

# What we value, how we behave



# Our Code of Conduct for Suppliers

What makes us who we are



Safety



Integrity



Sustainability



Performance



Collaboration



Innovation

# How we work together

Our Code of Conduct for Suppliers sets out the key principles of ethical and socially responsible conduct that you (as our supplier) agree must be upheld when working with us (Seaway7). It has been written in a way that we believe is most relevant to you and the interactions between our two organisations. It complements the full [Seaway7 Code of Conduct](http://www.seaway7.com) (available at [www.seaway7.com](http://www.seaway7.com)), where you can find more guidance, should you need it. You should also refer to our [Code of Conduct for Suppliers Implementation Guidelines](http://www.seaway7.com) (also available at [www.seaway7.com](http://www.seaway7.com)), where we have outlined how our suppliers can meet the minimum standards set out in this document by clarifying what we expect of you.

When an organisation asks you to comply with its Code of Conduct, it can seem like an imposition – we know, having been on the receiving end of such requests ourselves. You may well have your own Code of Conduct, which you and your employees are committed to upholding. Also, such requests don't take into account the fact that an organisation's behaviours are, ultimately, driven by its values and culture, not just by contractual undertakings – even though honouring such commitments is extremely important.

We trust you to uphold your contractual commitments with us, and we get assurance from your ability to demonstrate that you have your own Code of Conduct that sets out equivalent standards and which is embedded within your organisation.

Our Values of Safety, Integrity, Sustainability, Performance, Collaboration and Innovation underpin everything we do, including whom we choose to do business with and how our two organisations work together. We don't ask you to share our Values, just to respect them.

That being said, just as we won't compromise on safety when we work with you, we consider that integrity is a universal value, and we wish it to characterise the way in which our two organisations do business together. Moreover, sustainability encompasses all the key principles set out in the following pages, which are focus areas for Seaway7's sustainability strategy.

We require these standards of you, but you can also expect them of us, and we ask that you tell us if anyone is failing to uphold them.

Please ensure that all your staff, sub-contractors and agents who are involved in your supply of goods or services to Seaway7 operate to these standards too.

Thank you.

**Lloyd Duthie**  
Chief Executive Officer,  
Seaway7

**Pierre-Emmanuel Boulanger**  
SCM Director,  
Seaway7



## BUSINESS ETHICS

We are committed to doing business with integrity and to complying with all applicable laws in all jurisdictions in which we operate – including trade sanctions, export controls and laws against corruption and tax evasion.

We require our suppliers to do likewise.

### Bribery and Corruption

Seaway7 is committed to the prevention of corruption and will not tolerate bribery. Our policy is straightforward. We will not offer, request or accept bribes, nor will we use or permit others to do such things for us or when working for us. This includes offering any improper payment or benefit to any person, including any public official, to obtain new business, retain existing business, or secure any improper advantage.

We make no exception for so-called facilitation payments – typically small-value payments to public officials to secure or expedite the performance of a routine or necessary action to which the payer is already entitled.

We require the same of you.

### Gifts and Hospitality, and Conflicts of Interest

Reasonable gifts and hospitality that are neither intended nor likely to influence the recipient improperly can play a legitimate role in business relationships. But we do not allow gifts and hospitality or conflicts of interest to influence the work that our organisations do together.

We require the same of you.

### Competition and Anti-Trust

Our established policy is to compete fairly and ethically in full compliance with the competition and anti-trust laws in all jurisdictions in which Seaway7 operates.

We require you to do the same. This means, among other things, that you should:

- Respect our right to choose which suppliers we invite to pre-qualify or tender
- Be careful not to provide us with information about our competitors' bids or pricing.

## HUMAN RIGHTS AND LABOUR PRACTICES

We are committed to fulfilling our responsibility to respect and protect human rights. We strive to protect the dignity of all people working in or impacted by our operations, including people who work in our supply chain. This includes a commitment to help prevent slavery and trafficking, or other forms of forced or involuntary labour anywhere in our business or supply chain.

We are committed to fair and lawful employment practices across Seaway7 and throughout our supply chain. These include, as a minimum, complying with national legal requirements regarding wages and working hours in all jurisdictions where we operate. We are proud to be a signatory to the UN Global Compact, and we support the International Labour Organisation's standards regarding child labour and minimum age.

We require you to uphold the same standards when dealing with your employees, contract staff, sub-contractors and agents who are involved in your supply of goods or services to Seaway7.

## HEALTH, SAFETY AND SECURITY

Safety is one of our core Values. Seaway7 is committed to an incident-free workplace, providing a safe and secure environment to those involved in or affected by our activities.

Seaway7 requires an active commitment to health, safety and security from all our personnel and suppliers involved in or affected by our activities. We need everyone to look after each other, to stay alert and challenge, stop and report unsafe behaviour or equipment whenever you see it.

We require the same of you.

## THE ENVIRONMENT

We are committed to protecting the environment by complying with applicable environmental laws and regulations in all jurisdictions in which we operate, supporting a lower-carbon future economy and minimising the impact of our operations on the environment and the communities where we operate.

We seek to be more efficient in the way that we work and invest in solutions that mitigate or minimize adverse impacts on the environment.

We require the same of you.

## CYBERSECURITY AND DATA PROTECTION

We are committed to ensuring our information and communication systems are used properly and securely, comply with the relevant laws, standards and guidance, and that the personal data of our people, clients and supply chain are not at risk.

We respect everyone's right to privacy. Personal information is confidential and shall be collected, processed/used, disclosed, stored and disposed of in compliance with applicable privacy and data protection laws in all jurisdictions in which we operate.

We require the same of you.



## WHAT IF THERE IS A FAILURE TO UPHOLD THESE STANDARDS?

If you have a serious concern about behaviour that is inconsistent with this Code of Conduct for Suppliers, there are a number of options available to you:

- In general, first seek to address your concerns with the senior manager at Seaway7 responsible for your relationship.
- Alternatively, you can contact our SCM Director.
- If you do not feel comfortable raising your question or concern via any of these channels, you can contact our confidential reporting line (see details opposite).

We prohibit retaliation against anyone raising a concern in good faith or on the basis of a reasonable belief, and such concerns can be reported in a confidential and, where local laws permit, anonymous way.

**Note:** Throughout this document, “we”, “our” and “us” refers to Seaway7, and “you” and “your” refers to your organisation, as our supplier.

Our externally administered confidential reporting line is available 24 hours a day, 7 days a week via [www.safecall.co.uk](http://www.safecall.co.uk) or the telephone numbers below:

Angola	+44 191 516 7767
Australia	1 800 052 971
Brazil	0800 891 7813
Egypt	0800 000 0059
France	0800 00 99 20
Germany	00 800 72332255
Ghana	+44 191 516 7764
India	000 800 440 1256
KSA	800 8442067
Malaysia	1 800 220 054
Mexico	01800 123 1758
Netherlands	0800 020 1196
Nigeria	+44 191 516 7764
Norway	800 19821
Singapore	800 448 1542
UAE	8000 4413376
UK	0800 055 6712
USA	877 224 3830
Other	+44 207 696 5952

“ TOGETHER WE ALWAYS DO WHAT IS RIGHT ”



[www.seaway7.com](http://www.seaway7.com)



[communications@seaway7.com](mailto:communications@seaway7.com)



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