

## **APPENDIX F - CODE OF CONDUCT**

### **Introduction Letter:**

Welcome to Diaploous Land Service Land Service Code of Conduct. Before commencing any kind of affiliation with our Company 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. Diaploous Land Service 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 Diaploous Land Service Code of Conduct, we are welcoming you 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 Diaploous Land Service Land Service ethics compliance and policies is something that the Company requires from every part of the ecosystem. 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 Diaploous Land Service credible, competitive and affordable.

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

The Code applies to every employee (either located at Diaploous Land Service offices or assigned on project), director and officer in Diaploous Land Service Land Company. Contract staff working for Diaploous Land Service Land must also follow the Code. Subcontractors and consultants who are agents of, or working on behalf of, or in the name of Diaploous Land Service Land, 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 Diaploous Land Service 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 Land Service may report the violation to the relevant authorities, which could also lead to legal action, fines or imprisonment.

### **How Diaplous Land Service Ensure That Code Is Being Respected and Followed?**

Diaplous Land Service has established a well-structured Management system (Diaplous Land Service 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 Land Service 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 Land Service ensure that Diaplous Land Service 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 Land Service 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, security personnel 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.
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 Land Service 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 Land Service 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 Land Service 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.

**2. COMMITMENTS**

- 1. Respect to Universal Human Rights.** In Diaplous Land respect to Human Rights is nonnegotiable, every stakeholder should treat all persons humanely and with respect for their dignity and privacy and report any noncompliance immediately.
- 2. Rules for Use of Force.** In Diaplous Land Service all security personnel will adopt Rules for the Use of Force consistent with applicable law
- 3. Use of Force.** All security personnel is required to try and de escalate a situation. If force is used, it shall be in a manner consistent with applicable law. In no case shall the use of force exceed what is strictly necessary and should be proportionate to the threat and appropriate to the situation.
- 4. Apprehending Persons.** Security personnel cannot take or hold any persons except when apprehending persons to defend themselves or others against an imminent threat of violence, or following an attack or crime committed by such persons against Company Personnel, or against clients or property under their protection, pending the handover of such detained persons to the Competent Authority at the earliest opportunity. Any such apprehension must be consistent with applicable national or international law and be reported to the Company Management Team and to the Client without delay.
- 5. Discrimination.** In **Diaplous Land Service** we treat all people as equals. We do not discriminate, and we do not accept any kind of discrimination to our employees and partners. Thus, the Personnel shall not discriminate on grounds of race, color, sex, religion, social origin, social status, indigenous status, disability, or sexual orientation and it is **mandatory** to report such behaviors to the Management Team or via the whistle blowing line.
- 6. Prohibition of Child Labor.** In Diaplous Land Service we respect the rights of children (anyone under the age of 18). So, it is forbidden by any contractor or associate to have children in its workforce. Special concerns arise in worst form of child labor were practices similar to slavery or trafficking may occur. In this case any employee or associate is mandatory to report to the relevant authorities **immediately**.
- 7. Human Trafficking.** In **Diaplous Land** we are actively responding in case even concerns arise for human trafficking. In this case our employees and associates are mandated to report immediately to the relevant authorities. **An additional policy has been created for this topic (appendix P)**
- 8. Force Labor.** In **Diaplous Land** under no circumstance we do not tolerate Force Labor by our associate or in the communities where we operate. If such an event is recognized all our employees and associates are mandated to report immediately to the relevant authorities.

**9. Sexual Exploitation and Abuse or Gender-Based Violence.** In **Diaploous Land** we do not tolerate sexual harassment, or any other form of sexual abuse or violence. It is mandatory for all Personnel to, remain vigilant for all instances of sexual or gender-based violence and, where discovered, report such instances to competent authorities

**Diaploous Land Service will provide appropriate mechanisms to prevent or deal with retaliation related to the reporting of allegations of harassment.**

*(check whistle blowing policy appendix I)*

By following the above 9 principles Diaploous Land Service 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.

Diaploous Land Service ensures that its personnel comply with the principles included in the Diaploous Land Service Code of Conduct, Code of Ethics & Business Principles, ICoC. It is implemented, by establishing the right selection criteria, by teaching them during the training period and by 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 Diaploous Land Service 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.

Diaploous Land Service is committed to act in a manner consistent with the laws, 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.

Diaploous Land Service 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 nonconformities from happening.

### **3. DATA PROTECTION**

Diaplous Land Service 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 Land Service 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 ASSESMENT**

Diaplous Land Service 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 Land Service 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 Land Service interactions comply with all relevant international laws and trade legislation.

Prior to any project, new cooperation, or joint venture, Diaplous Land Service conducts its own risk assessment in order to identify any potential threats involved, sets its safety barriers in order to

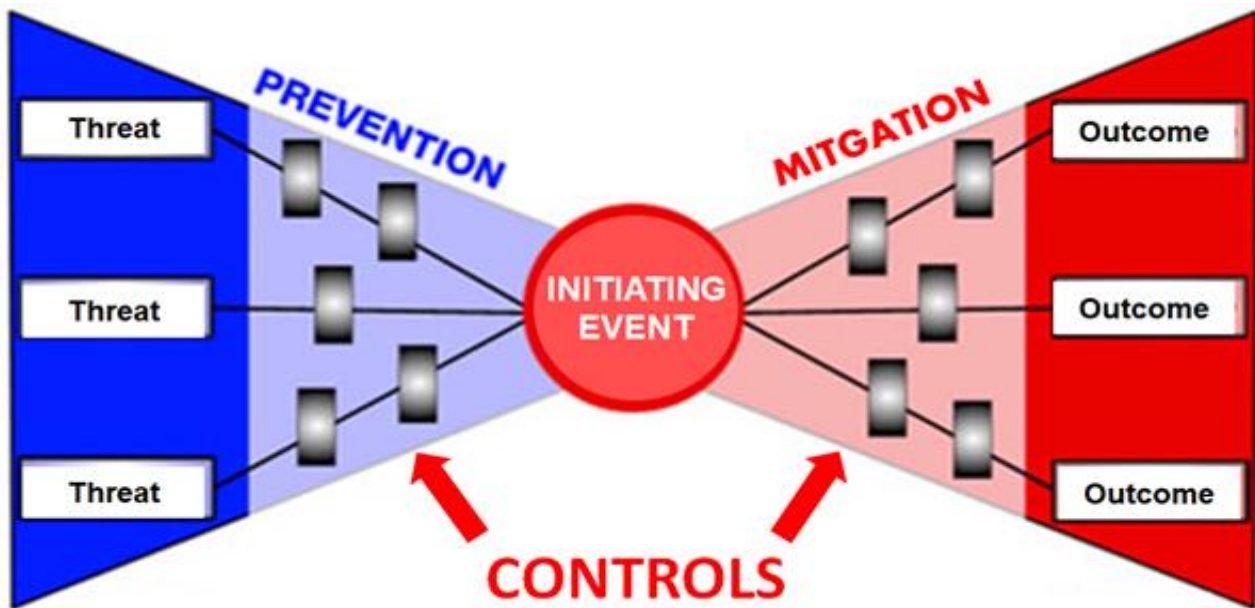
minimize potential risks and prevents any top events from happening. Remedy actions are always discussed and ready in order to minimize any damage caused in the unlikely scenario of a top event. Due diligence procedure to Diaplous Land Service business partner is followed either remotely through completing a due diligence questionnaire audit form or physically by Diaplous Land Service 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 Land Service 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 Land Service 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 nature of the likely threats and consequences of an incident on its operations, reputation and business.
3. The impact of an incident.
4. The impact of the combination of a number of risks are taken into consideration:
  - a. The residual risk of being attacked.
  - b. The potential for, and measures to mitigate, unforeseen accidents.
  - c. The potential for, and measures to mitigate, security personnel escalating an illegal activity.
  - d. Liability issues.
  - e. Measures to ensure compliance with national and international laws.

In order to keep business interactions legal, ethical, transparent and professional, each third party involved with Diaploous Land Service should protect itself from any suspicion or wrongdoing safeguarding Diaploous Land Service reputation. In order to achieve that, Diaploous Land Service 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 Land Service ensures that the employed security personnel will behave humanely and with respect for dignity and privacy, regarding the treatment of any person. Strict orders have been given to all security personnel, in particular to Team Leaders.

**Behavior:**

All security personnel, office personnel and subcontractors represent Diaplous Land Service on a Global level. Their moral behavior follows Diaplous' Code of Conduct and promotes the company's culture. Each individual treat 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.
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.
3. When force is used, assistance and medical treatment has to be provided to injured persons, including the offenders.
4. Diaplous Land Service monitors the use of equipment and, in case needed, investigates possible situations in which such equipment is used in an inappropriate manner.

**6. VOLUNTARY PRINCIPLES**

Diaplous Land Service 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 Land Service 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.

Environmental sensibility is also a part of Diaplous Land Service 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>March 2021</b>	Position: <b>General manager</b>	Name: <b>A.Galatis</b>	Signature:
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