

# SUPPLIER CODE OF CONDUCT

## INTRODUCTION

At **GenPro**, we are committed to upholding the highest standards of integrity, professionalism, and sustainability in the maritime procurement industry. Our Code of Conduct establishes the principles and expectations we hold for our suppliers, contractors, and business partners. These standards reflect GenPro's unwavering commitment to ethical practices, mutual respect, and long-term value creation.

## OUR VALUES

GenPro operates according to the following guiding principles:



### RESPECT

We treat our colleagues, clients, and business partners with respect. We are committed to protecting the environment, acting socially responsibly, and giving back to our communities.



### ACCOUNTABILITY

We take ownership of our actions and their outcomes, striving to deliver comprehensive and verifiable results that benefit our clients and partners.



### TEAMWORK

Collaboration is at the heart of what we do. By supporting one another personally and professionally, we achieve greater success as a team.



### TRUST

Transparency and integrity are essential to building trust. We honour this commitment in all interactions, understanding its importance in sustaining strong relationships.



### PASSION

We take pride in understanding our clients' needs, delivering quality and innovation with determination and enthusiasm.

## PURPOSE

**GenPro** is committed to conducting business with integrity, transparency, and responsibility. This Code of Conduct outlines our expectations for all suppliers and service providers across our maritime supply chain. By adhering to this Code of Conduct, suppliers demonstrate their commitment to ethical standards, sustainable practices, regulatory compliance, and the well-being of people and the planet.



## TRANSPARENCY AND ETHICAL BUSINESS PRACTICES

### HONESTY AND INTEGRITY

Suppliers must uphold honest, ethical, and transparent practices in all business dealings with GenPro and its clients. Misrepresentation of products, services, or capabilities is strictly prohibited.

### CONFLICT OF INTEREST

Suppliers must actively avoid any situations or arrangements that could create actual, perceived, or potential conflicts of interest in their business dealings with GenPro, or their ability to act in the best interests of GenPro or its clients. Suppliers are required to immediately disclose any actual, potential, or perceived conflict of interest as soon as it is identified. Notification should be directed through the appropriate reporting channels.

### DOCUMENTATION AND RECORD-KEEPING

All transactions and agreements must be accurately documented and accessible for audits. Suppliers are required to maintain accurate records and adhere to GenPro's documentation requirements to ensure transparency in their operations.



## REGULATORY COMPLIANCE

### LEGAL AND REGULATORY ADHERENCE

Suppliers must comply with all applicable local, regional, and international laws and regulations, including but not limited to requirements set by Flag States and Class approvals relevant to their operations, services and products. Suppliers are expected to align with industry standards as outlined by the International Maritime Organization (IMO) and the International Labour Organization (ILO), adhering to environmental, safety, and quality standards from globally recognised bodies.

### GLOBAL HUMAN RIGHTS STANDARDS

Suppliers are required to uphold internationally recognised human rights frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGP), the Universal Declaration of Human Rights (UDHR), and the International Covenant on Economic, Social, and Cultural Rights (ICESCR), as well as ILO standards. Suppliers must ensure that their practices respect and protect the rights of all employees, contractors, and stakeholders involved in their operations.

### IMPACTS, RISKS AND OPPORTUNITIES (IRO) ASSESSMENT AND DUE DILIGENCE

Suppliers must regularly conduct due diligence and IRO assessments across their operations and supply chain to proactively identify, prevent, and mitigate potential environmental, social, and governance risks and impacts, while also identifying opportunities to enhance

performance and drive sustainable growth. This includes aligning with current European and international regulations requiring comprehensive due diligence and sustainability reporting processes, ensuring continuous commitment to ethical and sustainable practices.



## **COMMITMENT TO ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) STANDARDS**

### **ENVIRONMENTAL RESPONSIBILITY**

Suppliers must actively work to minimise environmental impact by reducing waste, conserving resources, and lowering emissions. This includes promoting responsible water management, protecting biodiversity, and implementing practices to reduce greenhouse gas (GHG) emissions in alignment with climate change mitigation goals. Suppliers should adopt energy-efficient measures, responsible waste disposal, and other eco-friendly practices aligned with international, regional, and local regulations, IMO environmental standards and GenPro's sustainability goals.

### **HUMAN RIGHTS AND LABOUR STANDARDS**

Suppliers are expected to uphold fair labour practices and respect the human rights of all employees, contractors, and subcontractors, including avoiding child labour, forced labour, discrimination, and harassment. Suppliers must ensure safe, healthy, and non-discriminatory working conditions, and be committed to fair wages and working hours in compliance with ILO standards. Additionally, suppliers should foster an environment of diversity and inclusion, promoting equal opportunities for all individuals regardless of gender, race, ethnicity, disability, sexual orientation, or religion.

### **GOVERNANCE**

Suppliers should maintain robust governance structures that promote accountability and transparency. This includes policies to prevent bribery, corruption, and anti-competitive practices, along with oversight mechanisms to ensure continuous compliance with GenPro's governance standards.



## **CYBERSECURITY AND DATA PRIVACY**

### **DATA PROTECTION**

Suppliers must protect all personal, client, and corporate data in compliance with relevant data protection laws, such as the General Data Protection Regulation (GDPR) where applicable. Suppliers are expected to implement industry-standard cybersecurity controls to prevent unauthorised access, data breaches, and cyber threats.

These measures should include, but are not limited to:

- Encryption of sensitive data in transit and at rest
- Multi-factor authentication (MFA) for accessing

systems handling confidential data

- Periodic security audits and vulnerability assessments
- Strict access controls ensuring only authorised personnel handle sensitive data

Suppliers must also ensure that third parties or subcontractors they engage adhere to the same level of security and compliance standards.

### **CONFIDENTIALITY**

Suppliers must respect and protect the confidentiality of any information exchanged with GenPro and its clients. All shared data, including but not limited to, financial, technical, and business information, must be handled securely, stored appropriately, and access must be restricted based on a need-to-know basis. Suppliers are strictly prohibited from disclosing or sharing proprietary or confidential information—including data, intellectual property, or documents—with third parties without prior written approval from GenPro. Appropriate safeguards must be in place to prevent unintentional disclosure, including non-disclosure agreements (NDAs) and robust internal policies.

### **INTELLECTUAL PROPERTY PROTECTION**

Suppliers must respect and protect all intellectual property rights associated with GenPro's products, services, and proprietary information.

Suppliers must not use, reproduce, distribute, or disclose GenPro's intellectual property without explicit permission.

This extends to:

- Software, designs, and technical documentation
- Trade secrets, patents, and proprietary methodologies
- Trademarks, branding, and any other GenPro-owned content

Suppliers are responsible for ensuring that their employees, subcontractors, and affiliates comply with these Intellectual Property Protection requirements and do not engage in unauthorised use or infringement.

### **CYBERSECURITY GOVERNANCE & INCIDENT RESPONSE**

Suppliers must have a robust cybersecurity governance framework that aligns with industry best practices, ensuring the security, resilience, and integrity of their IT systems and data.

This includes:

- Cybersecurity Policies & Risk Management: Suppliers should have formalised cybersecurity policies that define risk assessment procedures, security controls, and compliance measures
- Employee Awareness & Training: Regular training

programmes should be in place to educate employees on cyber threats, phishing risks, and data handling best practices.

- System Hardening & Threat Monitoring: Continuous monitoring for vulnerabilities, malware, and unauthorised access must be conducted to mitigate threats proactively.

#### **INCIDENT RESPONSE & BREACH NOTIFICATION**

Suppliers are required to have clearly defined incident response plans to identify, contain, and remediate cybersecurity incidents and data breaches without delay.

This includes:

- Immediate notification to GenPro upon detection of a breach or potential security risk
- Taking corrective action to contain and mitigate the impact of an incident
- Conducting a post-incident review to analyse root causes and implement preventive measures to avoid recurrence

GenPro reserves the right to request evidence of compliance, security audit reports, or additional assurances to verify adherence to these cybersecurity and data privacy obligations.



#### **QUALITY, HEALTH AND SAFETY OF OPERATIONS, PRODUCTS, AND SERVICES**

#### **PRODUCT QUALITY AND COMPLIANCE**

All products and services provided must meet relevant quality, safety, and environmental standards, including applicable Flag State and Class approval requirements. Suppliers are expected to adhere to product specifications and requirements outlined in agreements with GenPro, and clients.

#### **OCCUPATIONAL HEALTH AND SAFETY (OHS)**

Suppliers must prioritise the health, safety, and well-being of their employees by maintaining a safe working environment and complying with all relevant occupational health and safety laws and regulations. This includes ensuring that employees are properly trained, equipped, and provided with appropriate protective measures to mitigate workplace hazards. Suppliers should have clear OHS policies in place, conduct regular safety audits, and take immediate corrective actions when necessary to address any safety concerns.



#### **RESPONSIBLE SOURCING**

Suppliers are expected to practice responsible sourcing by procuring goods and materials in ways that consider their environmental, social, and ethical impacts. This includes selecting suppliers and subcontractors that

align with GenPro's commitment to sustainability, fair labour practices, and legal compliance. Suppliers must ensure that sourced materials are obtained through ethical channels that respect human rights, local communities, and environmental sustainability, minimising negative impacts throughout the supply chain.



#### **SUPPLIER PERFORMANCE MONITORING**

#### **REGULAR AUDITS**

Suppliers agree to undergo regular audits and assessments conducted by GenPro or authorised third parties to verify compliance with this Code of Conduct. These audits may cover areas such as sustainability practices, health and safety measures, operations, products, and services quality, data privacy, cybersecurity, and compliance with applicable legal and regulatory requirements. Suppliers must maintain all relevant records for at least 2 years to demonstrate compliance with the terms of this Code of Conduct and applicable laws and regulations, and these records must be made accessible for review during audits.

In addition to audits, GenPro reserves the right to assess supplier performance based on Key Performance Indicators (KPIs) according to each supplier scope of business.



#### **SUSTAINABILITY AND THE UN SUSTAINABLE DEVELOPMENT GOALS (SDGS)**

Suppliers should actively support the UN Sustainable Development Goals by working toward sustainable development practices. This includes environmental stewardship, promoting fair labour practices, and supporting community development initiatives. Suppliers are encouraged to adopt circular economy principles, such as resource efficiency, waste minimisation, and sustainable sourcing.

#### **ZERO-TOLERANCE POLICY ON CORRUPTION AND BRIBERY**

Recognising the critical role of collective action in addressing systemic issues in the maritime industry, GenPro supports the principles and initiatives of the Maritime Anti-Corruption Network (MACN). As part of our dedication to promoting a corruption-free maritime environment, we require our suppliers to adhere to the highest ethical standards, actively combat corruption, and ensure compliance with applicable laws and regulations.

Suppliers are prohibited from providing or receiving gifts or hospitality that could be perceived as influencing business decisions or creating a conflict of interest.

While occasional, modest gifts of low value may be acceptable, any gift exceeding \$25 is prohibited, to ensure that gifts do not impact or appear to influence business relationships or decisions.

#### **SANCTIONS CHECKS**

Suppliers must conduct thorough sanctions checks to ensure compliance with all applicable laws and regulations concerning trade restrictions and sanctions. This includes verifying that they are not engaging in business with individuals or organisations subject to international sanctions imposed by relevant authorities.

#### **CONTINUOUS COLLABOURATION AND IMPROVEMENT**

GenPro seeks to establish long-term partnerships with suppliers who are committed to ethical and sustainable practices. Suppliers are encouraged to continuously improve their standards and align with GenPro's values.

#### **SUPPLY CHAIN ACCOUNTABILITY**

Suppliers must implement and enforce this Code of Conduct throughout their own supply chains. This includes ensuring that their sub-suppliers, contractors, and third-party partners also comply with the principles outlined in this Code of Conduct. Suppliers are responsible for monitoring their supply chains for any potential breaches and taking corrective actions to ensure compliance, thereby maintaining the integrity

of their operations and upholding GenPro's ethical standards.

If a supplier identifies a breach or potential breach of this Code of Conduct within their supply chain, they are required to immediately inform GenPro. Prompt notification of any issues or violations is crucial for maintaining transparency and addressing any risks or concerns swiftly. Suppliers must cooperate fully with GenPro in investigating and resolving any reported breaches.

#### **REPORTING CHANNELS**

GenPro encourages open communication and accountability. If you encounter any violation of this Code of Conduct or have concerns regarding unethical practices, we urge you to report them through the following confidential channel:

Email: **[ethics@genpro.com](mailto:ethics@genpro.com)**

We assure you that all reports will be treated confidentially and thoroughly investigated, with protection against retaliation for those who raise concerns in good faith.

Suppliers must also ensure that their employees and stakeholders are free from retaliation when reporting concerns.