



## **CODE OF CONDUCT**

### **Compliance with Laws**

GLF complies with all applicable laws and regulations of the countries in which operations are managed or services provided.

### **Human Rights**

GLF treats people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organisation (ILO) conventions.

GLF ensures that illegal child labour is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed, provided the legal age is consistent with the minimum working ages defined by the International Labour Organisation (ILO).

GLF must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which operates.

### **Employment Practices**

GLF ensures that their employees are afforded an employment environment that is free from physical, psychological and verbal harassment, or other abusive conduct.

GLF provides equal employment opportunity to employees and applicants for employment without discrimination.

GLF ensures that pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

GLF respects the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. GLF also recognises and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

### **Anti-Corruption**

GLF complies with the anti-corruption laws, directives and regulations that govern operations in the countries in which it does business.

GLF refrains from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety.

GLF exerts reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.



GLF does not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

GLF does not fix prices or rig bids with their competitors and does not exchange current, recent, or future pricing information with them.

### **Conflict of Interest**

GLF avoids all conflicts of interest or situations giving the appearance of a potential conflict of interest and provides notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of GLF Group and personal interests or those of close relatives, friends or associates.

### **Maintain Accurate Records**

GLF creates accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction fully and accurately represent the transaction or event being documented. Records are retained based on the applicable retention requirements.

### **Information Protection**

GLF properly handles sensitive information, including confidential, proprietary, and personal information. Information is not used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorisation from the owner of the information.

GLF complies with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

GLF protects the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. GLF complies with applicable data privacy laws.

### **Environment, Health, and Safety**

GLF established an appropriate management system for Environment, Health and Safety. GLF operates in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which they operate.

GLF protects the health, safety, and the welfare of their employees, contractors, visitors and others who may be affected by their activities and complies with all applicable environmental, health and workplace safety laws and regulations.

### **Global Trade Compliance**

GLF ensures that its business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components and technical data.

GLF ensures that their business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, and technical data. GLF provides truthful and accurate information and obtain export licences and/or consents where necessary.