

SBCC COMPLIANCE





COMPLIANCE AT SEABROKERS GROUP

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1. INTRODUCTION

Seabrokers Group AS and all group companies (“Seabrokers Group”) endeavours to deliver excellent service and maintain and promote the highest standards of ethics, integrity and professionalism.

This document presents the fundamental principles and expectations for compliance and ethical behaviour within Seabrokers Group.

Our Compliance Programme is designed to ensure compliance with all applicable laws, regulations and ethical standards whilst conducting our business activities.

2. COMPLIANCE STATEMENT

Seabrokers Group is committed to the highest standards of integrity, upholding legal compliance, ethical conduct and responsible business practices. Our core principles of legal compliance, transparency, accountability, fairness and respect are fundamental to our culture, reassuring our customers and suppliers and driving sustainable success whilst fostering mutual respect among employees, and management.

3. OVERVIEW

At Seabrokers Group we continuously refine our Compliance Programme to reflect new challenges and regulations, ensuring our business operations comply with applicable laws and reflect the pinnacle of industry standards. A respectful and supportive work environment, emphasizing legal and regulatory compliance, health, safety, and personal development, is pivotal to our efficient and profitable operations.

Trust, responsibility, and involvement are key in our relationships, with a strict adherence to our Compliance Programme being mandatory throughout Seabrokers Group. We demand honest, fair, and conflict-free interactions with our customers, delivering timely, high-quality, and cost-effective solutions.

Confidentiality and the protection of sensitive information are paramount, ensuring trust and security in all our dealings. Compliance with legal and regulatory frameworks guides our conduct, with a clear zero tolerance stance against improper influence and a commitment to competitive integrity and environmental stewardship.

In essence, Seabrokers Group’s commitment to compliance and ethical excellence is the foundation of our strategy, ensuring long-term success and upholding our legacy of integrity, trust, and respect.

4. RISK ASSESSMENT AND MANAGEMENT

Seabrokers Group commits to regularly assessing and managing risks associated with our business. This involves identifying, analysing, and implementing strategies to manage potential risks to our ethical standards and compliance requirements.

Management is tasked with fostering a culture of integrity and compliance, responsible for overseeing and enforcing ethical standards and compliance regulations. They are also committed to being approachable for any ethics and compliance-related inquiries or issues.

5. POLICIES

Seabrokers Group has created a Compliance Programme with comprehensive policies and procedures encompassing all business areas. Seabrokers Group meticulously integrates its commitment to ethical practices and compliance within every aspect of our operations. All employees and representatives of Seabrokers Group must adhere to the Compliance Programme.



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- **FINANCIAL CRIME**

Seabrokers Group policies include, but are not limited to, Anti-Bribery and Corruption, Anti- Money Laundering, Anti-Fraud, Anti-Competitive Conduct, International Trade Laws and No Insider Dealing. Our zero-tolerance stance against financial crime, illegal or unethical conduct in breach of our policies is unequivocal.

Seabrokers Group maintains strict and accurate record-keeping to prevent such practices, including a digital Anti-Bribery and Corruption (ABC) Reporting and Due

Diligence Register for transparent, auditable transaction documentation. Our Anti-Money Laundering policy provides that the Money Laundering Reporting Officer (MLRO) oversees compliance, reporting and training. Employees are given clear training, guidance and advice, ensuring transparency and integrity in our interactions.

We actively educate and obligate all employees to adhere to legal standards to prevent any involvement in such activities.

- **GDPR AND DATA ACCURACY**

Seabrokers Group prioritises GDPR compliance and meticulous data management across all aspects of its operations, emphasising the protection of personal information for employees, customers, and partners. Our policy and procedures are designed to uphold data protection standards, ensuring transparency, accuracy, and integrity in the collection, storage, and handling of personal data. We adhere to applicable laws and regulations, focusing on fair and lawful processing, minimizing data breach risks, and securing personal information against unauthorized access or loss.

Responsibilities for data handling are clearly defined within Seabrokers Group and through these comprehensive measures, Seabrokers Group ensures the respectful and lawful treatment of all personal data, reflecting our overarching commitment to privacy, equality, and discrimination-free practices.



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• **ADDITIONAL COMPLIANCE POLICIES**

Complementing these policies, Seabrokers Group proactively ensures that our operations, as well as those of our suppliers and third parties, are free from slavery and human trafficking, mirroring our commitment to ethical labour practices and due diligence.

Furthermore, we champion a workplace environment that values diversity, equality, and inclusion, opposing all forms of discrimination. Discrimination, encompassing any unequal treatment based on characteristics like race, sex, and others, is strictly prohibited, with Seabrokers Group committed to fostering an inclusive environment through positive action in recruitment and reasonable adjustments for disabled employees. Responsibilities for implementation extends to all employees, with a procedure in place for addressing any discriminatory behaviour or breaches in compliance, underscoring our dedication to ethical practices and legal adherence, ensuring everyone associated with Seabrokers Group is treated with respect and dignity.

Collectively, these and our other policies not only define our ethical landscape but also strengthen our dedication to maintaining a lawful, respectful and inclusive business environment.

6. TRAINING AND AWARENESS

To ensure everyone within Seabrokers Group is well-informed about our policies and procedures, our Compliance Programme is readily available and easily accessible on our own intranet and app, SeaU.

Initial training of all policies and procedures within the Compliance Programme is carried out during new employee onboarding and thereafter specialist compliance and related training is completed by each employee at least annually (dependant on role). Both internal training and external professional training providers are used, and records are maintained to ensure that training is up to date and auditable.

All Seabrokers Group policies and procedures are stored and updated within the Policy and Ethics section of our intranet and document system to always ensure availability for accurate reference.

7. IMPLEMENTATION COMPLIANCE PROGRAM

The corporate culture within Seabrokers Group is determined at Board level programme and reinforced by the Group Compliance Manager, together with the managers of group companies, to foster a culture of integrity and compliance.

- **Top-Level Engagement:** It is vital for Board members and management to endorse and maintain the Compliance Programme and emphasise its significance across Seabrokers Group.
- **Resources:** Seabrokers Group commits necessary resources to identify and prioritise risks for mitigation, tailoring measures to the organisation's size, complexity, and specific challenges.
- **Development of Policies and Procedures:** We draft clear and comprehensive compliance policies and procedures to address identified risks, ensuring they are adaptable to Seabrokers Group companies' varying scales and complexities.
- **Training and Education:** Our onboarding process includes induction training and an ongoing personal online training suite to familiarise all employees with the Compliance Programme and their personal responsibilities. We provide specialised training tailored to the roles and risk exposure of employees. Digital systems are in place for reporting non-compliance concerns or suspicions, with compliance themes actively communicated both internally and externally.
- **Monitoring and Auditing:** We conduct regular audits, both internally and externally, to evaluate the effectiveness of our Compliance Programme.
- **Response and Improvement:** Procedures are established for addressing compliance violations, including conducting investigations and implementing corrective actions. We are committed to continuously enhancing our Compliance Programme.

A core aspect of our approach is integrating compliance into Seabrokers Group's culture and values, fostering an environment where ethical conduct and compliance are ingrained in every aspect of our operations.



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