



**Document  
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**Code of Conduct**

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## Code of Conduct

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SUMMARY OF CHANGES	
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## 1. Introduction

Delta Maritime's Code of Conduct is a public statement and a valuable resource for employees and others, with which we commit to perform our activities in a professional manner and ensure that all the parties involved, both internally and externally, will conduct and take decisions in an informed and ethical manner.

Because no code of conduct can cover every possible situation Delta Maritime relies on its employees and business partners to use good judgment and to speak up when they have questions or concerns.

The fact that our activities serve Freight Forwarding & Logistics needs around the globe with a diverse business associates and customers base there may be times when local laws, regulations or customs conflict with our Code. Whenever there is a conflict or a difference between an applicable legal requirement and our Code, you must apply the strictest standard.

There will be zero tolerance for anyone that performs activities or follows customs that violate our Code of Conduct.

Our Code applies to all employees, officers, and members of the Board.

Business partners, including operated joint ventures and third parties, can have a direct impact on our reputation through their behavior. For this reason, we want to work with business partners that share our commitment to safety and ethics and compliance. We expect and encourage all our Subcontractors and their employees to act in a way that is consistent with our Code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

### **Our employees are responsible to:**

- Go through a formally documented induction session at the time of employment and once at the end of the year, in order to get familiarized with our policies, code of contact and ethics.
- Certify annually, with approval from our Compliance team, that they have acted in accordance with our code of contact and ethics.
- Act in a manner that is safe, ethical, and consistent with applicable laws and regulations, Delta Maritime's Requirements, values, behaviors and our HSSE goals.
- Raise questions and concerns if they become aware of possible violations of laws, regulations, our Code or Delta Maritime's requirements.
- Co-operate fully when responding to an investigation or audit.

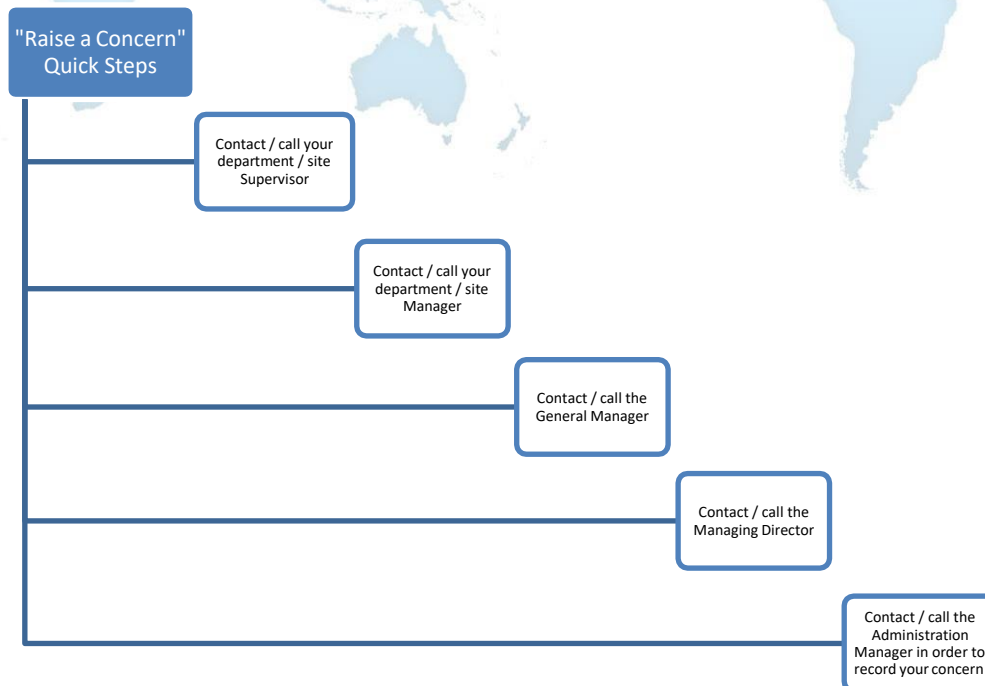
**Our Managers, in addition to the above, are also responsible to:**

- Be a positive role model and support their team members by:
  - Creating an environment that is respectful and inclusive.
  - Encouraging them to speak up.
  - Listening and responding to concerns when they are raised.
  - Doing your part to make sure that no one experiences retaliation for speaking up or co-operating in an investigation.
- Help their team members understand the principles and expectations of our Code, Delta Maritime’s Requirements and applicable laws.
- Be consistent when enforcing our requirements and holding people accountable for their behavior at work.

## 2. Raise a Concern

Each of us has a responsibility to speak up if we see something unsafe, unethical or potentially harmful. If you have a question, need help or want to raise a concern you must follow the below “Raise a Concern” Quick Steps and move to the next step if the mentioned responsible person can’t be reached or is not available.

In any case any one of company’s employees can address any member of staff, irrespective of their ranking level as well as any member of the managerial team, in order to raise a concern they have without taking their ranking into consideration.



Delta Maritime does not tolerate retaliation. We consider acts of retaliation to be misconduct. Retaliation can take many forms, for example: threats, intimidation,

exclusion, humiliation, and raising issues maliciously or in bad faith. If you think that you or someone you know has experienced retaliation, follow any of the above “Raise a Concern” Quick Steps.

### 3. Code of Conduct

Delta Maritime is committed to safety, protecting the environment and respecting the communities in which we operate. We are committed to avoiding damage to the environment and related impacts on communities.

Delta Maritimes health, safety, security and environment (HSSE) goals are:

- No accidents
- No harm to people
- No damage to cargo
- No damage to the environment

Delta Maritime always operates safely and securely. Nothing is more important to us than the health, safety and security of our workforce and the communities in which we operate, and behaving responsibly towards our shared environment. We must be vigilant, disciplined, and always looking out for one another.

There will be zero tolerance to threats, intimidation and violence.

Each of us is a role model for safety and we should all perform works under the below principals:

- Do not undertake work that you are not qualified to perform.
- Stop work, your own or others’, if you consider it unsafe.
- Play your part in protecting the environment – make it a personal priority.
- Be sure that your performance is not impaired, for example by a lack of sleep, alcohol, or any drugs – including prescription or over the counter medication.
- Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.
- Expect and encourage Subcontractors and others with whom we work to comply with applicable HSSE requirements.
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.
- Know the emergency procedures that apply where you work.

Our people are key to Delta Maritime’s success. When we respect and value one another we succeed individually and as a company. We all have a role in maintaining a culture based on respect and fairness.

In Delta Maritime we believe that diversity and inclusion build teamwork and success. We value the unique contribution that each person brings to the company. We accomplish more when people from diverse backgrounds and with different talents and ideas work together in an environment where everyone can contribute and make full use of their talents.

- We treat everyone with respect.
- We encourage and listen to those who speak up.
- We are respectful of cultural differences.

In Delta Maritime we treat everyone with fairness, respect and dignity. We expect those we work with to act in a way that is consistent with our sense of fairness and equal opportunity.

- Base your work-related decisions on merit – not on race, color, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by applicable laws.
- Offensive messages, derogatory remarks and inappropriate jokes are never acceptable

In Delta Maritime we have zero tolerance for any form of abuse or harassment. This includes actions that can reasonably be considered as offensive, intimidating or discriminatory, as well as any form of sexual harassment. Remember that harassment does not have to occur in the workplace or involve a Delta Maritime employee to violate our Code or the law.

- Help create a work environment free of all forms of harassment.
- Inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated.

Delta Maritime respects the privacy of its employees and will only take an interest in what employees do outside of work if it affects company’s reputation or legitimate business interests. We only use personal information when needed to operate effectively or comply with the law.

Delta Maritime works with its business partners in an honest, respectful and responsible way. We are a company on which others can rely. Delta Maritime gains its competitive advantages through strong performance rather than through unethical or illegal business practices. We build and maintain strong relationships with suppliers and business partners. Our suppliers and business partners are essential to our ability to do business and meet our company’s expectations. That is



why we choose carefully and use an objective selection process. We seek to work with others who share our commitments to safety and ethics and compliance.

- Communicate clearly our relevant expectations to our suppliers and business partners, agreeing contractual obligations where applicable. Take the appropriate measures if they do not meet those expectations or obligations.
- Report any indications that a supplier or business partner is not complying with applicable laws or their contractual obligations.
- Make sure you know and follow the Delta Maritime’s requirements that apply in your business. This includes government contract requirements and joint venture requirements.

Delta Maritime does not accept or provide gifts or entertainment in return for any business, services or confidential information, or if the intent is to bias a decision.

- Some gifts and entertainment are never acceptable as they may be illegal or could damage our reputation; for example, anything that could be seen as a bribe or that is indecent or improper.
- Obtain Legal approval before paying travel expenses for government officials or agreeing to pay a per diem in connection with their travel.

In Delta Maritime we encourage our employees to be proactive and manage conflicts of interest. A conflict of interest may occur when your interests or activities affect your ability to make objective decisions for Delta Maritime.

- Be aware of the many different ways in which conflicts of interest can occur. For example:
  - Outside jobs and affiliations with competitors, customers or suppliers.
  - Working with close relatives, especially those who are government officials.
  - Having an intimate relationship with another employee who can influence decisions such as salary, performance rating or promotion.
  - Serving as a board member of another organization.
  - Investments, including those of close relatives, which might influence or appear to influence your judgment.
- Disclose situations that might create a conflict, or even the appearance of a conflict to your department / site manager.

Once disclosed, we then have the opportunity to better address the situation.

In Delta Maritime we avoid anti-competitive conduct. Competition and antitrust laws are complex and often fact specific. For this reason if you have any questions consult



the General Manager. Never engage in any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply.

Delta Maritime respects international trade laws. We abide by the trade laws of all countries in which we operate including economic sanctions, import and export laws. Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws. Products intended for import or export, including equipment, software, and technology, must be classified in advance, and all required labeling, documentation, licenses and approvals completed. If you have any questions speak to the General Manager.

Delta Maritime commits to prevent money laundering. Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support crime or terrorism.

- Never become involved in money laundering.
- Know who you are doing business with by following our counterparty due diligence procedures.
- Raise concerns where you see them.

In Delta Maritime we are committed to work together with governments and communities to contribute to sustainable growth, create jobs and invest in people. We engage with communities and respect their rights and dignity. We want to be a trusted neighbor in the communities where we operate and live. Maintaining an open, ethical stance and respecting diversity, local cultures and customs make a positive difference. We encourage participation in the local community.

- Notify the General Manager in advance of speaking with representatives of community organizations or non-governmental organizations (NGOs).

Delta Maritime commits to respect human rights. We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labor, human trafficking and forced labor.

- Report any human rights abuse in our operations or in those of our business partners.

Delta Maritime stands firm against bribery and corruption. There will be zero tolerance for bribery and corruption in any of its forms in our business. We comply with anti-bribery and corruption laws and regulations and support efforts to eliminate bribery and corruption worldwide. We work to make sure that our business partners share our commitment.

- Do not offer or accept bribes, kickbacks or any other kind of improper payment including facilitation payments.
- Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.
- Know who you are doing business with by following our counterparty due diligence procedures.

For Delta Maritime it is essential that its public communications are clear, accurate, consistent and responsible.

- Remember that your social posts and comments are not anonymous and can negatively impact Delta Maritime’s reputation.
- Only authorized persons can talk to the media or members of the investment community.
- External presentations can be an excellent way to share our expertise with others, but make sure you have the required approvals before accepting any invitation and obtain the necessary approvals on content.

In accordance with applicable laws, Delta Maritime exercises its right and responsibility to make its position known on relevant issues. As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of Delta Maritime.

- Do not use company funds or resources to support any political candidate or party.
- Obtain approval before engaging in any lobbying activities.
- Personal political activities can sometimes create a conflict with Delta Maritime. Talk to the General Manager if you or a close relative are planning to accept or seek a public office, or if any other political activity might have an impact on Delta Maritime or on your job.

Delta Maritime and its employees have the responsibility to protect company’s name, take care of our assets and resources and to be honest and transparent about our operations and performance. We commit to maintain accurate and complete information and records. All of us contribute to the process of recording financial and non-financial information. While protecting our interests, we must be open and honest about our business and performance – good and bad. Business partners, government officials and the public rely on our accurate and complete disclosures and business records. Such information is also essential within Delta Maritime so that we can make good decisions.

- Ensure all transactions are properly authorized, recorded and reported, as required.

- Follow applicable laws and Delta Maritime’s requirements when creating, maintaining, retaining or destroying documents including those in electronic formats.
- Make sure you have the necessary approvals when you respond to a request for information from a government or regulatory agency.

Delta Maritime employees are all responsible for protecting its assets. Company assets include facilities, property and equipment, computers and IT systems, information, corporate opportunities and funds.

- Be conscientious and act appropriately to ensure company assets are not damaged, misused, or lost.
- Make sure your user IDs and passwords are secure.
- Computer equipment, phones, email and internet access are provided for business purposes and monitored regularly to help Delta Maritime defend against cyber-attacks and malicious activity. Limited personal use will usually be acceptable.
- Protect Delta Maritime information. Be especially careful when handling confidential and secret information by encrypting it when required and sharing it only with authorized parties. Do not share Delta Maritime information in public forums or on social media.
- Be vigilant against cyber-attacks and scams such as phishing and report immediately any incidents, including potential or actual losses of Delta Maritime information or assets.
- Guard our intellectual property and respect the intellectual property rights of others.

#### 4. Rewarding Scheme

All rewards will be collective and will be decided after evaluation of the Delta Team performance.

#### 5. Disciplinary Program

There will be **ZERO TOLERANCE** for anyone violating any HSE regulations

For any other incident of non compliance with the Code of Conduct regulations and guidelines a warning will be issued. If anyone violates any of the rules for a second time he will be immediately dismissed.

#### 6. Training

Delta Maritime’s P.C. Training program is formally documented and it consists of the below, but not limited to, sessions:

- Training on our Code of Conduct to all newly hired employees
- Yearly training on our Code of Conduct to all employees
- Ad hoc training for the requirements on the Code of Conduct of each Project undertaken
- Ad hoc training after any major change on the Code of Conduct for all existing Projects
- All personnel will participate in all required Code of Conduct induction sessions performed by any specific project principal contractor
- Daily discussions during Toolbox meetings about selected topics on the Code of Conduct.

All training session will be formally documented and an historical record of attendance will be kept and will be available to all employees, Management and Principal Contractors.

Delta Maritime Compliance Team will be responsible to monitor and audit the training schedule on a yearly basis and at any time deemed necessary.

## **7. Control and Monitoring**

Compliance to our Code of Conduct from all personnel is mandatory.

All personnel receive a copy of the Code of Conduct and signs for the receipt.

Responsible for monitoring the compliance from all personnel is the Delta Maritime Compliance Team which is formed each year by three members of the company's management.

1. Managing Director: Demertzidis Sokratis
2. Director Business Development: Papamichail Lina
3. One person from the Management Team (Yearly rotation between the Managers)