

# SwappsPOB Code of Conduct

At SwappsPOB, we uphold the highest standards of integrity, professionalism, and ethical behavior in all aspects of our business. Our Code of Conduct applies to every employee, contractor, partner, and representative associated with our company, ensuring a safe, respectful, and compliant work environment.

## **THE FUTURE IS SMART & SUSTAINABLE**

As regulations tighten and the industry evolves, SwappsPOB remains at the forefront of safe, efficient, and environmentally responsible crew management solutions. By integrating AI, IoT, and automation, we help our clients meet both operational and sustainability targets—ensuring a cleaner, safer future for maritime operations worldwide.



# Core Principles

## Integrity & Honesty

- We conduct business with transparency, fairness, and accountability.
- All communications—whether internal or with clients—must be truthful and accurate.
- Conflicts of interest must be disclosed and managed appropriately.

## Zero Tolerance for Drugs & Alcohol

- **Strict Prohibition:** The use, possession, or distribution of illegal drugs or alcohol during work hours, on company premises, or while operating company equipment is strictly forbidden.
- **Random Testing:** Employees in safety-sensitive roles may be subject to random drug and alcohol testing to ensure compliance.
- **Consequences:** Violations will result in disciplinary action, up to and including termination.

## Safety & Compliance

- All personnel must adhere to HSEQ policies and regulatory requirements.
- Unsafe behavior or negligence that risks health, safety, or the environment will not be tolerated.
- Employees must report hazards or violations without fear of retaliation.

# Core Principles

## Respect & Professionalism

- We foster a workplace free from discrimination, harassment, or bullying.
- Diversity and inclusion are valued, and all employees must treat each other with dignity and respect.

## Ethical Business Practices

- Anti-Bribery & Corruption: SwappsPOB strictly prohibits bribes, kickbacks, or unethical incentives in any business dealings.
- Data Protection: Confidential and proprietary information must be safeguarded at all times.

# Reporting Violations

Employees and partners are encouraged to report any breaches of this Code through:

- Direct supervisors
- Anonymous whistleblower channels (where available)
- Legal or compliance teams

All reports will be investigated promptly and confidentially.

