



**MacArtney Group**

# **Code of Conduct**

**Corporate**

Code of conduct - Corporate

Introduction

This code of conduct comprises MacArtney Group guidelines for issues relating to corporate responsibility and determines best practices for employees, managers, and the organisation. The code of conduct also outlines what is expected from suppliers and partners to MacArtney Group within the field of ESG (environment, social and governance).

The code of conduct should be used as a tool:

- When communicating with stakeholders such as customers, partners, authorities, etc.
- When introducing new employees to the MacArtney Group
- During assessments and evaluations of ESG activities

Regular review and updates ensure the code of conduct remains relevant and effective.

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United Nations  
Global Compact

## Code of conduct - Corporate

### Statement from CEO

MacArtney Group is committed to maintaining a culture of integrity, respect, and ethical behaviour in line with the UN Global Compact and Sustainable Development Goals.

As a global market leader, we have a responsibility to continuously improve how we work and act. We have a strong set of values based on our history as a family company, and this has been our DNA since our foundation in 1978.

This Code of Conduct outlines our expectations for all customers, employees, suppliers, and partners to uphold these principles in all interactions and activities associated with our organisation. All employees and managers at MacArtney have a shared responsibility for our company's success and reputation through our attitude and behaviour.

The 10 principles in our Corporate Code of Conduct mark the direction in which we want to develop our business in cooperation with our employees, customers, suppliers and stakeholders.

### About MacArtney

The MacArtney Group is a global supplier of underwater technology products and systems, with a specialisation in designing, manufacturing, selling, and servicing a wide range of systems for oil & gas offshore operators, ROV, diving, and survey contractors, the renewable energy sector, ocean science institutes, and navies worldwide.

MacArtney offers an extensive variety of advanced and reliable products and system solutions spanning from subsea cables and connectors to state-of-the-art integrated packages, including fibre optic telemetry, underwater cameras and lights, oceanographic instruments, marine winch systems, and remotely operated towed vehicles (ROTVs). All supplied products are designed and tested to provide high quality, efficiency, and reliable performance in the challenging underwater environment.



MacArtney is a privately owned corporation established in 1978 with group headquarters in Esbjerg (DK). The MacArtney Group also reside in Aberdeen (UK), Stavanger (NO), Mölnlycke (SE), Aix-en-Provence (FR), Bologna (IT), Rotterdam (NL), Kiel (DE), Bremen (DE), Houston, Boston and San Diego (US), Victoria (CA), Dartmouth (CA), Rio de Janeiro (BR), Mumbai (IN/UAE), Perth (AU), Ningbo (CN) and Singapore (SG). Moreover, MacArtney operates an extensive network of 20 representatives and distributors spread across every continent.

## 1. Ethical behaviour

At MacArtney Group, we act with honesty, integrity, and transparency in all aspects of our work, including tax matters, social inclusion, business ethics and data management.

As a responsible international company with global offices and a network of partnerships, MacArtney Group has a strong focus on ensuring its values through ethical business practices and maintaining operations that are both credible and transparent.

### Our core values include:

- Trustworthiness
- Customer focus
- Result orientation
- Caring

## 2. Environmental policy

MacArtney Group is committed to minimising our negative environmental footprint throughout our organisation. We minimise air and noise pollution and follow local environmental laws. All chemicals undergo an environmental risk review before approval for use in our production.

We sort waste into recyclable fractions, aiming to maximise recycling opportunities. Additionally, we are committed to minimising our overall electricity, water, and heating consumption throughout our organisation. We actively work towards lowering our greenhouse emissions by implementing carbon accounting methods and setting reduction targets across our business.

## 3. Anti-corruption and bribery

We compete fairly and ethically in the marketplace, and we aim to eliminate all forms of corruption. This means that employees at MacArtney Group never offer, give, request, or accept a bribe.

We adhere to antitrust laws and avoid engaging in anti-competitive practices to uphold high business integrity.

Corruption is the abuse of an entrusted power for private gain. Bribery is to offer, provide, authorise, request, accept or receive a financial or other advantage to encourage improper performance or to misuse a person's position. A bribe can be anything of value and does not necessarily involve money.

Any violations of the anti-corruption policy must be reported immediately to the immediate manager or other person designated by the company. MacArtney Group encourages all to report violations anonymously through our whistleblower system.

## 4. Modern Slavery

Macartney Group has a zero-tolerance policy towards modern slavery and human trafficking. We are committed to ensuring that no forms of forced labor or exploitation occur in our operations or supply chain. All employees and managers must be aware of and report any suspicions of modern slavery.

## 5. Purchasing and suppliers

MacArtney Group encourages all suppliers to adhere to the MacArtney Group Supplier Code of Conduct. The code of conduct is aligned with the 10 guiding principles of the UN Global Compact.

## 6. Employees

MacArtney Group has a code of conduct for employees that defines the expected behaviour and ethical standards of our employees.

### The code of conduct has four principles:

*Decentralisation of responsibility* means that we trust our employees and believe that decentralisation creates ownership and proud employees.

*Fascination of technology* means that we are global first movers and provide state-of-the-art products and solutions to our clients. We are curious, embrace development and are willing to learn, adopt and implement new initiatives and methods.

*Long-term partnering* means that we prioritise building strong relations with our stakeholders. We do our best to keep our promises, solve problems efficiently and take responsibility.

*Caring* means that we understand the importance of building strong personal relationships. We care about our clients, suppliers and colleagues, and we are committed to taking a social responsibility.



## 7. Workplace health and safety

The most important resource at MacArtney Group is our employees, and we prioritise their safety, health, and well-being.

MacArtney A/S in Denmark is ISO 45001 certified, and we follow and manage health and safety guidelines and KPIs to create a secure, inclusive and comfortable working environment. This includes systems for identification of hazards and assessments of risks, incident reporting and investment procedure. We also hold safety inspections on a regular basis.

All employees should trust that they can go to work and be safe. This goes for all types of jobs within the MacArtney Group, including jobs carried out at sea and under difficult circumstances. Managers at MacArtney are responsible for providing the frames for a healthy work environment and contributing to a healthy life.

## 8. Diversity and inclusion

MacArtney wants to remain a diverse and inclusive company, where all feel welcome and respected.

Being in an industry that is typically male dominated, we want to promote diversity and inclusion across our business, securing an inclusive and diverse workforce and work environment. Everyone has the potential and the passion to do their best, and differences in backgrounds, preferences and abilities are advantages, that bring our company forward.

We do not tolerate harassment of any kind.

## 9. Whistleblower policy

MacArtney wants to act on principles of accountability, openness, and cooperation, including the ability for employees and collaborators to act on critical matters. The whistleblower system offers a confidential and safe way to report any irregularities or illegalities within the company. We encourage employees to report any violations of this Code of Conduct, company policies, or legal requirements. Reports can be made through the designated Whistleblower reporting channel, which can be found on our webpage. Retaliation against whistleblowers will not be tolerated.

## 10. Data privacy and security

MacArtney Group is committed to protecting the confidentiality, integrity, and availability of its information assets through a global information security policy to safeguard and protect commercially sensitive and personal data concerning employees, customers and third parties. The policy is also designed to provide direction and guidance to MacArtney in meeting its commitment to comply with external regulations and security requirements such as the General Data Protection Regulation (GDPR) and Cybersecurity Maturity Model Certification (CMMC).

MacArtney Group respects the privacy of personal and sensitive information. We adhere to data protection laws and take measures to secure company and customer data.

## 11. Violations

Violation of this Code of Conduct may result in disciplinary actions, up to and including termination of employment or business relationships and may also lead to legal consequences.