



## OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

### COMPANY'S POLICIES AND MANAGEMENT COMMITMENT CODE OF ETHICS AND CODE OF CONDUCT

#### **Code of Ethics and Code of Conduct**

The Code of Ethics and the Code of Conduct are based on **the Company's** beliefs and values, establishing its commitment to honesty and integrity.

The primary function of these Codes is to make the fundamental values and principles, guiding the activities of the Company, known within the organization and its managed ships and to all agents, contractors, suppliers, and other cooperating third parties.

These Codes aim to ensure that robust and precise values and highest standards of behavior unite the Company and orient individual conduct to confirm the image of correctness, prestige, and good reputation, which have always been **the Company's** assets.

**ALPHA GAS S.A.** does not tolerate bribery, fraud and corruption, and any allegations of such conduct or behavior by any person performing duties on behalf of the Company will be treated with the utmost seriousness. Further, failure to adhere to this Code of Conduct will result in our disciplinary procedure being applied and may lead to dismissal.

**ALPHA GAS S.A.** expects from all personnel a behavior according to the established principles, laws, rules, and standards. Employees must:

- NEVER be involved in harassment, abuse, discrimination, or child pornography.
- NEVER conceal any identified unsafe act or event which affects or could affect health, safety, the environment, and property.
- Impartially perform their duties and act in honesty and good faith.
- Treat all information regarding operations, projects, or any other work carried out as confidential to the extent that such information does not conflict with Company Policies and is not already disseminated or made generally available to third parties.
- Read, understand, and comply with the information contained in this Code and with any training or other anti-bribery and anti-corruption information they are given.
- Avoid any activity that is contrary to the spirit and letter of this Code and that could lead to, or imply, a breach of this Code.

#### **ALPHA GAS S.A.:**

- Strongly prohibits any offer, gift or bribe in any form direct or indirect, including kickbacks in all operations as well as the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from agents, contractors, suppliers, or employees of any such party or government officials.
- Where it is inappropriate to decline an offer or a gift (i.e., when meeting with a person of a specific religion and/or culture who may be offended if an offer or a gift is rejected) and the intention behind the offer or the gift is not uncertain, the gift may be accepted so long as it is declared to the Managing Director who will assess the circumstances.
- Strongly prohibits any promise, or makes an improper payment to, or otherwise confers any illicit benefit upon, a Public Official in any country, directly or indirectly, to obtain, retain, or direct business to anyone.
- Conducts procurements fairly and transparently.
- Is committed to acting professionally, fairly and with integrity in all business transactions and relationships, wherever in the country it operates.
- Has zero tolerance for bribery and corrupt activities.



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- Ensures compliance with institutional and regulatory framework regarding measures for the avoidance of bribery.
- Creates actions and procedures that reflect the “zero tolerance” stance of the Company towards any corruption practices.
- Refrains from offer, promise, authorize, or make, directly or indirectly, a political or charitable contribution on behalf of the Company without obtaining prior written authorization from the Managing Director.
- Commits to the prevention, detection and proper investigation of fraud, including deception, dishonesty, fraudulent financial reporting, misappropriation of assets, theft, bribery or corruption and/or concealing a conflict of interest.

#### **Gifts, Corporate Hospitality and Travel Expenses:**

**ALPHA GAS S.A.** considers the following areas as potentially vulnerable to allegations of bribery:

- Dealings with other service providers and suppliers to the Company;
- Facilitation payments;
- Gifts, Corporate Hospitality and Travel Expenses;
- Political and Charitable Donations;
- Dealings with foreign public officials; and
- Introductions and referrals.
- Persons performing duties on behalf of the Company must not accept or offer gifts, meals, entertainment or other benefits that go beyond normal business courtesies Company prohibits business expenses if:
  - ◆ Create a feeling of obligation
  - ◆ Compromise a person performing duties on behalf of the company's professional judgment
- Influence the judgment of the recipient or effect the recipient to do or not do something in favour of the company or a person performing duties on behalf of the company.

#### **Facilitation payments: The Company:**

- Prohibits the payments facilitation via unlawful payments, possibly requested by Public Officials to speed up a routine government action or any form of tax evasion.
- Urge personnel to resist if a Facilitation Payment is demanded.
- Report the incident to the Managing Director.
- Prepare e a written record of the incident, including prevailing circumstances clear description, payment made (if any) and the individual(s) involved. If appropriate, issue a Letter of Protest.

#### **Payments Record-Keeping:**

- All persons performing duties on behalf of the Company must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.
- Company's Finance Department must keep financial records in a central confidential register and have appropriate internal controls in place that will evidence the business reason for making payments to third parties. This register is presented to Managing Director every January in order to identify any potential trends and take actions to reduce them, as and if needed.

All accounts, invoices, and other records relating to dealings with third parties, including suppliers and customers, should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Persons performing duties on behalf of the Company must not accept or offer gifts, meals, entertainment or other benefits that go beyond normal business courtesies.



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*The Company prohibits business expenses if:*

- *Create a feeling of obligation.*
- *Influence the judgment of the recipient or effect the recipient to do or not do something in favour of the Company or a person performing duties on behalf of the Company.*

#### **Conflict of interest:**

- *Persons performing duties on behalf of the Company must avoid situations where personal interests could conflict with the Company's interests.*
- *Any potential conflicts of interest should be reported promptly so that they can be managed appropriately.*

#### **Anti-Money Laundering and Combating Terrorist Financing:**

- *Occurs when a person becomes involved in an arrangement which he or she knows or suspects assists in the acquisition, retention, use or control of criminal property by another person.*
- *Persons performing duties on behalf of the Company are to conduct appropriate counterparty due diligence so as to verify the lawfulness of the business and background of business partners and the origin and destination of money and property for transactions in which the Company is involved.*
- *Persons performing duties on behalf of the Company are to declare any suspicions in relation to money laundering. Those to whom such concerns have been reported shall, where necessary, take advice from the Managing Director.*

#### **ALPHA GAS S.A.:**

- *Has a very strict sanctions policy in line with the latest requirements of OFAC, OFSI, AMSA, DFAT, EU, Paris PSC MoU, etc. and complies with all applicable laws, regulations and industry recommendations in relation to anti-money laundering and combating terrorist financing.*
- *Regularly reviews information of existing and potential business partners and customers and ensures that sanctioned entities and individuals listed in the OFAC (USA), UN and EU sanctions lists, as updated from time to time, are identified and no business is conducted with them.*

#### **Prohibition of forced labor, child labor and human trafficking:**

#### **ALPHA GAS S.A.:**

- *Is committed to a work environment that is free from human trafficking, forced labor and unlawful child labor.*
- *Will not tolerate or condone such activities in any part of its organization. Company employees, contractors, subcontractors, vendors, suppliers and others through whom the Company conducts business must avoid any action that constitutes trafficking in persons, forced or child labor and must comply with all applicable laws, regulations and recommendations in relation to the above.*
- *Ensures that its employees are of legal working age for their position and complies with ILO and MLC standards, as well as with the applicable State laws for youth employment or student work, such as internships or apprenticeships.*
- *Takes measures to verify, evaluate, promote awareness about, and address risks associated with forced labor, child labor and human trafficking in its direct business dealings.*

*Examples of actions undertaken include the following:*

- o *Evaluating and addressing business risk in the area of forced labor and human trafficking*
- o *Supplier verification of compliance with applicable anti-slavery and human trafficking*



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- o *Awareness of Company employees.*

*Please make sure that you read the contents of the Code of Conduct carefully and ensure that you understand what is expected of you in relation to anti-corruption issues. If any questions arise, please contact the Managing Director.*

*The Company's shore staff and seagoing personnel shall not be involved in any kind of harassment, abuse, discrimination or child pornography.*

*All persons performing duties on behalf of the Company provided with a copy of this Code of Conduct are expected to comply with its terms.*

*NOTE: This Code is not intended to create any employment relationship or contractual rights in favour of any person performing duties on behalf of the Company or the Company. The Company reserves the right to change the terms of this Code at any time.*

*Date: 18/02/2025*

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