



Ethical Code of Conduct

Scott Campbell, Managing Director, Independent Marine Limited.

Our Purpose

This document shall serve as guidance for the moral and ethical standards expected from you as an employee or sub-contractor of Independent Marine Ltd.

This Code is for every employee, contractor, officer, and director of Independent Marine Ltd. It is short, clear, and easy to read because simplicity is one of our core values. We work hard to serve our fellow seafarers because they work hard for us. We believe that the lonely, the weak, and the isolated at sea deserve a commitment from us to make things better for them. We can do this by listening to their pain, remembering their stories, and celebrating their work.

Knowledge is power, and language is leadership. By our honesty, care and attention we aim to help our clients serve their workforce, improve their performance, and enhance their resilience while providing maritime services.

Our Values

The priority for decision making never changes in anything we do, at sea or on land.

Our Priorities:

1. Safety of human life.
2. Protection of property.
3. Care for the environment.

Our Goals:

1. Service.
2. Simplicity.
3. Completeness.

We exist to serve our clients, our colleagues and the wider world with kindness, integrity, and excellence. No deadline, no cost, and no contract should ever come before the life and soul of a human being. When in doubt, stop and reassess.

Our Policy Standards

Order

We obey the laws of Scotland and the United Kingdom. We obey the laws of flag states, coastal states, and all international maritime rules (e.g. UNCLOS, IMO, MARPOL, SOLAS) that apply where we operate. Where laws differ or conflict, we follow the safest practicable standard. Where conflict arises between a rule and a universal moral standard, we do what is right.





Honesty

We do not tolerate bribery or corruption. We never give or take bribes, facilitation payments, secret commissions, or improper gifts. Even if it is customary, it is never normal for us. If employees must pay illegally solicited fees to preserve the safety of life, or property, then they may do so only to that minimum extent. We seek full legal redress when it is safe to do so.

Protection of Health, Safety and Environment

We stop any job that we identify as putting the safety of life at unnecessary risk. We prevent pollution of the sea, air, and land. We aim to protect the health of the body, soul, and conscience of everyone we work with, in any way we can. We respect your right to rest and know it is part of readiness. We will honour your time off and privacy.

Service with Safety

When we work for clients on a client's vessel, rig, offshore asset, office, or onshore site, we follow that client's own safety, environmental and operating rules as far as practicable. Where multiple clients have conflicting policies in effect on the same site or asset, we aim to comply with the strictest safety standards as far as practicable. We avoid unnecessary tank entry.

We aim to serve our client's best interests over the longest applicable period. We aim to complete what we start, fully. If we make mistakes, we start over again, until it is right.

Respect, and Human Rights

We believe that all people have equal value. We treat every person with the dignity and respect they deserve. We do not knowingly discriminate unfairly based on any immutable characteristic. We aim to judge people based entirely upon their actions and their word.

We do not engage with any client who uses forced labour, child labour, slavery, trafficking, modern slavery, or indentured servitude in their business. We always report violations to the client, the relevant authorities, and international humanitarian agencies when it is safe to do so.

We always take complaints of bullying, harassment of any kind, and perceived unfair treatment seriously. We will respond with discretion and responsibility.

Integrity, Conflict and Money Laundering

We always aim for full disclosure of potential conflicts with clients before engaging in projects with them. If something in your private life could affect your work, tell a director at once. Where your family, friends, financial situation, or anything else may present a conflict of interest, we promise to address any conflict fairly, early, and with discretion.

Never accept gifts or hospitality that may look like a bribe. No money laundering.

Serious or repeated breaking of this Code of Conduct can lead to dismissal or ending of contract. This includes contracts with our clients. We will not coerce any employee or subcontractor to endure unsafe conditions for the sake of the commercial interests of this company.





Ownership

We look after property and information as carefully as if it were our own. We always aim to leave a work site cleaner than we found it and to return equipment in good condition. Company or client tools, money, vessels, data, and information belong to their owners. We guard them carefully and never use them for personal gain.

Consent and Copyright

Employees of Independent Marine Ltd. must adhere to any copyright agreement the company has with its clients. Copyright is a natural right. However, employees and contractors will agree to pass copyright ownership of work completed on behalf of the company, to Independent Marine Ltd., even where their name appears on published works, unless otherwise agreed. Work completed on company time or using company resources belongs to the company. Although personal projects and growth are encouraged by Independent Marine Ltd. Please disclose any perceived potential conflicts of copyright to a director at the earliest opportunity.

Do not copy or share software, drawings, manuals, photos, or documents without clear permission. Store all physical and digital materials securely.

Discretion and Data

We follow every client rule about photographs, videos, and social media posts. We abide by agreements made with clients regarding social media comments while on their assets, including Data Protection Rules (GDPR). We never reveal engineering details, trade secrets or confidential information that belongs to any client. Personal photographs for use on social media should not show details of the arrangements of any maritime operation, copyrighted material, or engineered asset. We keep personal data safe and private under UK GDPR rules.

Compliance with Trade Sanctions

We comply with all UK and international trade sanctions and export-control laws. We will never knowingly trade with, supply, or pay any person, company or country that is on a sanction list. If you are not sure, ask a director at once.

At the same time, when we meet or deal with people who come from a sanctioned country or company (for example, in a port, on a ship, or at a conference), we will always treat them with the same courtesy, respect and human dignity we show to everyone.

Testimony

We keep true and clear records. We speak the truth gently and plainly, even when it is hard.

Courage and Confession

Responsible leaders give a voice to the voiceless. If you witness something that isn't right, speak up. If you see or hear something wrong, tell any one of the company directors immediately. We trust our employees to lead by example, and to use their own discretion.

You may report any concern anonymously, to any director, if you wish.

Never punish anyone for raising a concern in good faith. Examine every report fairly and quickly. Aim to be dispassionate, neutral, and even-handed where you can.





Our Promise

We are Independent Marine. If you are collaborating with us, or for us, it is because we see you as an Independent Mariner too.

Independence does not mean going it alone. It means being free to follow your conscience, in the name of serving our highest shared values. We hope you understand that, and that you always feel free to do and say the right thing.

Independence is a promise.

To be independent, is to refuse to be forced or bought. It is to strive. To never settle in our pursuit of our highest standards and ideals.

This means that we promise to think critically. It means, we will speak freely, act with care, self-control, and attention. It also means we promise not to bow to threats, bribes, intimidation, groupthink, political scapegoating, unethical temptations, or passing fashions.

We choose to do what is right because it is right. Not because someone stronger tells us to.

This company is privately owned and will not be controlled or intimidated by any hidden group, government or big firm that asks us to betray our values, our clients' interests, or the integrity of our profession. We ask that during your time with us, you hold us to these standards and help us in striving to achieve them.

We work with whoever treats us fairly and lawfully, and we walk away from anyone who asks us to lie, cheat or compromise our people.

That is our promise.

Signed on behalf of the company

Scott Campbell, Managing Director, Independent Marine Ltd.

Date: 27 November 2025.

Company number: SC725270.

Registered office: No.1 Michaelson Square, Livingston, EH54 7DP, West Lothian, Scotland, UK.

