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1.0. Who Must Follow Our Code

We at Gibdock believe that our high standards of values regarding health & safety, quality of works and environmental awareness should be upheld by all. As a result, Gibdock expects all of its employees to know and follow our Code of Conduct. We expect all Gibdock sub-contractors and suppliers who may be temporarily assigned to perform works or services for Gibdock to follow our Code of Conduct in connection with their work for us.

2.0. Maintaining the Highest of Standards

2.1. Occupational Health and Safety

Gibdock places the upmost importance on the health, safety and wellbeing of its workforce above all and is committed to maintaining the highest of standards in line with ISO 45001:2018. As a company, Gibdock complies with all applicable legislation and aims to continuously and systematically review and improve health and safety performance. We instil an ethos to the whole workforce that everyone is responsible for their health and safety at work, and every employee has a voice in communicating concerns or possible improvements. Management is responsible for cascading and implementing our health and safety procedures. All third parties entering the yard must comply with our health and safety procedures at all times and without exception.

2.2. Quality of Works and Services

Quality of works is what distinguishes a business as market leaders, Gibdock is recognised as consistently delivering a high quality product on time and without compromising on health and safety. This is achieved through the established work ethic of hard work and commitment from its loyal workforce, together with efficient collaboration from our trusted suppliers and sub-contractors. This is reflected in the ISO 9001:2015 standard which we hold and continually strive to maintain and improve.

2.3. Environmental Responsibility

Gibdock recognise the importance of minimising our environmental impact and protecting our natural environment, and endeavour to keep trying to reduce our carbon footprint, improve waste management by increasing recycling practices and continue to research and invest in innovative ways to reduce our impact onto the surrounding areas. As such, we maintain the latest ISO 14001:2015 standard as testament of our commitment, and ensure compliance with all applicable laws and regulation relating to the environmental protection including reporting and inspections by the relevant authorities. Gibdock also verifies that our sub-contractors and suppliers operate within the Green Passport Standards regarding the IMO Guidelines on Ship Recycling.

3.0. Respecting People

3.1. Ethical Practices

Gibdock is committed to upholding ethical business practices and be recognised for being so domestically and internationally. We aim to instil good judgement throughout our workforce to maintain our high standard of integrity throughout the workings of the company.

3.2. Respect, Dignity and Fair Treatment

Gibdock recognises our responsibility in ensuring human rights are respected, upheld and advanced across our business and associated supply chain. Gibdock is steadfast in ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity, with no discrimination or victimisation.

3.3. Responsible Procurement and Business Partnering

Gibdock relies on a multitude of suppliers for equipment, materials and services sourced both locally and internationally. We aim to give equal opportunities to solicit the most competitive offers taking into consideration quality, price, delivery, service, and terms and conditions associated with each procurement. Gibdock is dedicated to ensuring that quality is never compromised on items regarding health and safety, placing the safety of its workforce as a priority above all. We also ensure our sub-contractors and suppliers are in compliance with the Ethical Trading Initiative Base Code which is founded on the conventions of the International Labour Organisation which is an internationally recognised code of labour practice.

4.0. Countering Corruption and Legal Abidance

4.1. Legal Framework

Gibdock will follow and adhere to Gibraltar Laws based on UK and EU Legislation. We take our legal compliance responsibility very seriously and so monitor legislation via the Gibdock Legal Register (GD-REG-0031). As such, we expect all our employees to comply with applicable legal requirements and prohibitions.

4.2. Accurate Records, Reporting and Accounting

The financial reports that Gibdock maintains internally, and the financial information it provides to shareholders, regulators and other stakeholders must be accurate and complete.

We prepare our financial statements in accordance to the applicable laws in Gibraltar and Gibraltar Financial Reporting Standards and are independently audited in accordance with international standards of auditing on an annual basis. Our records provide valuable

information for the business and evidence our actions, decisions and obligations. Procedures and processes are in place to ensure that underlying transactions are properly authorised and accurately recorded.

4.3. Anti-Bribery

Gibdock is committed to conducting its business with the highest standards of integrity and so prohibits any form of bribery to or from third parties as detailed within our Anti-Bribery and Corruption Policy (GD-POL-0014).

4.4. Hospitality and Gifts

Gibdock does not prohibit normal and appropriate giving or receipt of gifts to or from third parties, provided that this is done in an appropriate manner and within the boundaries of the law, and as detailed within our Anti-Bribery and Corruption Policy (GD-POL-0014).

4.5. Government, Regulators and Non-Government Officials

Any contact by Gibdock employees or representatives of the company with government, legislators, regulators or non-government officials must be done so with honesty, integrity, openness and in compliance with local and international laws.

4.6. Politics

Gibdock as a company does not engage in politics and does not make any donations or contributions to any political party or candidates. Employees can only offer support or contributions to political groups in a personal capacity and with no association to the company.

5.0. Safeguarding Information

5.1. Data Protection

All employees must adhere to the Gibdock Data Protection Policy (GD-POL-0017) in accordance with the Data Protection Act 2004-1 (DPA) and the European Union's General Data Protection Regulations 2016 / 679 (GDPR), as enforced and regulated by the Gibraltar Regulatory Authority. Gibdock will ensure that Data Protection legislation is observed regarding both physical and electronic data.



5.2. Collection and Retention of Information

Gibdock respects the privacy of all its stakeholders regarding their personal data. Therefore, we endeavour to only collect data necessary for conducting business, in accordance with the applicable laws and with respect for privacy as a human right.

We are legally obliged to retain certain data for appropriate periods of time for legal, accounting or auditing purposes after which, it will be confidentially destroyed if found unnecessary to keep. Physical data will be kept in a secure location with restricted access only to authorised personnel as deemed necessary by Senior Management and managed by the respective head of department. Electronic data is stored within the company servers; storage of all company electronic information follow the company IT policies, in specific, Gibdock Back-Up Policy (GD-POL-0010).

5.3. Use of Information Technology

Gibdock employees should use IT equipment and personal devices to access information and conduct their daily tasks in a responsible and secure manner, and in compliance with Gibdock Computer Usage Policy (GD-POL-0006) and Gibdock IT Employee Acceptable Use Policy (GD-POL-0013).