

## **Purpose**

The purpose of this Code of Ethics is to define the ethical principles and standards that guide the conduct of Kent Offshore Ltd, its employees, subcontractors, and representatives. It ensures that all business activities are carried out with integrity, professionalism, and respect for people, the law, and the environment.

## **Integrity & Honesty**

We conduct our business honestly and transparently.

- We do not tolerate fraud, deception, or dishonesty in any form.
- We honour our contractual commitments and communicate truthfully with clients, suppliers, and team members.
- We report all actual or suspected ethical breaches promptly through appropriate channels.

## **Legal Compliance**

We comply with all applicable laws, regulations, and industry standards in every jurisdiction in which we operate.

- This includes health & safety, anti-corruption, environmental protection, data protection, trade controls, and employment laws.
- We actively monitor legal obligations and adjust practices accordingly.

## **Quality & Professionalism**

We uphold the highest standards of quality and professionalism in all our work.

- We deliver services in line with contractual obligations, technical specifications, and recognised best practices.
- We strive for zero-defect performance and continuous improvement.

## **Health, Safety & Environment (HSE)**

We are committed to safeguarding the health and safety of our people, clients, and communities.

- We maintain safe working environments and comply with all HSE regulations and site-specific requirements.
- We respect and protect the environment by minimising waste, emissions, and resource consumption wherever practical.

## **Respect & Fairness**

We treat all individuals with dignity, respect, and fairness.

- We do not tolerate harassment, bullying, discrimination, or any form of abusive behaviour.
- We value diversity and promote equal opportunities regardless of race, gender, age, disability, religion, or background.

**Anti-Bribery & Corruption**

We operate a strict zero-tolerance policy on bribery and corruption.

- We do not offer, give, solicit, or accept bribes or improper inducements – directly or through third parties.
- We keep accurate records of all transactions and hospitality, in accordance with our financial controls and anti-bribery policies.

**Confidentiality & Data Protection**

We respect the confidentiality of all information entrusted to us.

- We protect sensitive data, trade secrets, and proprietary information of our clients, suppliers, and employees.
- We comply with data protection laws (e.g., UK GDPR) and maintain secure handling of personal and commercial information.

**Conflict of Interest**

We avoid situations where personal interests conflict – or appear to conflict – with our professional duties.

- Employees must disclose any actual or potential conflicts of interest to management promptly.
- We make decisions in the best interest of the company, free from bias or personal gain.

**Ethical Supply Chain**

We expect suppliers, subcontractors, and business partners to share our ethical standards.

- We assess and engage partners based on integrity, quality, HSE performance, and ethical compliance.
- We will not knowingly work with entities engaged in illegal, exploitative, or unethical practices.

**Reporting & Accountability**

All personnel have a responsibility to uphold this Code of Ethics.

- Suspected violations can be reported confidentially to line managers or through the company's reporting procedure.
- No retaliation will be tolerated against those who report concerns in good faith.
- Breaches of this Code may result in disciplinary action, including termination of employment or contracts.

**Policy Review**

This Code is reviewed annually and communicated to all personnel, contractors, and partners as part of our onboarding and compliance processes.

**Approved By**

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