and providing support for staff to pursue sustainability-related activities that are positive for their mental and physical health and well-being. These after-work (or during-work) activities are covered by the Other Benefits of REVOLVE's salary packages.

REVOLVE's Code of Conduct is based on its core principles to:

- *Respect diversity and differences in all their shapes and sizes*
- *Always abide by laws and regulations in all circumstances*
- *Choose to be correct, direct and honest in your interactions*
- *Act with dignity, agility and purpose in representing REVOLVE*

These core principles are the backbone of REVOLVE: They provide the foundation upon which we developed our Values that give more detail and definition to our culture of sustainability. Our values are highlighted by the key words that define all REVOLVE operations: Transparency. Responsibility. Impartiality. Honesty. Professionalism.

REVOLVE is a signatory of the UN Global Compact and we adhere to and advance the UN Sustainable Development Goals (SDGs). We also have a zero-waste policy for all operations with our REPURPOSING program and a zero-emissions target for all travel and services provided for our people and projects with our REFOREST Program.

For more details, please visit: <https://revolve.media/sustainability/>