



SAFEGUARDING INFORMATION AND ASSETS



Intellectual, physical and financial corporate assets are valuable and must be preserved, protected and managed properly. Personal Data and Intellectual Property (IP) must be safeguarded. Information Technology (IT) and communications facilities should be used responsibly. Records must be accurate and appropriately retained. Fraud, theft, abuse or misuse of Green Ocean*'s assets is unacceptable.

PROTECTION OF ASSETS

Corporate assets can be financial, physical or intangible and include buildings, equipment, funds, software, know how, data, patents and other IP.

Your Responsibility

You must protect Green Ocean* assets against waste, loss, damage, misuse, theft, misappropriation or infringement. You must use Green Ocean* assets appropriately and responsibly. You must respect the physical and intangible assets of others. A failure to follow the requirements of this Code or any laws or regulations may result in disciplinary action, including termination of employment.



INTELLECTUAL PROPERTY

IP assets and rights, including patents, trademarks, know how, and trade secrets relating to Green Ocean*'s operations or technologies are among Green Ocean*'s most valuable assets. IP is a key strategic tool for achieving business objectives and must be managed with proper care.

Your Responsibility

You must follow the Green Ocean* IP Standard.

The Principles

- Each business and substantial sub-unit of a business must have IP strategies.
- Green Ocean* companies must properly protect Group IP.
- Third-party IP rights must not be knowingly infringed.
- Green Ocean* companies must comply with inter-Group arrangements on IP.
- Intellectual Property Services (IPS) must be consulted in a timely manner about transactions and IP-related agreements, which should be made with proper authority and implemented as agreed.
- IP disputes and related communications must be handled through Green Ocean* Management.

PERSONAL USE OF IT

IT and communication facilities include personal computers, mobile and desk phones and personal digital assistants. A limited use of Green Ocean* IT and communication facilities for personal use is currently generally acceptable but could be reviewed.

Your Responsibility

You should apply high ethical standards, comply with applicable laws and regulations, and ensure you meet Green Ocean*'s security requirements when using Green Ocean* IT and communication facilities. Your personal use of Green Ocean*'s IT and communication facilities should not incur more than a nominal cost or negatively affect productivity. Improper use of these facilities could be illegal and could damage Green Ocean*. Green Ocean* may report illegal use to the proper authorities.



The Principles

- Ensure your personal use of Green Ocean* IT and communication facilities is occasional and brief.
- Do not use the Green Ocean* network or data storage space on the network for entertainment purposes or to store your personal data.
- Remain in control of the IT and communication facilities you are responsible for if others use them.
- Do not upload, download, send or view pornography or other indecent or objectionable material or material that is illegal or which could cause offence, anxiety, inconvenience or annoyance to your colleagues.
- Include the Green Ocean* name or brand in your business communications but remove it from personal emails.
- Use Green Ocean* security measures.
- Ensure you comply with the Communications requirements as laid out in this Code.
- Get authorisation before installing software or connecting hardware.
- Do not use Green Ocean* IT or communication facilities for unlawful or immoral activities or purposes (including the violation of IP rights or the commission of cybercrime), or to gamble, or to conduct your own business activities.

Challenge Yourself

- Can you explain and justify your personal use?
- Have you uploaded, downloaded or transmitted objectionable material?
- Have you removed the Green Ocean* footer from personal emails?
- Did you receive approval to install software?



DATA PRIVACY AND PROTECTION (DP)

DP laws safeguard information about individuals. This information includes name and contact details, employment and financial information, age and nationality. Information on race or ethnic origin, religion or philosophical beliefs, health or sexual orientation, criminal behaviour or trade union membership is sensitive personal data and subject to stricter controls. Green Ocean* respects the basic right of individuals - including employees, customers and suppliers - to privacy.

Your Responsibility

You must respect a person's right to privacy and follow applicable laws and Green Ocean*'s internal privacy rules when gathering or using their data. Personal information about individuals must be protected from misuse. You must follow correct procedures when collecting, using and sharing this data. Failure to keep personal data confidential and secure could lead to dismissal and prosecution. Protect personnel and business files which contain personal data.

The Principles

- Follow Green Ocean*'s DP when gathering, handling, storing, using or sharing personal data.
- Use appropriate physical and IT safeguards. Tell Green Ocean* if you know of or suspect any security lapses.
- Do not gather, handle, store, use or share personal data unless that information is really needed and you are allowed to by law. Inform individuals why you are collecting their personal information.
- Check the DP Manual whether an individual's permission, before using or sharing personal information, is necessary.
- Observe legal restrictions on the transfer of personal data.
- Do not keep personal information longer than necessary, and then securely delete, destroy it or make it anonymous.

Challenge Yourself

- Do you understand the DP laws and Green Ocean*'s internal privacy rules?
- Are you allowed to collect, use, and store or share this information?
- Have you told the individual why you are collecting this information?
- Did you obtain the individual's permission to use or share this information?



RECORDS MANAGEMENT

Records are valuable company assets and must be properly managed. Green Ocean* must be able to retrieve Records quickly and reliably. When a Record's retention period is over, appropriate disposal is required.

A Record contains information that is evidence of a business activity or required for legal, tax, regulatory and accounting purposes or is important to Green Ocean* business or corporate memory. It is the content which determines a Record not its format.

Records include contracts; audit reports; financial information; product specifications; corporate policies, guidelines and procedures; minutes of meetings.

Your Responsibility

You must understand which information is a Record which must, therefore, be properly managed and which must be disposed of when no longer of value. Failure to manage Records effectively can lead to significant business risks that may have negative financial, competitive, reputation, compliance and regulatory consequences and can breach legal, accounting, tax and regulatory requirements. Individuals must manage their Records.

The Principles

- All individuals must manage their Records in accordance with Green Ocean's* Guidelines.

Challenge Yourself

- Do you know what your Records are and how to identify, classify and store them?
- Are your Records protected from unauthorised access or interference?
- Have you preserved all information relevant to actual or anticipated litigation, regulatory investigation or tax audit?
- Have you transferred custody of the relevant Records when changing role?