



# CODE OF CONDUCT

VIKTOR LENAC SHIPYARD believes in responsible social and ethical behavior. Furthermore, VIKTOR LENAC SHIPYARD and its employees have an obligation to all stakeholders to observe high standards of integrity and fair dealing. This is the foundation for and the reason why VIKTOR LENAC SHIPYARD has created the Code of Conduct.

The Code of Conduct applies to all our employees and all our business partners, both clients and suppliers.

## Implementation and monitoring

VIKTOR LENAC SHIPYARD monitors the implementation of the Code of Conduct. Violations will be handled immediately.

## Legal compliance

VIKTOR LENAC SHIPYARD is committed to performing with integrity and exceeding our clients' expectations. For this reason, we believe that it is important to comply with both the letter and the spirit of the laws and regulations that govern our business.

The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence. Situations may occur for which there are no specific guidelines. In such cases, conduct should be in the spirit of the Code of Conduct.

## Child labor and Forced labor

VIKTOR LENAC SHIPYARD recognizes the rights of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.

Furthermore, VIKTOR LENAC SHIPYARD does not employ nor accept any form of forced or bonded labor, prisoners or illegal workers whatsoever.

## Freedom of association and collective bargaining

VIKTOR LENAC SHIPYARD employees have the freedom to join or establish an association of free choice, to organize and to bargain collectively and individually. No employee should risk being harassed or retaliated against for exercising these rights.

## Workers' contracts, working hours and compensation

VIKTOR LENAC SHIPYARD complies with laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the applicable legislation and the market situation. Employees are entitled to a minimum of one day off in seven and to observe national holidays. Employees should be granted the stipulated annual leave, sick leave and maternity/paternity leave without any negative repercussions.

## Discrimination, harassment and equal opportunities

VIKTOR LENAC SHIPYARD provides a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development. Therefore VIKTOR LENAC SHIPYARD does not tolerate any form of discrimination or harassment in the workplace due to race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.

## Alcohol and/or drug abuse

VIKTOR LENAC SHIPYARD expects all employees to attend work with their judgment unimpaired and therefore to refrain from any alcohol and/or other drug abuse that may affect their work.

## Community outreach

VIKTOR LENAC SHIPYARD acts as a good corporate citizen and supports local, regional and global communities in appropriate ways.

## Environment and sustainability

- VIKTOR LENAC SHIPYARD will always meet legal requirements.
- VIKTOR LENAC SHIPYARD continuously seeks ways to reduce the consumption of resources, prevent pollution and improve the overall environmental impact of its operations and products along the value chain.
- VIKTOR LENAC SHIPYARD encourages the development and diffusion of environmentally friendly technologies.
- VIKTOR LENAC SHIPYARD requires all VIKTOR LENAC SHIPYARD production units with significant environmental impact to implement certifiable environmental management systems.

## Work environment

VIKTOR LENAC SHIPYARD is committed to providing a safe working environment and reducing risks that can cause accidents or impair the health and wellbeing of its employees.

## Building and fire safety

Hazardous material and equipment should be stored according to applicable rules and policy. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit.

## First aid and medical care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid.

A doctor or nurse should be contacted if necessary in the event of an accident on the premises.

## Business Ethics

VIKTOR LENAC SHIPYARD respects the laws and regulations related to business ethics of the country in which it operates and requires that suppliers and partners do the same.

## Competition and antitrust legislation

VIKTOR LENAC SHIPYARD is committed to vigorous but fair competition that is based on the added value of products and services. VIKTOR LENAC SHIPYARD does not engage in unfair, misleading or inaccurate comparisons, anti-competitive agreements or arrangements. Employees must avoid any kind of anti-competitive agreement or concerted practice with any of VIKTOR LENAC SHIPYARD's competitors or business partners.

In the event of an on-site investigation by a competition authority, employees should cooperate fully with the officials and must not obstruct the investigation in any way.

## Bribery

VIKTOR LENAC SHIPYARD does not accept bribes, facilitation payments or extortion in any form, be it as a giver / initiator or as a receiver.

## Entertainment, gifts, gratuities and donations

Purchasing and sales activities shall be handled with utmost integrity. Therefore neither VIKTOR LENAC SHIPYARD nor its employees should give or accept any gifts, gratuities or entertainment offers that could influence the employee's or the client's decision making. Small gifts, hospitalities and expenses are very common and natural in business relationships. With careful consideration and at a moderate value this could be acceptable, except whenever such arrangements could improperly affect the outcome of business transactions.

## Fraud

VIKTOR LENAC SHIPYARD does not accept fraud in any form.

## Records and reports

The integrity of VIKTOR LENAC SHIPYARD's record-keeping and reporting systems, including electronic reports and systems, is of utmost importance. Employees must take special care to make sure that records are accurately and completely prepared and reviewed, whether they are for internal or external use.

## Conflict of interest

Conflict of interest between the employee and the company must be avoided. Should such conflict occur, the employee must inform the immediate manager. Conflict of interests include:

- Outside business activities
- Personal financial interest
- Using insider or otherwise confidential information for personal gain
- Employment of family members or close personal friends
- Buying from or selling to family members or close personal friends.