



Code of Conduct

Doing the right thing





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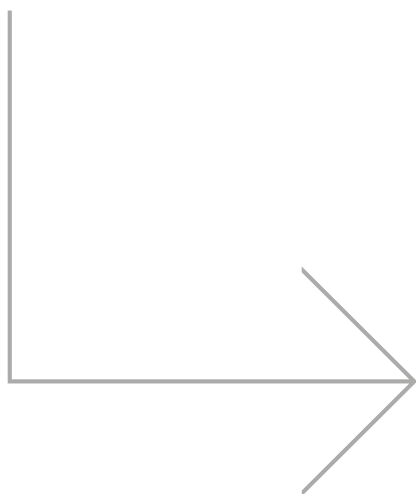
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Doing the right thing



Jean Vernet
Chief Executive Officer

Message from the CEO

The way we do business is as important as what we aim to achieve above, below and beyond the ocean's surface. United by a common purpose to harness the blue economy for future generations, we have an exciting future ahead to become the leading provider of unique marine solutions around the world.

Our customers place their trust in us to solve some of their most complex challenges. They expect us to do the right thing, to deliver to the highest standards, offer creative and innovative solutions, and act with integrity in everything we do.

The Code of Conduct (the Code) is more than following laws and regulations. It's about embracing and living our Valued Behaviours. It establishes the standards and behaviours expected of us, it defines the way we work and supports us to make the right choices to work in a fair, open and honest way.

This means speaking up in good faith when something doesn't feel right, taking action when necessary, and supporting others to do the same.

As CEO, I am personally committed to upholding the Code and ensuring that our leadership team always leads by example. Every one of us is responsible for understanding the Code and staying true to all it represents, helping to maintain a culture of openness, honesty and accountability.

With our Valued Behaviours to guide us, we do our best work when we do it with purpose and when we do it together.

Thank you.

Jean Vernet
CEO

Our Valued Behaviours

Act With Integrity

Do the right thing.
Respect and trust each other to deliver on our commitments, safely and sustainably.

- Think safety first
- Be accountable

Pursue Excellence

Deliver to the highest standards.
Think and act with purpose, turning our passion and energy into exceptional results.

- Commit to quality
- Deliver results

Think Creatively

Be curious and innovative.
Harness our pioneering spirit to solve complex challenges of today and tomorrow.

- Spark new ideas
- Inspire change

Embrace Teamwork

Support and inspire each other.
Collaborate to unlock our collective potential as one team and in partnership with our stakeholders.

- Partner and grow together
- Empower each other

Purpose of the Code of Conduct

Doing the right thing means we must always act with integrity to ensure we are trusted by our colleagues, customers, business partners, shareholders and the communities in which we work.

It defines James Fisher's commitment to the highest standards of ethical behaviours towards all stakeholders (whether internal or external) and sets the expectations in terms of behaviour for all those who work for us.

The Code applies to (and is mandatory for) all James Fisher employees and anyone working with us or on our behalf, such as partners, suppliers, agents, distributors, contractors and consultants.

Individual responsibility

All of us must be familiar with the Code and apply it every day. Applying the Code means more than following its written guidance; it informs how we make decisions, collaborate with others, and contribute to our shared culture of integrity. If you are unclear about any aspects of this Code or are not sure how to respond to an issue not covered by the Code, always seek guidance from line managers, HR, or the Legal team.

People leaders' additional responsibilities

People leaders are responsible for:

- Ensuring your teams understand and are regularly trained on the Code and underlying policies, standards and procedures
- Ensuring the Code requirements are complied with by your teams and those working with, or for, James Fisher
- Creating an environment where employees can raise concerns or questions about matters covered by the Code
- Modelling behaviours required by the Code (leading by example, walk the talk)
- Ensuring any actual or suspected non-compliance is reported



Using the Code

The Code helps us all make the right decisions by providing practical examples of how to handle ethical concerns.

However it cannot cover every situation that may arise and therefore requires all of us to exercise good judgement and common sense in deciding the right action to take aligned with the principles of the Code.

If unsure, always seek guidance from line managers, HR, or the Legal team.

Speaking Up

James Fisher is committed to a culture of openness where everyone is empowered and feels safe to speak up about ethical concerns.

Our Whistleblowing Policy provides a list of matters that must be reported. We all have a duty to do what's right and to act with integrity. Speaking up is part of acting with integrity and doing the right thing at James Fisher.

How to report concerns

Concerns that must be reported should, where possible, be raised with your line manager or the line manager of your line manager. If this is not possible or you feel uncomfortable doing so for any reason, you can always report to any of the following people:

- Division General Counsel
- Division Head of HR
- Division Finance Director
- Group Head of Ethics and Compliance
- Group General Counsel

Alternatively, you can raise a concern by contacting our Speak Up Service, which is operated by an independent third-party hotline provider. You may submit a report either online at www.james-fisher.com/speak-up or by phone using the relevant number provided on the opposite page for the country in which you are located.

You can either log your report anonymously or add your name. The important thing is that the concern is raised so we can investigate.

No retaliation

If you voice a concern or report a non-compliance in good faith, we will not tolerate any form of retaliation against you. We consider retaliatory behaviour to be a serious misconduct, which, if substantiated, will result in disciplinary action.

Breaches of the Code and investigations

Handling violations

Breaching the Code and any of the underlying policies, standards and procedures can have serious consequences for James Fisher and for each of us as individuals. Those who are found violating them will be subject to investigation and may face disciplinary action up to and including termination.

Investigation process

Any report of non-compliance with this Code or any of the underlying policies, standards or procedures will be handled in accordance with the Whistleblowing Reporting and Investigation Procedure.



If you see something, **say something!** It's easy to speak up

Contact the Speak Up Service online or by phone using the international toll-free numbers listed below:

Americas

Brazil	0800-8920515
Canada	855-229-9304
Colombia	01800-5-183740
Ecuador	1-800-225-528/855-229-9304
Mexico	001-855-366-2458
U.S.	855-229-9304

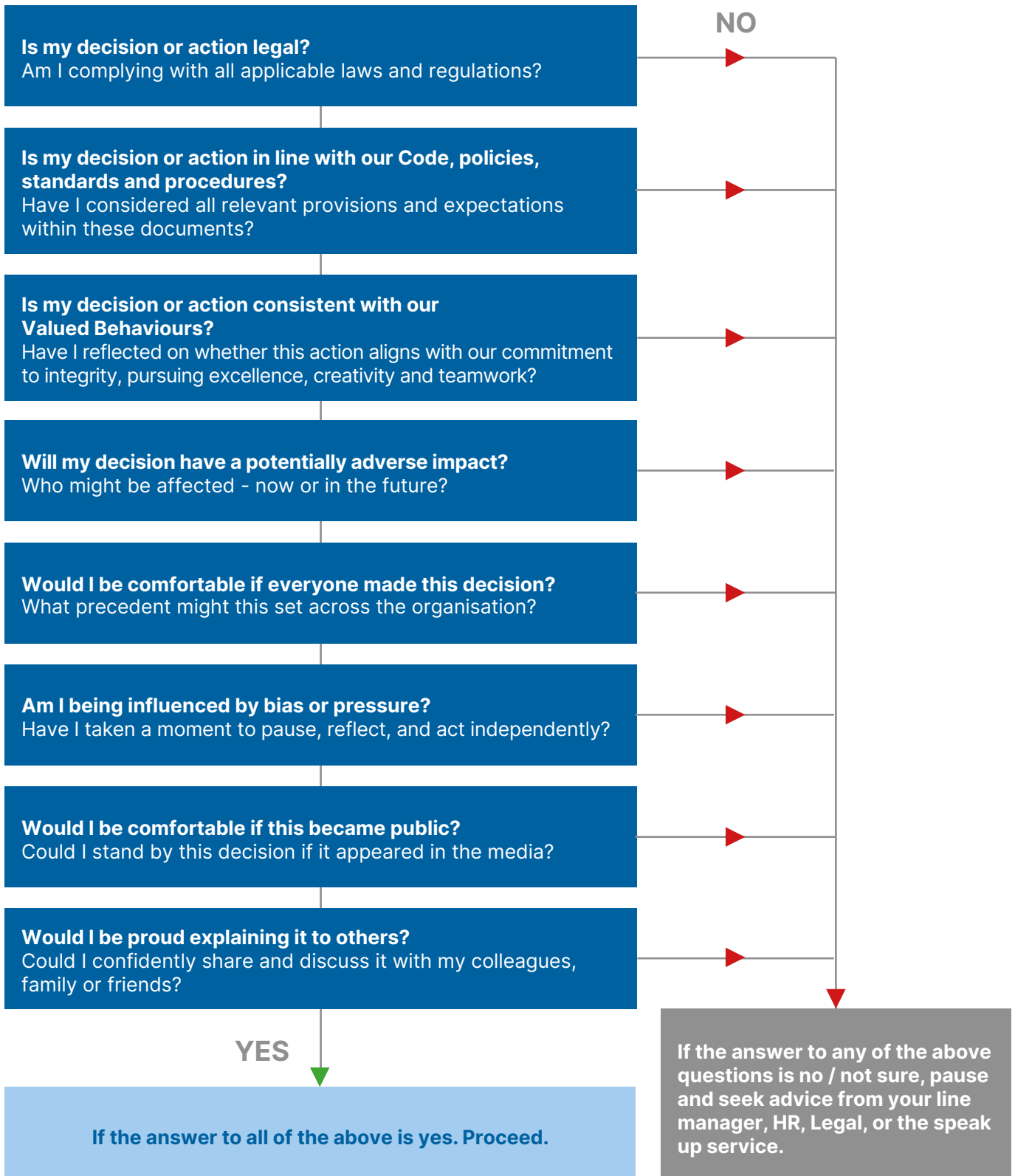
Europe & Africa

France	0800-917075
Ghana	0-2424-26-004/855-229-9304
Ireland	1-800-552-072
Mozambique	704-526-1125
Namibia	704-526-1125
Netherlands	0800-0232214
Nigeria	0-708-060-1816
Norway	800-12183
South Africa	080-09-92887
Sweden	020-79-8389
U.K.	0808-234-7287

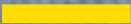
Middle East & Asia

Australia	1-800-139957
Lebanon	01-426-801/855-229-9304
Malaysia	1-800-81-7270
Singapore	800-1102074
Taiwan	00801-10-4471
U.A.E.	8000-021/855-229-9304

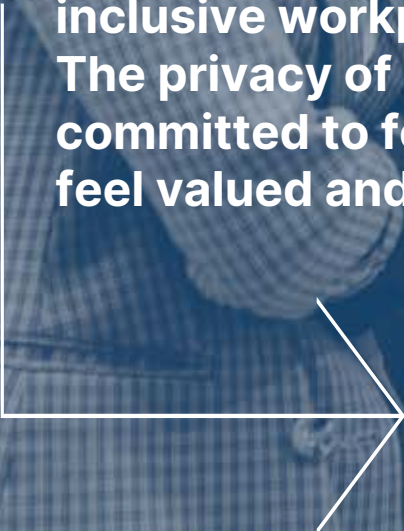
Making the right decision in unclear situations



Our people

A short, solid yellow horizontal bar.

We create and maintain a safe, fair, respectful and inclusive workplace where everyone can thrive. The privacy of our people is respected, and we are committed to fostering an environment where they feel valued and protected.

A white line graphic forming a large arrow pointing to the right, with a vertical line on the left and a diagonal line on the bottom.

Contribute to a safe workplace

We are all responsible for creating a work environment that is safe, inclusive, and respectful for everyone. For health, safety, environment and security, our guiding principle is simple: 'see it, own it, act on it'. A truly productive workplace environment is one where employees can excel without fear of harassment, discrimination, or safety concerns.

Our commitment

We will:

- Integrate sound health and safety practices into our operations and comply with workplace safety regulations policies, standards and procedures
- Operate in a way that protects the environment from pollution and develops sustainable solutions
- Prioritise the security of employees, assets, and information through vigilance and personal accountability
- Maintain a workplace free from bullying, harassment, and discrimination, where everyone's valued and respected
- Encourage open, constructive problem-solving to resolve conflicts fairly and promptly
- Ensure everyone follows our workplace policies, standards and procedures, including the Alcohol and Drugs Standard
- Lead by example, fostering a culture where everyone is accountable for their actions

Hypothetical scenario

Q: Whilst working in an onshore yard, you notice that a container holding hazardous chemicals is leaking onto the floor. Some co-workers suggest waiting until the end of the shift to deal with it, as production targets must be met. What should you do?

A: You should act immediately. Any chemical spill poses a serious risk to health, safety, and the environment, and must be addressed without delay. Stop what you are doing and alert your supervisor or the designated HSE representative immediately. Follow company spill response procedures. Never prioritise productivity over safety and environmental protection, the well-being of everyone and the environment always comes first.

Examples of misconduct

- X** Ignoring or bypassing safety procedures: Failing to wear required personal protective equipment (PPE) in designated areas, or deliberately disregarding established safe working practices
- X** Failing to report hazards and incidents within Intelix (our safety reporting system): Not reporting incidents, unsafe acts and hazardous conditions in the workplace, thereby endangering others and the environment
- X** Discouraging or preventing others from using stop work authority: Pressuring colleagues to continue unsafe work or ignoring genuine safety concerns raised by others
- X** Falsifying safety records or reports: Deliberately providing inaccurate information on incident reports, safety inspections, or compliance documentation
- X** Substance abuse at work: Substance-related behaviour that compromises safety, professionalism, or legal compliance, in breach of the company's Alcohol and Drugs Standard
- X** Bullying, harassment, or discrimination: Engaging in behaviour that creates a hostile or disrespectful work environment, contrary to our company's commitment to respect dignity and inclusion for everyone

Further guidance

- Alcohol & Drugs Standard
- Health, Safety, Environment & Security Policy
- People Policy
- Personal Protective Equipment (PPE) Standard
- Stop Work Authority Standard

Promote employee development, and diversity and inclusion

We are committed to a workplace where every employee can grow, develop, and reach their full potential. Through fair recruitment, career progression, learning opportunities, and talent development, we empower individuals to succeed and contribute to our mission, vision and purpose. This commitment is consistently demonstrated by the Board and Executive Committee, helping to embed these principles across James Fisher.

Our commitment

We will:

- Ensure fair and transparent recruitment processes that provide equal opportunities at all levels within James Fisher
- Promote career development, internal mobility and succession planning to retain talent and ensure workforce stability
- Provide inclusive and accessible learning and development opportunities supported by a clear and constructive performance review process
- Recognise and reward employees based on contributions, proficiency, and alignment with company Valued Behaviours
- Support employee wellbeing through flexible working inclusive wellbeing programmes and a workplace culture where all employees feel safe to speak up and contribute, and are treated with respect

Hypothetical scenario

Q: Your team organises mandatory training for career development, but only offers it during working hours at the head office in London. Remote and international employees express concerns that they are unable to attend due to logistical challenges. Should the training be made more accessible?

A: Yes. Limiting training to one format or location can unintentionally exclude parts of your team. By providing flexible access such as online sessions or recordings, you will support fair development for everyone.

Examples of misconduct

- ✗ Offering career advancement opportunities solely through informal networks or manager nominations, bypassing transparent and fair selection criteria
- ✗ Ignoring employee feedback about barriers to accessing development opportunities particularly if this results in unfair or inconsistent treatment
- ✗ Rewarding employees solely based on tenure or personal preferences, rather than demonstrated contributions, capabilities and performance metrics
- ✗ Overlooking disproportionate workloads or excluding individuals or certain groups from wellbeing initiatives, which may result in burnout or unequal participation
- ✗ Failing to address biased language or behaviour in development programmes or feedback processes that may potentially discourage full engagement from diverse employee groups

Further guidance

- People Policy
- Recruitment & Talent Policy
- Reward, Recognition & Wellbeing Policy

Avoid and disclose conflicts of interest

Every decision we make should be in the best interest of James Fisher and free from personal bias. We must recognise, avoid and disclose situations where our personal interests conflict, or appear to conflict, with our job responsibilities.

Our commitment

We will:

- Recognise the various ways actual, potential, or perceived conflicts of interest may arise
- Take proactive steps to avoid actual, potential, or perceived conflicts of interest
- Disclose all actual or potential conflicts of interest to line management and seek guidance from the Legal or HR teams when unsure
- Implement appropriate measures to effectively manage conflicts of interest when they arise, ensuring they do not impact impartial decision-making

Hypothetical scenario

Q: As a facilities manager you help select a vendor for office supplies. Your cousin owns an office supply business, and you recommend them as a supplier to James Fisher without disclosing your relationship. Is this acceptable?

A: No. This creates a conflict of interest as personal relationships could unfairly influence your decision to recommend this supplier. Even if the company offers competitive prices, your recommendation without disclosing your relationship undermines fairness in the selection process. To uphold integrity, you should disclose your relationship and remove yourself from the decision-making process to ensure a fair and unbiased vendor selection.

Examples of misconduct

- ✗ Hiring or promoting a family member without disclosing the relationship potentially favouring that family member over other more qualified candidates
- ✗ Failing to disclose additional employment with one of our competitors, suppliers or customers
- ✗ Failure to disclose that a family member works for one of our existing or potential suppliers, especially when you are involved in procurement or vendor selection
- ✗ Holding an investment in another company which is a competitor, supplier or customer of James Fisher without informing the company

Further guidance

- Conflict of Interest Policy
- Conflict of Interest Standard

Honour privacy

We respect privacy and handle personal information lawfully and responsibly, ensuring it is used appropriately with suitable data security measures in place. Operating across different geographies, we apply our privacy standards consistently while adapting to applicable local laws when required. We expect contractors, suppliers, agents, customers and partners to apply the same high standards in their handling of personal data.

Our commitment

We will:

- Establish a lawful basis for processing personal data and provide clear information on its use
- Process personal data only for specified and legitimate purposes, avoiding incompatible uses
- Collect only the necessary data, maintain accuracy, and promptly correct any inaccuracies
- Retain personal data only for as long as needed and implement suitable security measures to prevent unauthorised access, loss, or alteration
- Respect individuals' rights over their personal information, including access, correction, and deletion requests
- Share personal data only under required controls, ensuring third parties comply with our privacy standards

Hypothetical scenario

Q: A former employee requests the deletion of their personal data but you're unsure if the company still needs it for legal reasons. What should you do?

A: First, you should verify the individual's identity to ensure the request is legitimate. Then, send the request to James Fisher's Legal and HR teams who will assess whether the data must be retained under company policies or legal obligations. James Fisher's Legal team will then provide an appropriate response to the requester.

Examples of misconduct

- ✗ Accessing personal data without a clear business need or appropriate authorisation, even if no harm is intended
- ✗ Retaining personal data in unofficial repositories (e.g. personal drives or email folders) outside approved systems, increasing risk of loss or unauthorised access
- ✗ Sharing personal data informally with colleagues or third parties without verifying whether appropriate safeguards or contractual protections are in place
- ✗ Overlooking updates to privacy notices or failing to communicate changes in data use to affected individuals, especially in cross-border contexts
- ✗ Assuming local practices override global privacy standards without consulting James Fisher's Legal teams, leading to inconsistent application of controls

Further guidance

- Contracting Principles Standard
- Personal Data Protection Policy



Our customers and other partners

We succeed through the excellence of our people, products, services, and technology to deliver safe and effective solutions. We seek collaborators who share our vision of the future. Our Code empowers us to do what's right and uphold fair standards throughout all our operations, while building trust and credibility through a shared commitment to integrity.

Champion product and service quality

We are dedicated to delivering products and services that meet the highest standards of quality, ensuring each meets both regulatory requirements and our customer commitments. While quality forms the foundation of our operations, we never compromise on safety, making it a fundamental part of our dedication to excellence.

Our commitment

We will:

- Comply with statutory and regulatory requirements, national and international standards and James Fisher policies, standards and procedures
- Uphold integrity by always doing the right thing, even when it is challenging or inconvenient, ensuring our actions reflect our Valued Behaviours and ethical commitments
- Actively collaborate with internal and external customers and suppliers
- Promote a proactive approach by encouraging the reporting of any quality issues or concerns, enabling us to implement effective corrective measures
- Perform operations that eliminate waste and prevent defects
- Ensure quality begins with leadership at the top and extends to every employee, with everyone taking responsibility for upholding standards and sharing best practices and lessons learned across the organisation

Hypothetical scenario

Q: During a routine inspection, you find a problem in the process (deviation) that does not harm product quality now, but could cause issues / defects later if ignored. Your team leader suggests not fixing it to keep production on schedule, since fixing it would cause a delay. What should you do?

A: If you notice an issue that could potentially lead to problems in the future, it's essential to report it immediately even if it doesn't currently impact product quality. Addressing concerns promptly ensures high standards are maintained. By speaking up, you help enable corrective actions that protect the integrity of our products and reinforce our shared commitment to quality. Taking action now prevents more significant challenges down the line.

Examples of misconduct

- ✗ Authorising non-compliant products: approving the use or release of products or components that do not meet required specifications, standards, or contractual commitments
- ✗ Not reporting deviations: failing to report detected deviations, defects, or process inconsistencies, even if they seem minor or unlikely to affect immediate product performance
- ✗ Skipping mandatory quality checks: omitting or inadequately conducting required inspections, tests, or verifications in order to save time or meet deadlines
- ✗ Disregarding customer or regulatory requirements: intentionally ignoring specific quality or compliance expectations set by customers or regulatory bodies, which can create risks for users or result in legal violations
- ✗ Falsifying quality records: modifying or making up inspection data, test outcomes, or quality documentation to hide defects or non-compliance
- ✗ Neglecting traceability: failing to properly record the history, location, or status of materials, components, or finished goods, which undermines the ability to trace and resolve quality issues effectively

Further guidance

- Engineering Policy
- Health, Safety, Environment & Security Policy
- Quality Policy



Comply with anti-bribery and corruption laws

We have a zero tolerance to all forms of bribery and corruption. We win business the right way through the excellence of our people, products, services, and technology. We never engage in bribery or corruption, whether directly or indirectly, and expect our contractors, suppliers, agents, and partners to follow the same standards.

Our commitment

We will:

- Never offer, promise, give or accept a bribe, even if permitted by local law or custom
- Never offer or give a facilitation payment even if such payments are permitted by local law or custom
- Not accept or offer gifts, hospitality, sponsorships, and donations if the intent or perceived intent is to inappropriately influence a decision or to obtain an unlawful business advantage
- Conduct risk-based due diligence on all third parties acting on James Fisher's behalf and ensure they share and comply with our zero tolerance approach to all forms of bribery and corruption
- Promptly report any concerns regarding bribery and corruption

Hypothetical scenario

Q: While waiting at an overseas airport to collect your visa on arrival, an immigration official offers to process your visa application immediately to avoid the usual waiting time of two hours on the condition that you pay him US\$50. Many passengers pay it, but no official notice about the fee is displayed. Is it acceptable to pay?

A: No. This is a facilitation payment - an unofficial fee to expedite a routine service that should be provided without charge. Although common in some places, such payments are prohibited. This does not apply to lawful, official fees. Since no official notice exists and the fee is paid to an individual, this would be a facilitation payment which is unlawful and contrary to our policy.

Examples of misconduct

- ✗ Offering, promising or paying a bribe to secure a contract for James Fisher
- ✗ Accepting lavish hospitality from a supplier in return for awarding that supplier with a contract to supply goods or services to James Fisher
- ✗ An employee making an unofficial payment to a customs officer to expedite the clearance of goods from customs
- ✗ Failure to record and obtain approval via the Ethics & Compliance System <https://james-fisher-due-diligence.gan-compliance.com/> when offering gifts or hospitality to a potential customer
- ✗ Appointing a Business Partner to perform services for James Fisher without first complying with the requirements of the Business Partner standard

Further guidance

- Anti-Bribery & Corruption Standard
- Business Partner Standard

Compete fairly

We are committed to open and fair competition, promoting a level playing field where businesses can thrive based on merit, innovation, and fair commercial practices. By competing fairly, we protect our credibility and maintain the trust of our customers and partners.

Our commitment

We will:

- Never share or discuss pricing or other commercially sensitive information with competitors - whether directly or through third parties - in violation of competition and anti-trust laws
- Never engage in any discussions or agreements that involve or could result in price fixing or coordination, supply or production restrictions, market or customer allocation, or bid rigging, in breach of competition and anti-trust laws
- Seek advice from the Legal team whenever there is any uncertainty about anti-competitive practices or potential risks
- Immediately report any suspected anti-competitive behaviour or related enquiries to the Legal team for guidance and action

Hypothetical scenario

Q: A Sales Manager is invited to an informal lunch with a former colleague who now works for a competitor. During the meal, the competitor mentions plans to raise prices next quarter. Is it okay to stay and listen?

A: No. This exchange creates a risk of illegal information sharing and potential price coordination. You should immediately stop the conversation and report the incident to the Legal Department. Even informal conversations can breach competition law if they involve commercially sensitive information.

Examples of misconduct

- ✗ An employee agreeing with a competitor of James Fisher to fix the price at which we will offer similar services to potential customers
- ✗ An employee agreeing with a competitor to divide territories, customers or markets between James Fisher and the competitor entity to avoid competing against each other
- ✗ Any agreement with competitors to James Fisher to artificially inflate prices for a customer tender to ensure that one entity taking part wins the tender
- ✗ Sharing non-public commercially sensitive information (e.g. future pricing, costs or strategy) at industry meetings which may lead to coordinated market behaviour

Further guidance

- Competition Law Policy

Respect trade control laws

We comply with all applicable trade control laws - including export controls, international trade sanctions, and customs regulations - across every aspect of our business. Compliance is essential for safeguarding our operations and for maintaining our credibility and the trust of our customers and partners.

Our commitment

We will:

- Ensure that all imports and exports of goods, services, and information comply with applicable export control laws, international trade sanctions, and company policies
- Not conduct business with comprehensively sanctioned countries, sanctioned or designated individuals, entities, or governments in breach of trade control laws
- Conduct thorough sanctions screening of customers, suppliers and other third parties, including their respective banks in accordance with our Sanctions Screening Procedure
- Not engage in any transactions that seek to circumvent or avoid relevant trade control prohibitions

Hypothetical scenario

Q: You receive an urgent request from a potentially significant new customer to supply James Fisher products to be delivered to their ship. The customer offers to pay all freight costs and full payment in advance. As it's late on Friday evening, you do not have time to complete the usual sanctions screening checks and ensure that the products get to the customer on time. Should you complete the order without conducting the sanctions screening checks so that we secure the new customer?

A: No. As this is a proposal relating to a new customer, we must first complete the new customer onboarding process including sanctions screening checks on both the customer and the vessel in accordance with the Sanctions Screening Procedure.

Examples of misconduct

- ✗ Exporting restricted goods without obtaining the required export license
- ✗ Intentionally misclassifying products under a lower tariff code to reduce customs duties and violating trade compliance regulations
- ✗ Failing to comply with the new customer onboarding requirements resulting in a failure to conduct required sanctions screening before initiating business
- ✗ Failing to obtain a valid certificate of origin for cargo that may be the subject of ship-to-ship transfer services performed by James Fisher
- ✗ Agreeing to complete a transaction involving the direct or indirect shipment of goods to a country subject to a comprehensive trade embargo

Further guidance

- Import Control Procedure
- Sanctions Screening Procedure
- Trade Controls Policy
- Trade Controls Standard

Uphold contracting principles with customers and suppliers

Through fair and responsible contracting, we strive to strike the right balance between meeting the expectations of our customers and suppliers and managing risk and cost exposure for James Fisher. This will help build trust and ensure sustainable commercial relationships with our customers and suppliers.

Our commitment

We will:

- Establish a fair contractual allocation of liability, ensuring our liability is subject to a reasonable limit and aligned with industry standards
- Safeguard our intellectual property (IP) and retain ownership of existing IP while ensuring newly developed rights are clearly defined and protected
- Apply our standard payment terms and ensure the contractual payment process is well-defined, transparent, and fair
- Ensure adherence to all other mandatory requirements of our Contracting Principles Standard
- Obtain legal review and necessary management approval for any proposed deviation from the Contracting Principles Standard before finalising terms and conditions

Hypothetical scenario

Q: A Sales Manager is asked to proceed with agreeing a contract that includes terms inconsistent with our Contracting Principles. What should they do?

A: The Sales Manager must not proceed with finalising the contract. Any deviation from the Contracting Principles Standard requires input from the Legal team and approval through the appropriate internal governance channels to ensure the associated risks are properly assessed and mitigated before any commitments are made.

Examples of misconduct

- ✗ Performing work without a proper signed contract in compliance with the Contracting Principles Standard
- ✗ Omitting payment clauses in a contract or modifying standard payment terms without the required internal approvals
- ✗ Including clauses that expose James Fisher to unlimited liability or fail to cap liability in accordance with the Contracting Principles
- ✗ Naming a customer or any member of its group on James Fisher Group insurance policies, contrary to the Contracting Principles
- ✗ Including warranty terms that extend beyond the standard period or scope without assessing risk and cost implications

Further guidance

- Gatekeeper Procedure
- Legal Risk Policy



Our company and shareholders

We protect James Fisher's performance and assets through effective risk management, responsible information handling, accurate record keeping, and integrity in all financial and operational matters.

Protect confidential information and intellectual property

We must safeguard the confidential information and intellectual property belonging to James Fisher, as well as any sensitive information entrusted to us by our customers, suppliers, and partners. We are committed to ensuring that all intellectual property belonging to James Fisher is protected, confidential information is handled responsibly, and neither is misused by third parties.

Our commitment

We will:

- Safeguard our confidential information, including proprietary business data, financial records, strategic plans, and other sensitive information entrusted to James Fisher
- Protect our intellectual property, including trademarks, copyrights, patents and licensed technology, in accordance with our Intellectual Property Standard
- Ensure that any intellectual property created by employees or contractors in the course of their work belongs to James Fisher, to the fullest extent permitted by law
- Prevent unauthorised use or disclosure of our confidential information and intellectual property by third parties
- Follow all applicable confidentiality agreements when handling intellectual property
- Consult the Legal team for guidance on intellectual property matters

Hypothetical scenario

Q: An employee is collaborating with a supplier on a new project. The supplier requests detailed technical specifications and proprietary manufacturing processes to streamline production. The employee considers sharing the information via email without a formal agreement. Is this allowed?

A: No. The requested information is confidential company know-how and must not be shared without senior management approval. Any sharing must be protected by a signed non-disclosure agreement. The employee should consult the Legal Department before proceeding.

Examples of misconduct

- ✗ Disclosure of confidential information outside James Fisher without appropriate confidentiality obligations in place
- ✗ Failure to handle or store confidential information received from third parties in accordance with applicable confidentiality agreements
- ✗ Sending confidential information held by James Fisher to a personal email or storing such information on a personal device
- ✗ Unauthorised use of third-party copyrighted images, software, or other resources in James Fisher materials
- ✗ Failure to follow the Patent Procedure, including obtaining required approvals before submitting any patent application in respect of an invention

Further guidance

- Copyright Procedure
- Intellectual Property Standard
- Legal Risk Policy
- Patent Procedure
- Trademark Procedure



Use information and systems responsibly

We are committed to protecting our information, assets and systems while ensuring the responsible use of digital technologies that enhance our performance. Each of us has a role in safeguarding these resources, managing records appropriately, and preventing security breaches.

Our commitment

We will:

- Follow company policies, standards and procedures for classifying, accessing, and protecting information, IT systems, and equipment, including managing business records throughout their lifecycle to ensure accuracy and responsible handling, both internally and by external partners
- Be vigilant against potential cyber threats or similar theft or misuse of our data and IT resources
- Immediately report any actual or suspected incidents
- Stay up to date on security awareness training
- Ensure artificial intelligence (AI) is used transparently, responsibly, and in accordance with security and compliance requirements to mitigate risks

Hypothetical scenario

Q: You are preparing a customer report and want to streamline your work using an external generative AI tool recommended by a colleague. To generate a well-structured draft, you input confidential data into the system. The AI provides a useful report, and you consider sending it directly to the client. Is this acceptable?

A: No. Entering confidential data into an external AI tool poses security risks, as these systems may store or process information in ways that could compromise confidentiality. Before using generative AI for work-related tasks, you must confirm whether the tool is approved under company policies. Even if it is, ensure compliance by removing customer details and sensitive information, and verify the accuracy of AI-generated content before sharing it.

Examples of misconduct

- ✗ Downloading unauthorised software or browser extensions that compromise system integrity or bypass security protocols
- ✗ Storing sensitive company information on personal devices or cloud platforms without encryption or approval
- ✗ Using company systems to access or distribute inappropriate or offensive content
- ✗ Failure to report suspicious emails, system anomalies, or potential cyber threats despite recognising warning signs
- ✗ Travel to high-risk countries (as defined in the IT Operational Security Procedure) without informing James Fisher's IT Department, potentially exposing systems or data to elevated security threats
- ✗ Improperly disposing of records, especially when subject to a litigation hold requiring preservation for ongoing or anticipated legal proceedings

Further guidance

- Artificial Intelligence (AI) Standard
- Document Classification Standard
- Document Creation, Retention & Disposal Policy
- Group Document Control Framework Standard
- Information Security Policy
- IT Operational Security Procedure



Prevent insider trading

While working at James Fisher, we may come across confidential information about the company or its customers, suppliers and partners that could affect their share prices if made public. This could be inside information and it may include financial forecasts, major contracts or acquisitions, regulatory investigations, leadership changes, or other market-sensitive developments. It is against the law and company policy to use this type of information to buy or sell shares for your own benefit or on behalf of others. This includes selling or buying other securities such as listed bonds on the basis of inside information. It is a serious criminal offence to share inside information with another person who may use this information to make a trading decision.

Our commitment

We will:

- Never trade securities of James Fisher or any other company when in possession of inside information
- Not recommend or encourage others to trade in securities based on inside information, even if you do not profit from the transaction
- Follow our disclosure procedures to protect confidential information about James Fisher
- Follow the Share Dealing Code
- Report any concerns about potential misuse or improper disclosure of inside information

Hypothetical scenario

Q: You receive an internal report that hints at a possible acquisition but doesn't confirm it. You're unsure whether this qualifies as inside information. What should you do?

A: Do not trade or share this information. If you're uncertain whether the information is material and non-public, always err on the side of caution. Seek guidance from the Legal team before taking any action. They can help assess the situation and ensure you remain compliant with legal and company obligations.

Examples of misconduct

- ✗ Recommending someone else to buy or sell shares based on the inside information that you have about James Fisher
- ✗ Discussing confidential information in public about James Fisher or its customers or suppliers before it is publicly disclosed
- ✗ Accessing or distributing restricted financial documents without a clear business need or authorisation
- ✗ Failing to report suspected misuse or disclosure of inside information by employees or third parties

Further guidance

- Disclosure & Share Dealing Policy
- Share Dealing Code

Manage risk and apply internal controls

Effective risk management and internal controls are vital to protecting James Fisher's performance and ensuring compliance with regulatory requirements. We embed risk awareness and internal control measures into our daily activities to safeguard our assets, detect and prevent inaccuracies, waste or fraud while promoting accountability and enhancing our overall resilience.

Our commitment

We will:

- Follow the internal controls relevant to our roles along with the associated policies, standards and procedures
- Actively identify, assess, and manage risks that could impact our operations
- Maintain transparency by promptly communicating risk and internal control concerns to relevant stakeholders
- Continuously monitor and improve risk management and internal control practices

Hypothetical scenario

Q: A colleague asks you to approve an expense report for a large purchase made without prior authorisation, explaining that the purchase was urgent. Since it aligns with the needs of your colleague's project, should you approve it?

A: No. Approving expenses outside established procedures can undermine the company's control environment and create compliance risks. The correct course of action is to follow the required approval process and report any unauthorised transactions to the relevant team.

Examples of misconduct

- ✗ Faking or manipulating evidence designed to show that controls are working properly
- ✗ Bypassing or overriding controls without permission or valid reasons
- ✗ Not reporting when controls have failed or are likely to fail
- ✗ Failing to report suspected misuse or disclosure of inside information by colleagues or third parties
- ✗ Not properly assessing or monitoring risks or failing to let others know when a risk event becomes likely to happen

Further guidance

- Fraud Prevention Policy
- Risk & Internal Control Policy
- Risk Management Framework Standard

Comply with tax laws

We are committed to managing our tax affairs in a responsible and transparent manner, complying with all relevant tax legislation to ensure our business operations uphold the highest ethical and legal standards. We expect our contractors, suppliers, agents, and partners to adhere to these same principles.

Our commitment

We will:

- Never engage in or facilitate tax evasion, either directly or indirectly
- Refuse to transact business with parties suspected of engaging in tax evasion
- Ensure that all tax filings, payments, and dealings with tax authorities are conducted professionally, accurately, and on time
- Seek external professional advice when needed to ensure compliance with tax laws, particularly in areas of uncertainty or overseas jurisdictions
- Appropriately use tax incentives and exemptions that align with our commercial objectives and legal obligations, ensuring compliance with regulations
- Report any concerns regarding tax compliance or potential breaches of tax laws promptly

Hypothetical scenario

Q: A supplier proposes reducing the price of goods for your business if the payment is made in cash without issuing an invoice or reporting the transaction to tax authorities. This would save costs and expedite the process. Is it acceptable to proceed?

A: No. This arrangement could amount to tax evasion, as it deliberately hides income from authorities, preventing the proper payment of taxes. Engaging in such practices violates our commitment to legal and ethical compliance. All transactions must be transparently documented and reported in accordance with tax regulations.

Examples of misconduct

- ✗ Agreeing to local business practices that involve manipulating financial records to reduce tax, even if advised by consultants or seen as “normal” in the region
- ✗ Delaying or avoiding registration with tax authorities in new markets to postpone compliance obligations
- ✗ Structuring contracts or payments in ways that obscure the true nature of a transaction to gain tax advantages
- ✗ Failing to assess tax risks when onboarding new suppliers or partners, especially in high-risk jurisdictions

Further guidance

- Tax Policy

Our communities and the public



We operate responsibly and sustainably, promoting environmental stewardship and respecting human rights wherever we operate and through our supply chains. We leave a positive impact by considering the social impacts of our operations and respecting the human rights of our people and communities.

A white graphic element consisting of a vertical line and a horizontal line meeting at a right angle, with the horizontal line extending further to the right, resembling a stylized arrow pointing right.



Promote and contribute to our sustainability strategy

Sustainability is at the heart of how we operate. We are committed to responsible business practices that align with our environmental, social and governance (ESG) principles, focusing on three key pillars: People, Planet, and Partnerships.

Our commitment

We will:

- Promote a diverse, inclusive, and equitable workplace while prioritising health, safety, ethical labour practices, and local community engagement
- Reduce our environmental impact through sustainable operations, emissions reduction, and responsible resource management
- Collaborate with customers and suppliers to drive sustainability through strategic partnerships and innovation
- Maintain transparency and accountability through data disclosure and performance reporting

Hypothetical scenario

Q: An employee completes a customer's sustainability questionnaire as part of a tender but includes estimated or fabricated data (e.g., emissions figures, recycling rates or circularity initiatives) without verification, simply to appear compliant or competitive. They do not escalate the uncertainty or seek input from relevant internal teams. Is this acceptable?

A: No. Providing unverified or fabricated sustainability data undermines trust and violates our commitment to transparency. ESG reporting must be accurate, evidence-based, and approved through appropriate channels. You should familiarise yourself with the sustainability requirements through available training resources and, if in doubt, seek guidance from your manager or the Group Head of Sustainability.

Examples of misconduct

- ✗ Inaccurate, misleading or exaggerated sustainability information in marketing, public statements or materials shared with customers, investors or other third parties (green washing)
- ✗ Improper waste disposal or non-compliance with environmental regulations, or internal policies
- ✗ Inadequate due diligence or failure to address known human rights violations and unethical labour practices in the supply chain
- ✗ Discrimination, exclusion, or unequal treatment of diverse groups in the workplace or during third-party engagement
- ✗ Failure to act upon identified ESG-related risks, such as internal audit findings, due diligence results, or risk assessments

Further guidance

- Supply Chain Code of Conduct Standard
- Sustainability Policy
- Sustainability Resource Centre

Respect and promote human rights

Modern slavery - including forced labour, servitude, human trafficking, and child labour - is a crime and a violation of fundamental human rights. We are committed to eliminating these abuses in our operations and supply chain, working pro-actively to prevent exploitation and to protect workers.

Our commitment

We will:

- Actively work to eliminate the risk of modern slavery in our business and supply chain, ensuring compliance with all relevant local and national laws
- Hold our suppliers and partners accountable to human rights standards, requiring them to uphold ethical practices through our Supply Chain Code of Conduct
- Train employees to recognise and address risks of modern slavery, so they can act with confidence and responsibility
- Prohibit child labour and the use of worker-paid recruitment fees

Examples of misconduct

- ✗ Doing business with a supplier known to use forced or bonded labour (e.g. workers unable to leave due to debt or withheld passports)
- ✗ Agreeing to do business with a labour broker who charges illegal recruitment fees to workers
- ✗ Acting in a manner which discourages the reporting of any incidents or suspicions of modern slavery by employees of James Fisher
- ✗ Agreeing to purchase products from a supplier that is known to employ child labour

Hypothetical scenario

Q: During a supplier audit in Southeast Asia, you learn that a subcontractor may be withholding workers' passports and restricting their movement. They claim it's a common practice to ensure employees don't leave before contract completion. What should you do?

A: This practice constitutes forced labour and is a serious violation of human rights. You should report this immediately to your line manager or the Legal team. We do not tolerate such conduct, regardless of local custom or supplier practices. The supplier relationship will be reviewed, and appropriate actions - including potential termination - will follow.

Further guidance

- Anti Slavery & Human Trafficking Policy
- Supply Chain Code of Conduct Standard

