

	<b>DIAPLOUS MARITIME SERVICES</b>	<b>Procedure IMP-01</b>
	INTEGRATED MANAGEMENT SYSTEM MANUAL COMPANY ORGANOGRAM & POLICIES	<b>Issue Date Nov 2020</b>

## APPENDIX F - CODE OF CONDUCT

### **Introduction Letter:**

Welcome to Diaplous Code of Conduct. Before commencing any kind of affiliation with Diaplous you must first read and familiarize with the content of this document. The code of conduct is the depiction of our ethical behaviour and the culture that accompanies each of our actions. Everything mentioned in this document is based on all constitutional guidelines that govern our services. Diaplous is the vessel and all individuals affiliated with the company are its sailors. The vessel's destination is success and its course is always heading upturn. In order for the vessel to function properly and reach its destination all sailors must communicate in the same language, follow the same rules, have the same vision and promote a common culture. Whoever joins the vessel is considered as part of the crew, but in return he/she must comply and promote the same culture. The company works like an ecosystem where everything is surviving by benefiting its environment and ejecting all parasitic behaviours. By reading, understanding, following and promoting Diaplous Code of Conduct, we are welcoming to our crew and we are ready to begin our upturn course with all compasses pointing to the future of Risk Management.

### 1. GENERAL

A personal commitment to ethics and compliance is something over Diaplous have absolute control. Anything less than 100% compliance undermines our performance and risks high costs that would hurt our bottom line as well as our hard-earned reputation plus putting into risk our customer's reputation. By following this Code of Conduct (from now on referred to as 'Code' or 'CoC') you are helping to make Diaplous credible, competitive and affordable.

#### **Who Is Our Code Of Conduct For?**

The Code applies to every employee (either located at Diaplous offices or assigned onboard), director and officer in Diaplous Company. Contract staff working for Diaplous must also follow the Code. Subcontractors and consultants who are agents of, or working on behalf of, or in the name of Diaplous, are required to act consistently with the Code and comply with it.

#### **Why Do We Need The Code Of Conduct?**

To describe the behavior expected of our employees, the mentality and culture that they should develop and maintain through relating to Diaplous Business Principles and core values. When a problem arises and the solution is not obvious, the code of conduct can be used as guidance to overcome the issue while providing the best results.

#### **What Happens If Code Is Violated?**

Violations of the Code, and the relevant policies as indicated, can result in disciplinary action, up to and including dismissal. The violation of the code is divided into two different categories: The violation of legal regulations (either local or international) & of company values and policies. Before proceeding to retaliation, the type of violation must be clear. In case the company's values are breached, the result can lead up to dismissal. When legal laws are involved, Diaplous may

report the violation to the relevant authorities, which could also lead to legal action, fines or imprisonment.

### **How Diaplous Ensure That Code Is Being Respected And Followed?**

Diaplous has established a well-structured Management system (Diaplous Integrated Management System) that constantly monitors and ensures that the conduct is respected. Furthermore, the code is constantly evaluated and updated when needed. Before a new cooperation with an individual or entity commences, it is made sure by Diaplous that the code is well communicated and understood by the other party.

The code is included in every training and presentation to make sure that is both familiarized to all parties and regularly reminded.

For example, the Training Managers of Diaplous ensure that Diaplous employees are trained through below training, where teaching & evaluation of Code of Conduct is done:

- 1.** Induction Course/ Refresher Team Member Course
- 2.** Team Leader Course/ Refresher Team Leader Course
- 3.** Senior Team Leader Course
- 4.** Health, Safety, Environmental Briefings
- 5.** Medical Courses

Diaplous operates, besides others, in the context of ICoC, voluntary principles on security and human rights, as well as based upon the basic principles on the use of force and firearms by law enforcement officials.

In particular, regarding the Code of Conduct, Diaplous:

- operates according to applicable laws and regulations and in accordance with relevant corporate standards of business conduct;
- operates by recognizing and supporting the rule of law, respects human rights and protects the interests of the client.

### **Implementing the Code**

All Company's employees, office personnel, PCASP and subcontractors should read, understand and act according to Company's Code of Conduct and report any inappropriate behavior & concerns they may have about corrupt activities either within the company or in dealings with third parties, to their line managers.

In order to achieve sustainable business:

- 1.** We do not participate in money laundry.

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2. We do not proceed to criminal actions.
3. We do not transact with criminals.
4. We do not offer financial sponsorships to political parties.
5. We comply with all legislations and laws concerning the operations of our company.
6. We handle with high sensitivity and responsibility all issues related to Health, Safety, Security and Environment.
7. We insure to high profile organizations all Company's assets.
8. We don't discount, we add value.
9. We protect the reputation of both our company and our clients'
10. We maintain high levels of customer retention and satisfaction
11. Our strategies, targets and Integrated Management System are dynamic: they are being constantly analyzed and revisited

Reputations are hard won and easily lost. We can all play a part in protecting and building Diaploous reputation. How can this be achieved?

1. **Competition** should be fair and open. You cannot put a price on free trade. We support free enterprise and we seek to compete fairly and ethically within the framework of all applicable competition laws. Our international activities must also support fair competition despite the different cultures and laws and as a result all stakeholders working for or with Diaploous, are familiar with the legislation of the countries they operate at.
2. **Business Integrity** is of huge importance. Every person affiliated with Diaploous must comply and promote an ethical behavior that is in line with the company's Code of Conduct. Every action must reflect 4 essential elements: Trust, Consistency, Collectivity and Evolution. Direct or indirect payments, soliciting or acceptance of bribes or facilitation payments in any form is unacceptable. We also seek to ensure that our agents and suppliers do not make any facilitation payments on our behalf. This applies to transactions with a foreign or domestic government official or employee or with any private company or person, and whether in the conduct of domestic or international business. Also, it applies whether the payment is made or received directly or through a third party, such as an agent or supplier.
3. **Public Trust** is loaned not given. To keep it, our actions and our assets must be open to scrutiny and above suspicion. Under this frame all business transactions on behalf of Diaploous must be transparent and reflected accurately and fairly in the company accounts. True records should be maintained. The values of the company must be upheld under all areas of operation and during all times. All interactions must be mutually beneficial and build healthy relationships.
4. **Equal Opportunity** should be given to everyone by creating a friendly working environment where every employee can develop his/her skills and talents.
5. **Information** can be an asset and an advantage. It should be guarded closely and used wisely. Information is not advantageous on its own, but when interpreted and used correctly, it can give the company substantial benefits. By filtering information through the company's policies, beliefs and human resources, new strategies are born that become

qualitative advantages. In a world where the significance of information is getting bigger in the business area, the implementation of information security protocols is a one-way road.

Diaplous contributes to building a harmonious workplace based on team spirit, mutual respect and understanding and refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or favoritism in the workplace of the Organization's Code of Conduct. On the contrary it is promoted and supported the building of a positive, respectful and motivating environment.

- Every staff member and non-staff member has a right to work in a harassment-free and respectful environment.

Diaplous is committed to address inappropriate behavior, including harassment, by or towards its employees.

- Employees responsible for conduct which can be construed as harassment, sexual harassment or abuse of authority may be subject to appropriate administrative or disciplinary measures.
- All employees affiliated with Diaplous, must promote a discrimination free environment, where all cultures and beliefs are respected.

Measures to deal with inappropriate behavior (including harassment, threatening behavior, sexual abuse, coercion, etc.) will be based on the principles of fairness, impartiality, sensitivity and respect.

- Everyone who works for Diaplous has a responsibility to sustain a respectful work environment by upholding the highest standards of conduct and applying necessary confidentiality measures.
- All Religion beliefs are respected. Any Religion beliefs must not be imposed to others.
- Diaplous will ensure that adequate resources are available to promote a positive work environment and to prevent inappropriate behavior in the workplace.
- Staff members have the right to choose an informal or formal dispute resolution process.
- Diaplous will provide appropriate mechanisms to prevent or deal with retaliation related to the reporting of allegations of harassment.

## **2. COMMITMENTS**

Diaplous ensures that its personnel comply with the principles included in the Diaplous Code of Conduct, Code of Ethics & Business Principles, ICoC, BMP5, BMP West Africa, The Montreux Document, IMO Circulars, BIMCO Special Circular (20/02/2014), Guardcon. It is implemented, by establishing the right selection criteria, by teaching them during the training period and by

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committing them, by signing the appropriate text in the private contract with company. The company always accept a due diligence check or audit whenever a client requires so.

The goods and services provided by Diaplous will not be used to violate human rights law or international humanitarian law and this is ensured by the appropriate end user licenses of the weapons, as well as by keeping records of the movement and the location of the weapons.

Diaplous is committed to act in a manner consistent with the laws of the countries within which its representatives are present, to be mindful of the highest applicable international standards and to promote the observance of applicable international law enforcement principles and therefore possesses all the necessary permissions for arms transfer/storage to many coastal states.

Diaplous not only supports and respects human rights, but also assists any way possible towards the elimination of human rights abuse. Actions like child labor, forced labor and human trafficking are strictly prohibited within our organization and any incident or suspicion is immediately reported.

The company's Management System (IMS) contains policies and procedures that monitors and confirms that commitments are upheld by all parties and in case of breach all necessary follow up actions are made in order to remedy, update the IMS and prevent future non conformities from happening.

### **3. DATA PROTECTION**

Diaplous respects the personal data of employees. We collect only what data is necessary in order to conduct our business and we store it securely and for no longer than is necessary. Data protection is not only limited on our personnel, but governs all data we receive from our clients, subcontractors, or other sources.

We comply with applicable data protection rules and laws wherever we operate, as proposed by GDPR standards, which Diaplous complies fully with. As a company with a global footprint, we have established procedures and policies in order to guarantee data safety. An internal DPO is also responsible for the following:

1. Ensures that the organization processes the personal data of its staff, customers, providers or any other individuals (also referred to as data subjects) in compliance with the applicable data protection rules.
2. Ensure that controllers and data subjects are informed about their data protection rights, obligations and responsibilities and raise awareness about them;
3. Give advice and recommendations to the institution about the interpretation or application of the data protection rules;
4. Ensure data protection compliance within the institution and help the latter to be accountable in this respect.
5. Handle queries or complaints on request by the institution, the controller, other person(s), or on his own initiative;

6. Draw the institution's attention to any failure to comply with the applicable data protection rules.

We also understand the vital connection between information, data and success. By protecting information and data, we maintain the trust of all stakeholders and we have established policies and procedures to help protect our information resources and information systems from unauthorized access or leakage, falsification, loss, destruction or other security risks. Effective security is a team effort requiring the participation and support of every employee and affiliate who uses our information resources and/or systems.

#### **4. RISK ASSESSMENT**

Diaplous is a Risk Management company and risk mitigation techniques are implemented in all of the company's activities. As a Risk Reducer, the company has become a part of the solution and not part of the problem.

Every time Diaplous deals with a customer, business partner, joint venture, Government Official, competitor, or any other stakeholder, we need first to understand the risks as well as the opportunities. We also need to ensure that Diaplous interactions comply with all relevant international laws and trade legislation.

Prior to any project, new cooperation, or joint venture, Diaplous conducts its own risk assessment in order to identify any potential threats involved, sets its safety barriers in order to minimize potential risks and prevents any top events from happening. Remedy actions are always discussed and ready in order to minimize any damage caused in the unlikely scenario of a top event. Due diligence procedure to Diaplous business partner is followed either remotely through completing a due diligence questionnaire audit form or physically by Diaplous onsite audit to partner's headquarters evaluating a range of criteria set below, such as, but not limited:

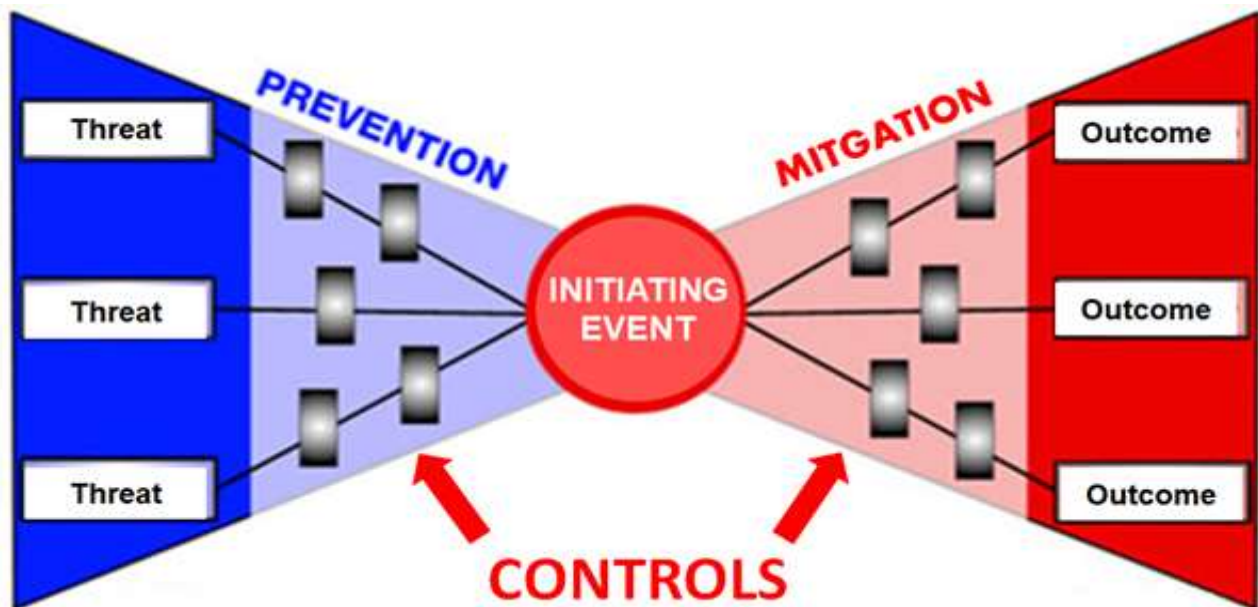
1. General
2. Legal Requirements
3. Accreditations
4. Procedures
5. Financial Status
6. Training
7. Policies
8. Experience & Knowledge
9. Compliance with International Laws and Regulatory Environment
10. Insurance

All the above are described in the Company's Risk Management procedure. Diaplous has created Risk Assessment Matrixes for all areas of operation which are constantly updated and are kept up

to date, in order to include latest incidents, new hazards, lessons learnt and remedy actions. As a general procedure, the steps for creating a risk assessment are as per below:

1. Threat identification
2. Threat assessment based on Likelihood and Severity
3. Threat categorization to Low/Medium/High
4. Apply barriers and preventive measures to mitigate the chances of a top event
5. In case of top event apply remedy actions to ensure minimum damage and the best possible outcome
6. Study the root causes of the top event
7. Use lessons learnt to update the company’s Risk Assessment Matrix

An example of how a danger is treated can be seen in the below Bowtie Analysis.



As another example, during the operations Diaploous considers the following risk criteria that may impact on interested parties:

1. The overall risk policy of the organization and the client and their risk tolerance.
2. The inherent uncertainty of operating at sea in an area with high risk of piracy.
3. The nature of the likely threats and consequences of an incident on its operations, reputation and business.
4. The impact of an incident.
5. The impact of the combination of a number of risks are taken into consideration:
  - a. The residual risk of being pirated.

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- b. The life saving capabilities of the ship and the ship's safety certificate.
- c. Facilities for the safe storage of firearms onboard the ship.
- d. The potential for, and measures to mitigate, the misuse of firearms resulting in bodily injury or death.
- e. The potential for, and measures to mitigate, unforeseen accidents.
- f. The potential for, and measures to mitigate, armed guards escalating a piracy incident.
- g. Liability issues.
- h. Measures to ensure compliance with international and national laws.

In order to keep business interactions legal, ethical, transparent and professional, each third party involved with Diaplous should protect itself from any suspicion or wrongdoing safeguarding Diaplous reputation. In order to achieve that, Diaplous has Policies, Code of Ethics, and Code of Conduct & Business Principles in place, which can be used as guidance from all concerned parties so as to comply with the requested guidelines, increasing mutual performance and minimizing any potential risk.

## **5. DEPLOYMENT AND CONDUCT**

Diaplous ensures that the employed PCASP will behave humanely and with respect for dignity and privacy, regarding the treatment of any person. Strict orders have been given to all PCASP, in particular to Team Leaders.

Behavior:

All PCASP, office personnel and subcontractors represent Diaplous on a Global level. Their moral behavior follows Diaplous' Code of Conduct and promotes the company's culture. Each individual treats other people humanely, with respect to human rights.

Use of force:

1. A general rule is the avoidance of use of force. In case the use of force is inevitable, then the use of force should be proportionate to the threat and appropriate to the situation. Our extensive experience from "Atalanta" operation regarding the use of force is that pirates, after warning shots, stop attacking and they retreat. Direct use of force without previous use of all the other means (flares, verbal warnings, warning shots, raising up/showing the arms, firing against the outboard engine), will cause revenge fire or later likely retaliation. Diaplous' belief is that after an engagement, we should allow the pirates to leave "proud", that means use all the other means for the job, without offending the attackers. If this fails, use as last resort the self-defense right.
2. The use of force will be in the context of self-defense right, or defense of others against the imminent threat of death or serious injury. Since Diaplous' PCASP are ex-navy or army special forces, they have been trained for years on how to apply the self-defense right, in particular during sensitive tension periods of their country.
3. No use of weapons that cause unwarranted injury or present an unwarranted risk.



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4. The arms will be used only in the appropriate circumstances and in a manner likely to decrease the risk of unnecessary harm.
5. When force is used, assistance and medical treatment has to be provided to injured persons, including the offenders.
6. Equipment exports and imports comply with all applicable laws and regulations of the country concerned.
7. Diaploous monitors the use of equipment and, in case needed, investigates possible situations in which such equipment is used in an inappropriate manner.
8. Before the use of force, the development of non-lethal incapacitating weapons (rocket flares), should be used in appropriate situations, with a view to increasingly restraining the application of means capable of causing death or injury of persons.
9. Clear intent of using weapons is used in advance (for instance: showing/raising up the weapons, verbal warnings that armed guards are onboard).

## **6. BASIC PRINCIPLES ON THE USE OF FORCE AND FIREARMS**

1. Weapons which are used by company, are fully authorized and with the necessary user licenses. Company uses semi-automatic, for an accurate-and layered/graduated level of defense at a distance. The mentioned weapons are used only for the protection against piracy.
2. All transactions of weapons take place after the necessary possession of arms transfer and storage licenses with the interesting regional countries.
3. All weapons are controlled/monitored by serial numbers from embarkation place to disembarkation place.
4. Records regarding to whom and when the weapons used are kept.
5. Personnel, who will carry weapons, are authorized and trained to use such a type.
6. They are also trained in the issues referred in paragraphs 56-57-58-59 of ICoC and in the UN principles as well as in the "Basic Principles on the Use of Force and Firearms by Law Enforcement Officials" (1990) and national laws or regulations, in effect, the area "duties will be performed".
7. Company uses (as also stated in company's RUF) non-lethal incapacitating weapons (flares Comet or Pain Wessex), with a view to increasingly restraining the application of means capable of causing death.
8. Company ensures the assistance and medical aid to any injured or affected pirate at the earliest possible moment.
9. According to company's RUF, PCASP clearly let the intruders to know that:
  - a. they have perceived their presence;
  - b. they are armed;
  - c. they intent to use force.




**7. VOLUNTARY PRINCIPLES**

Diaplous does not limit its actions based on our legal obligations, but also promote its moral behaviour and beliefs. All actions and decisions of the company are made in a way that respect Human Rights, benefit the society and are against any negative environmental impact.

As part of the company’s social responsibility, Diaplous participates in charities such as donating medical equipment to hospitals. Company also ensures that where force is used, medical treatment should be provided to injured persons, including the offenders, as also stated in the relevant principle of ICoC. For that purpose, one of the team members (usually the team Leader) is certified medic.

Environmental sensibility is also a part of Diaplous culture. Environmental metrics are in place to ensure that water and electricity consumption are in the lowest level necessary, recycle bins are placed within the company’s premises and environmental related protocols are in place and communicated to all members of Diaplous. The company also understands the need for the reduction of Carbon dioxide (CO2) emissions in the shipping industry and supports the global community.

Date: <b>Nov 2020</b>	Position: <b>Director</b>	Name: <b>K. Papaioannou</b>	Signature: 
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