



## DIAPLOUS LAND SERVICES

Procedure  
IMP-01

INTEGRATED MANAGEMENT SYSTEM MANUAL  
COMPANY ORGANOGRAM & POLICIES

Effective Date  
March 2021

### APPENDIX K - CODE OF ETHICS

#### Scope

The Code of Ethics is a guide of principles designed to help professionals conduct business honestly and with integrity. This Code amalgamates our principles and values, which should steer the actions and decisions of Diaplous Company. Substantially, the Code of Ethics incorporates both our high standards and best practices and its main aim always lies to advising us suitably. At the same time, our Code of Ethics safeguards our commitment to diligence through excellence and our integrity as far as the ethical conduct is concerned. Therefore, the abiding compliance of our employees of our Code of Ethics is unquestionable for Diaplous.

The code applies to all directors, officers and employees of the Company. Our goal is to be the market leader in the Maritime Risk Management industry, while never compromising our commitment to our core values and our reputation. Compliance with the Code helps to sustain and enhance the good reputation of the Company and contributes to long term value creation for clients. We believe that every employee plays their part in building and strengthening the Group as a whole. We operate a non-retaliation policy: any employee who in good faith reports any act of apparent misconduct or unethical behavior will not be victimized or treated adversely. Each of us has the right to speak up if we see something unethical or unsafe, as stated in Whistleblowing Policy.

Company, its employees and agents, are required, as a minimum standard, to comply with all the International regulations and law, and flag administrative requirements.

#### a. Employee Responsibility

Company expects its employees to act with integrity at all times to safeguard the trust in which Diaplous is held by its customers, shareholders, suppliers and other individuals and organizations with which our businesses interact. This helps to protect the investment of shareholders.

Top Management, managers and supervisors are responsible for ensuring that the Code is understood and followed by all employees. Compliance with all the aspects of the code must be taken into account when reviewing the performance of all personnel.

No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with the company, or which might compromise their ability to meet the responsibilities of their job.

Company does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage (please refer to Antibribery Policy).



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Employees who have access to privileged information (including proprietary and confidential information, whether belonging to company or others) must not use it to achieve personal gain for themselves or others.

Employees must ensure proper and responsible use of all Company's assets, including physical property, intangible assets, IT equipment and communication resources.

### **b. Dealings with Subcontractors, Agents, Suppliers and Customers**

Company provides its customers with services, which meet or exceed their requirements, through the application of quality management systems and continuous improvement programs. These are designed to develop and apply innovative ideas, to respond quickly to changing customer demands and to improve continuously service quality and value.

Employees must respect and treat in accordance with agreed terms the technology, intellectual property, confidential information and any other assets or data received from customers and others.

Company shall engage business with suppliers that have exhibited standards of ethics and business integrity and have demonstrated compliance with all applicable laws and regulations. All suppliers or contractors that do business with or on behalf of the Company must undergo a thorough review before any business is undertaken. Subsequently, the Company must exercise continuous oversight of the operations and practices of the subcontractors and suppliers that we select. On the first stage of our communication with our partners, Diaploous main goal is to familiarize them with our Code of Ethics prior signing the contract agreement. All Diaploous Ethics are also disclosed thoroughly on the contact and therefore must be endorsed by all our suppliers, contractors, and other business partners before initiating business with them. It is imperative by our side to assure that all our partners are always maintaining in compliance with our ethics at all stages of our cooperation.

### **c. Human Rights**

Company upholds all internationally recognized human rights wherever its operations are located and adheres to all relevant international guidelines designed to ensure that weapons or other equipment are not used for the purposes of terrorism or abuse of human rights. In addition, company has "zero tolerance" for any case of human rights' violence.

We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labor, human trafficking, forced labor, religion, and race. Directors and any employee or third party acting on behalf of the Company who directly or indirectly engages in human trafficking will be immediately terminated (please refer to Human Trafficking Policy).



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Company records all business transactions accurately, prudently, and transparently, in compliance with the accounting policies and in accordance with best practice.

Comprehensive assessment and management of risk, together with strong systems of internal control, are essential aspects of company's structure and serve to ensure that it is managed effectively and that reported results are accurate.

An independent Internal Audit function monitors and reports to the company's managers on the effectiveness of internal controls and on the ongoing risk management process for identifying, evaluating and managing significant business risk.

Date: <b>March 2021</b>	Position: <b>General manager</b>	Name: <b>A.Galatis</b>	Signature:
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