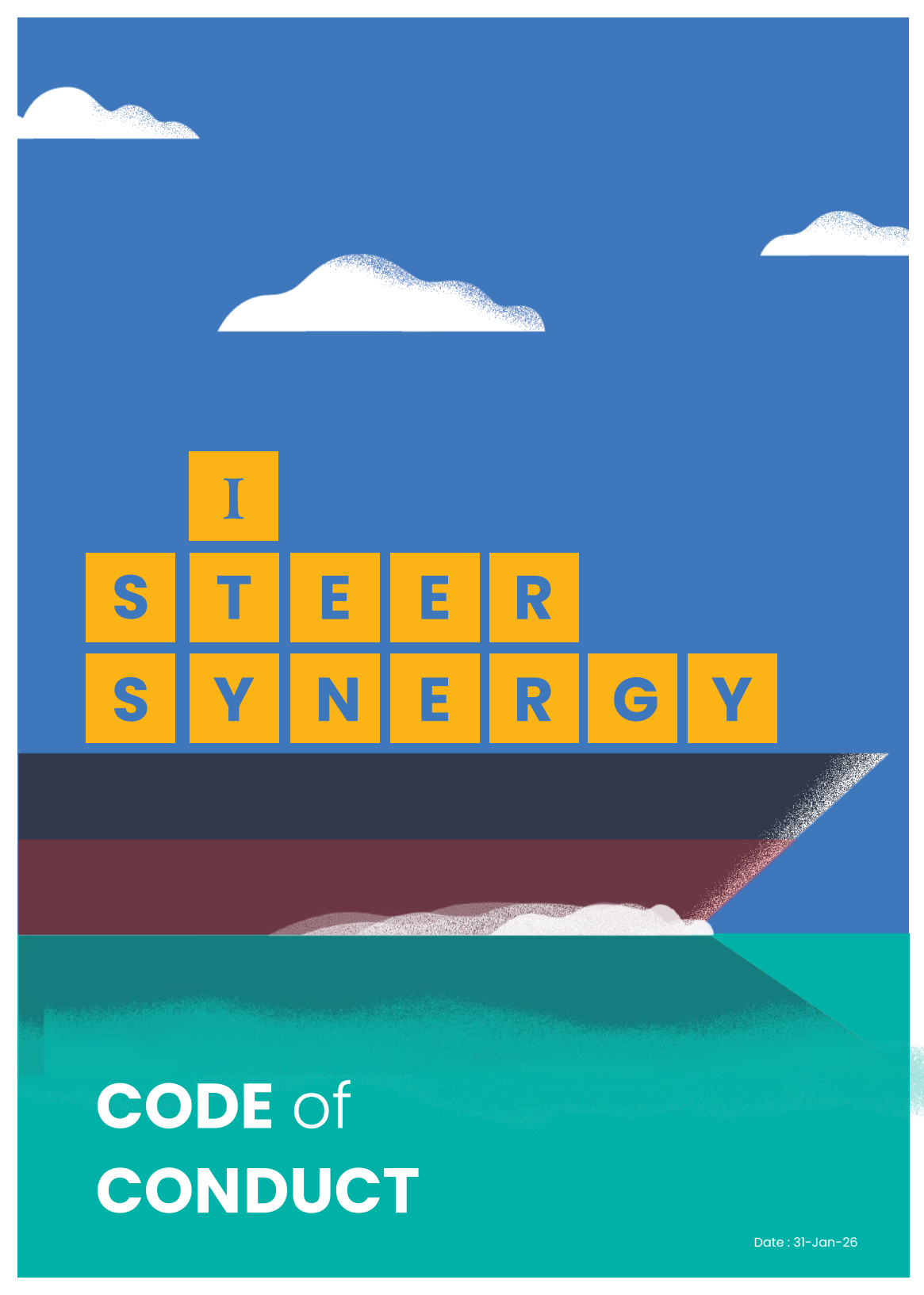
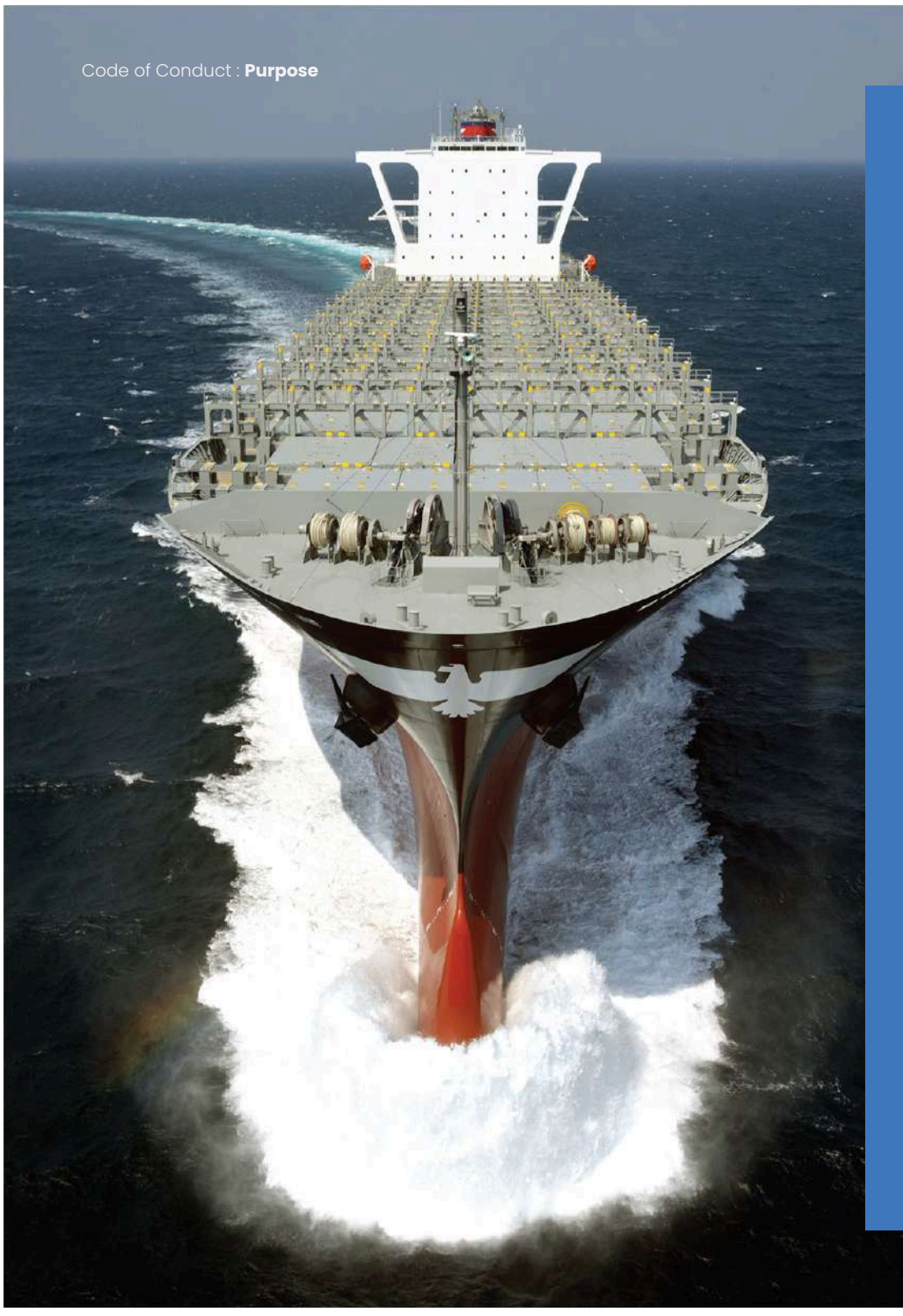




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S T E E R
S Y N E R G Y

CODE of CONDUCT

Date : 31-Jan-26



Purpose

Code of Conduct is to help Synergy group members to make the right decisions and remain true to our core values. This publication provides sound advice to come out clean from the situations.

These core values are the base of the company and they are non-negotiable. Personal commitment to these codes ensure our performance and earning of reputation in highly competitive ship management environment.

Complacency should not lead anybody to break the rules or create unacceptable risk for themselves, their colleagues and to the management.

Core Values

Code of Conduct : **Core Values**

Our core values are the deeply held beliefs and are the seeds of our organizational culture. They serve as a compass for our actions and describe how we behave both individually and collectively.

Our anagram '**i-STEER Synergy**', helps in instilling the core values into every individual in our organisation. By living these values, SYNERGY aspires to set a high standard of excellence



Integrity

Integrity is the core value that defines our organization and the way we do our business at all times – during period of success as well as during challenging times.

Safety

Safety is our business as well as our commitment to future. We work towards setting new industry standards in safety of people and the environment.

Transparency

We believe in being proactive, direct, and honest in our communications. We consider transparency a critical factor in building relationships.

Empathy

People are our biggest assets. Empathizing helps in understanding the individual as well as the environment that he is in. Empathy, as a part of the just culture enhances safety.

Empowerment

We believe in empowering people with courage, freedom and confidence to take right decisions. We encourage them to be accountable for their actions even when they commit mistakes.

Respect

We believe that respect is the foundation of a good organization. At Synergy, all our actions are driven by respect towards self, others and environment.

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SYNERGY

We believe that “**The whole is greater than the sum of its parts**”. Synergy based on mutual trust and confidence is our key strength – and we constantly strive to align our individual abilities to achieve organizational goals and shared vision. By living these values, “SYNERGY” aspires to set a high standard of excellence worldwide.

Application

Code of Conduct : **Application**

This Code applies to
all Synergy personnel

- **Ship personnel** sailing under the management of synergy group.
.....
- **Office staff** employed by synergy group.
.....
- **Contractors and consultants** who are agents of, or working on behalf of, or in the name of a synergy group



Contents

Section 1

Synergy
Personal Responsibility **1**

Manager
Responsibility **3**

Health, Safety
And Environment **5**

Labour
Standards **9**

Engagement of
Third Parties **15**

Anti Corruption
Policy **17**

Interaction with
Government Officials **29**

Harassment
and Bullying **31**

Tax Evasion
Prevention **37**

Protection of
Assets **41**

Use of IT and
Electronic Communications **43**

Information
Management **47**

Disclosure and
Business Communications **59**

Personal Data
Privacy **61**

Conflict of
Interest **63**

Contents

Reporting and
Recording **65**

Visual
Branding **67**

Section 2

Professional Conduct
At Work Place **77**

Individual Conduct
At Work Place **65**

Section 3

Conduct while
At Sea **77**

Serious
Misconduct **81**

Section 4

Violations of
Code **86**

Section 1

Applicable to

All Synergy Personnel

- Ship personnel
- Office staff
- Contractors and consultants

1 Synergy Personnel Responsibility

- Read and comply with this **Code of conduct**
- **Understand the risks** in your role and how to manage them.
- **Seek advice** when things are not clear.
- Make sure that any third-party contractors, agents or consultants you work with are aware that they **are bound by our Code** and that they should act accordingly.
- **Speak up.** It is our duty to report any suspected violations of the Code.

Code of Conduct : Synergy Personal Responsibility



In any dilemma,
follow this self exercise

1

Am I authorized to do this ?

No > Seek Advice

Yes >

2

Have I analysed all the risk and are my actions setting an example ?

No > Seek Advice

Yes >

3

Are my actions in accordance with our core values ?

No > Reconsider

Yes >



Proceed with Confidence

2

ETHICS AND INTEGRITY

Company upholds the highest standards of ethics and integrity in all our operations, both onshore and offshore. Our commitment to ethical conduct is fundamental to our business practices and is essential in maintaining the trust of our stakeholders.

All employees, at all times, shall:

- a) act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct while working on the Company's premises, on Company's vessels, at offsite locations where the company business is being conducted, at Company sponsored business and social events, or any other place where the employee is representing the Company.
- b) maintain the highest standards of professional conduct, free from fraud and deception.
- c) remain independent and impartial in their professional duties, avoiding any activities that could compromise their objectivity.
- d) comply with applicable laws, regulations, and company policies. Any unethical behavior or legal violations are strictly prohibited.
- e) report any ethical concerns or violations

through appropriate channels. Transparency and accountability are key to addressing and resolving such issues.

- f) avoid any actions that could harm their reputation or that of the company
- g) follow the applicable safety norms
- h) not possess, consume or distribute prohibited drugs or substances whether at the workplace or otherwise
- i) not commit any act which is illegal or considered unethical or induce his/her colleagues and/or subordinated to do so
- j) not tolerate corruption or bribery in any form
- k) take appropriate measures to protect the company's assets and information and safeguard confidential information.
- l) Prohibit any act of theft, fraud, embezzlement, misappropriation, or any form of wrongful conversion of property belonging to the Company or another employee

3 Manager Responsibility

Manager: **Senior Officers on Vessels and Office Key Staff**

- Managers must **display visible compliance** in following code
- **Maintain an environment on board** where people are complying with company values and ethics.
- Create the atmosphere where **people always strive for the right approach** to achieve their objectives and feel confident about speaking up.
- Understand the Code violation risks and the procedures to mitigate them.
- **Forbid yourself from making gesture through which vessel can get the tacit acceptance** to take deviation from the core values and ethics.
- Be alert of any violations of the Code and encourage your team to **speak up if they know or suspect a violation.**



- Support team members who make good faith reports and ensure there is **no retaliation for escalating potential wrong doings.**
- **Ensure your staff understand the procedures they should follow to avoid violating the Code**, including recording gifts and hospitality and potential conflicts of interest in the Code of Conduct.
- **Briefing on requirement of code to new member of organization and advising them** for the support they have in meeting the conduct.

4 Health, Safety And Environment

Our aim is

zero

Injuries | Damages | Pollution



Organizational Requirement

- Each group company is expected to set suitable **targets for HSE improvement.**
- Appraise themselves with the progress and **report performance levels.**
- Incessant effort in **reducing the environment emission**
- Integration of technology in work system to **simplify the life of seafarer.**

Strive for continuous improvement to make **work environment safer.**

Individual Requirement

- **Adherence to Safety, Security and Drug & alcohol policy.**
.....
- **Complying** with set rules, standards, and procedures.
.....
- **Raise your voice** in unsafe or non-compliant situation.
.....
- **Report** accidents and injuries.
.....
- **Take actions** to identify hazards.
.....
- Establish mitigating measures to **minimize the effect of hazards.**
.....
- Set up action plan to **restore normalcy** in difficult scenarios.
.....
- Analyse the incidents to **identify the root cause** and learn from them.
.....
- **Always remain prepared** for extreme conditions.
.....
- **Improve the skills** of co-workers.
.....



Environment

Synergy understands the significant impact that marine transport can have on the environment and is fully committed to environmental protection and pollution prevention in all its activities, both ashore and at sea. As a signatory to the United Nations Global Compact (UNGC), we annually report our progress on environmental indicators to the UNGC.

Our efforts include:

- Achieving "zero pollution" onboard managed vessels and offices
- Efficient use of natural resources
- Minimizing waste and emissions
- Engaging in environmentally supportive supply and purchasing activities. Conducting fuel-efficient operations in line with customer expectations.

Each Employee should be open-minded about innovation and change. Managers are encouraged to listen to Employees' ideas about how to reduce resource consumption.

4 Labour Standards

- **Employment against payment**

Employment must be offered to competent and deserving candidates based on merit.

- The following are prohibited while obtaining employment:

- Withholding identity papers or work permits,
.....
- Requiring workers to deposit bond, money or any items of monetary value
.....
- Use of any other constraint

- **Prohibition of illegal, clandestine, and undeclared employment**

We shall comply with all applicable regulations to prevent illegal, clandestine, and undeclared employment. Established policies help us achieve the standards.



We create
**fair labor practices and a
positive work environment.**



We
respect and recognize
the right of workers.

- **Prohibition of child labor**

Involvement of individuals under the age of 18 for Synergy business is strictly prohibited. We must adhere to legal minimum age requirements of any nation where we operate in.

.....

- **Prohibition of forced labor**

Any use of forced labor, slavery, servitude, or trafficking of human beings is strictly prohibited. All Synergy personnel are entitled to accept or leave their employment freely. Our company will not require Synergy personnel to work to repay a debt owed to them or to a third party.

.....

- **Freedom of association**

Our company respects and recognizes the right of workers. They can negotiate collectively and create or join labor organizations of their choice without any sanction, discrimination, or harassment.



“Our ability to reach **unity in diversity** will be the beauty and test of our civilization.”

M.K. Gandhi

Equal Opportunity

We have **equal opportunity policy for everyone**. This helps us to ensure availability of best possible resources and adequate quantity of competent pool.

Sometimes people can breach equal opportunity policies without even realizing it. For example, if they are unconsciously biased towards recruiting people similar to themselves. Therefore, employment related decisions must be based on objectives and geographic legislations and should not be

taken under the influence of personal feelings, prejudices ,and preferences of the employer.

- **Employment decisions** which include hiring, evaluation, promotion, training, development, discipline, compensation, and termination **must be based solely on objective factors, including merit, qualifications, performance, and business considerations.**

- **Diversity** has its own value and advantages. **Discrimination** based on race, colour, religion, age, gender, sexual orientation, gender identity, marital status, disability, ethnic origin, or nationality **is intolerable.**



5 Engagement of Third Parties

Our company **respects international human rights standards and frameworks**. We work to ensure that we do not infringe on fundamental human rights through our operations, services, or business relationships. We believe every synergy personnel should be treated with trust, respect, and courtesy. Our company is committed to foster fair and safe work environment. We respect all rights and ensure everyone achieves their full potential.

Also, Synergy staff will collaborate with contractors and suppliers who are **economically, environmentally, and socially responsible**. Service provider found involved in any human right violation directly or indirectly must be barred from future services.

- **Contractors and suppliers will be selected based on initial background and security screening** according to company standards. This initial check will be followed by periodic audits for assurance.
- **Engagement will have a written and signed contract** explaining the service being provided for legitimate business .

6 Anti Corruption Policy

Policy Statement

Synergy personnel will not involve in any form of corruption either directly or indirectly.

Synergy personnel must decline any opportunity which would place our ethical principles and reputation at risk even if it may result in the Company losing business or otherwise suffering a disadvantage.

Turning a blind eye to suspicions of bribery, corruption or money laundering can result in liability for Synergy and for individuals.

This policy is applicable for all business activities and collaboration with government authorities, independent organization, commercial enterprises, or any private service providers.



Everybody has the **responsibility** to report a corrupt behaviour.

Policy Understanding and Compliance

Corruption

Dishonest behaviour by those in positions of power for business or personal gain. It can include giving or accepting bribes or inappropriate gifts, double-dealing, under- the-table transactions, manipulating elections, diverting funds and laundering money.

Bribery

A bribe is an illegal, unethical gift or lobbying effort bestowed to influence the recipient's conduct. Bribery is performed through giving, offering, soliciting, or receiving (or attempting to give, offer, solicit, or receive) any item of value to influence the actions or behaviour for the purpose to obtain commercial advantage.

Bribery can take a variety of forms and may include common business practices or social activities, such as providing gifts, entertainment, travel, and hospitality.

Prohibited for Synergy Personnel

- **Giving or receiving cash or cash equivalent** gift certificates/cards, stock and personal property to support synergy business .
.....
- **Forgiveness of a debt** without proper authorization.
.....
- **Charitable contributions**—if made to a charity at the direct request of a government official or private business partner, it could be considered an indirect bribe made to obtain or retain business or to secure other improper business advantage.
.....
- **Job offers or internship awards**—offers to Government Officials (or their relatives) can present a risk of violating anti-bribery or anticorruption laws and regulations. Compliance must be consulted prior to making such offers .

Gifts, Hospitality and Entertainment

Gifts : Items of value or benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return.

Hospitality and Entertainment : Facilitation of services for individual or team recreation.

Expectations for Synergy Personnel

- Acceptance of gifts, hospitality, or any form of entertainment facilitation from service providers or third parties is prohibited except **acceptance** of small promotional corporate gifts and hospitality
.....
- Providing gifts, hospitality ,and entertainment to third parties or individuals within our organization **must be proportionate to the occasion.**
.....
- All gifts, hospitality, travel ,and entertainment **must be given openly and transparently.** Document records to be maintained.
.....
- **Director permission** is necessary for such facilitation.

Facilitation Payment

Facilitating payments are the ones made to public, organizations or government officials with the intention of expediting an administrative process and to benefit the party making the payment.

Guidance for Synergy Personnel

- Synergy personnel shall make their full effort to **decline any request by authority** to make facilitation payment.
.....
- However, if synergy personnel faces difficulty in handling situation ,**they should immediately contact Line Manager for consultation .**
.....
- Facilitation payment must not be made except in unavoidable circumstances (under immediate threat to health or safety).

Extortion

Practice of obtaining something, especially money, through force or threats. This is generally practiced in form of threatening to penalize for noncompliance of local regulations.

Guidance for Synergy Personnel

- **Seek help** from agent or local authority.
.....
- Synergy personnel should make their full effort to **decline the request by authority** unless there is imminent danger to health or safety of synergy personnel.
.....
- However, if synergy personnel faces difficulty in handling situation, they should **immediately contact Line Manager** for consultation.

Double Dealing

Practice of pretending to act in a manner when intention is to act contrary. This is dishonest behaviour for the purpose of deceiving the partner.

Guidance for Synergy Personnel

- Synergy personnel **should not indulge themselves in double dealing** for business activities and professional conduct .
.....
- External parties that are discovered to be involved in double dealings **should be blacklisted for business activities and future engagements.**

Money laundering

Money laundering is the illegal process of making money generated by a criminal activity, such as drug trafficking or terrorist funding etc. This can also be explained as business involvement that has financial ties to organized crime.

Guidance for Synergy Personnel

- Synergy personnel are prohibited to make business agreements **with parties having known criminal backgrounds.**
.....
- **No Synergy personnel should be involved** in or facilitate money laundering by extortion or drug trafficking



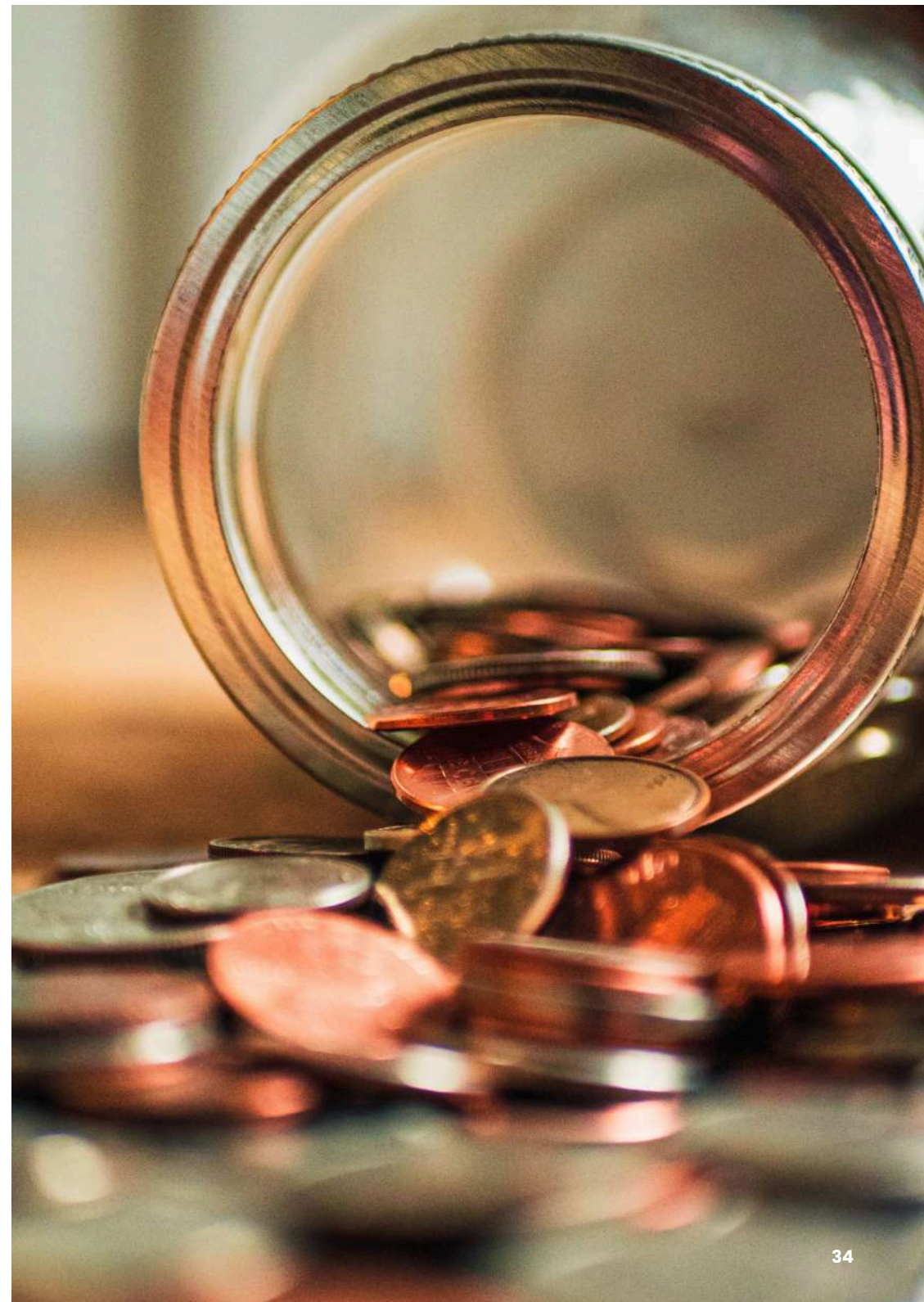
Synergy is a member of 'Maritime Anti corruption network'. Hence, we are committed to stop economic destabilization and spreading of poverty by curbing corruption.

Diverting funds

Misutilization of funds for which loan was not sanctioned. As employees of Synergy you may be required to handle Company funds.

Guidance for Synergy Personnel

- **The funds of the company must be spent for official purposes only.** Supporting documents such as bills, invoices or receipt need to be preserved for proof.
- **Never intentionally falsify a financial record** or misrepresent the facts of a transaction.
- **Synergy will view very seriously any attempts to falsify expense claims of any nature** including conveyance, travel and entertainment
- **Employees are required to settle their travel expense claims** as per travel policy norms.

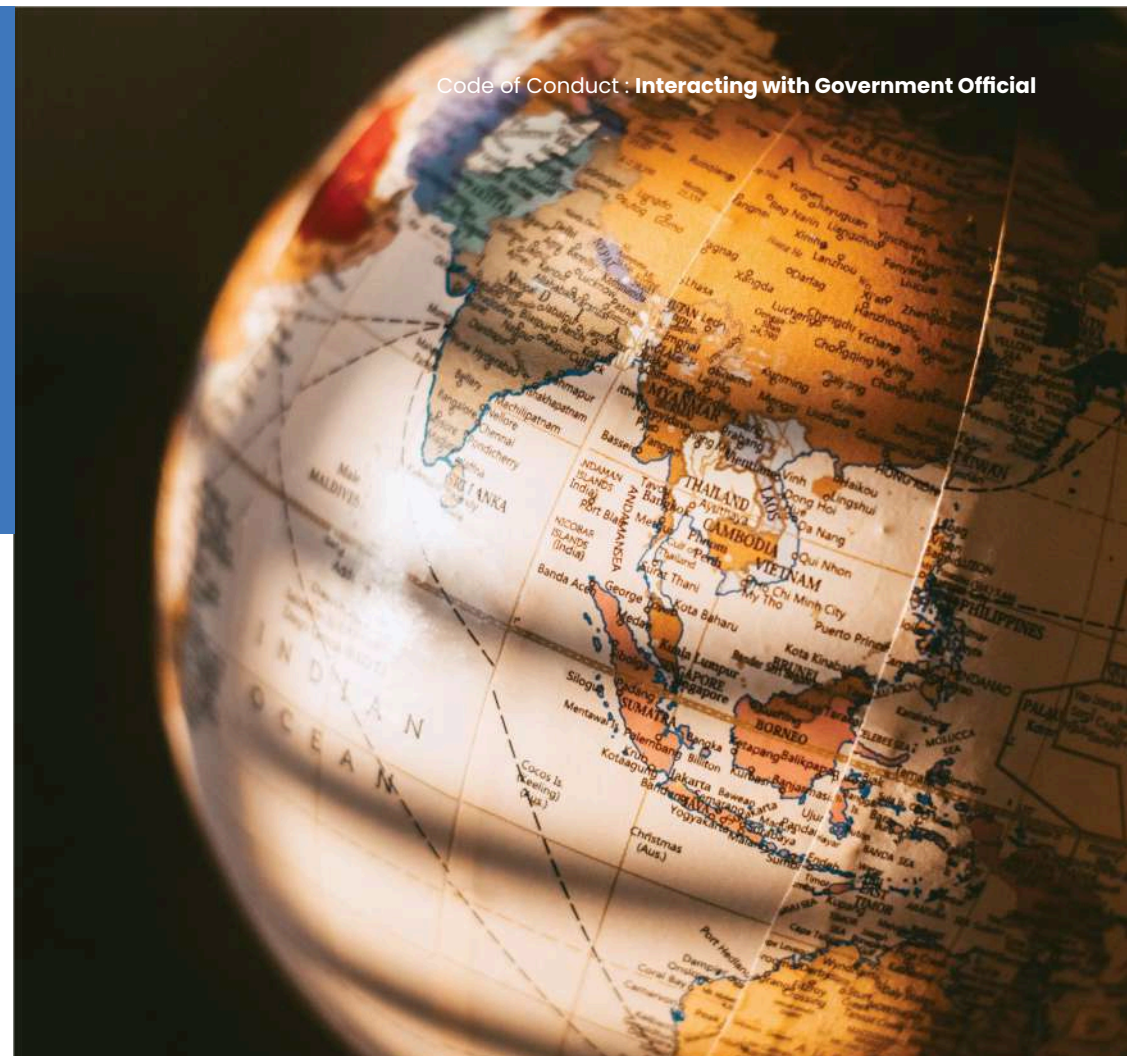


7 Interacting with Government Official

Synergy promotes transparent and lawful interaction with government officials.

To encourage such lawful interactions, Synergy personnel must:

- **Ensure that they know the rules of the country in which they are operating and act in compliance with local rules.** This includes tender negotiations as well as entering into a contract with them.
- **Never accept, give, or promise anything that could be interpreted as intending to improperly influence a governmental decision.**
- **Synergy personnel must not use third parties,** for example agents, consultants, or brokers, to do what is not permitted to do ourselves.



Government Official: Person acting in an official capacity or on behalf of government entity, political office and representation of public international organization.

8 TAX Evasion Prevention

The Company is committed to full compliance with all applicable tax laws and regulations in every jurisdiction in which we operate. We maintain a zero-tolerance approach to tax evasion, the facilitation of tax evasion, and any activity that seeks to conceal or misrepresent financial information for unlawful tax advantage.

All employees, contractors, agents, and business partners must:

- Ensure accuracy and transparency in all financial records, invoices, and transactions.
- Never engage in practices that deliberately misstate, conceal, or manipulate information to evade taxes or assist others in doing so.
- Report any concerns or suspected violations of tax laws immediately through the Company's reporting channels.
- Conduct due diligence when dealing with third parties to ensure they do not engage in or expect the Company to participate in tax-evasive activities.
- Seek guidance from the Finance or Compliance Department when uncertain about tax-related



Code of Conduct :Tax Evasion Preventio0n

"Tax evasion is a crime; tax compliance is a contribution to society."

Every Synergy Personnel is expected to **treat others with respect** and avoid situations that maybe perceived as inappropriate.

9 Harassment and Bullying

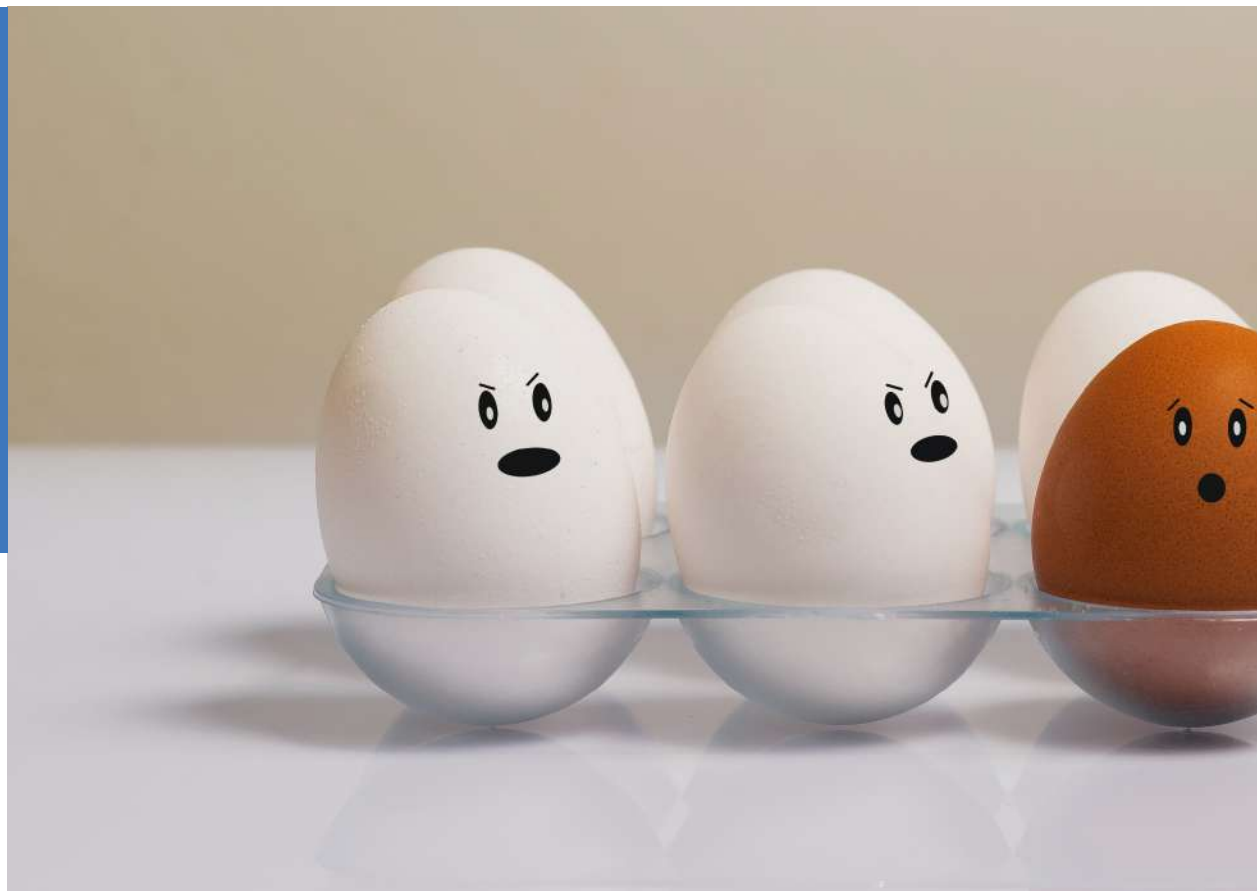
- Feedback, criticism and challenge must always be delivered in an appropriate and respectful manner. Power must not be mis utilised for making intrusion into employee personal life.
- **In particular, be aware of cultural sensitivities** – what is acceptable in one culture may not be in another. It is important to be aware of and understand these differences.

It is the responsibility of each individual to challenge someone if his/her behaviour is hostile, intimidating, humiliating or disrespectful.

Below mentioned is the understanding of the behaviours that falls under category of

Harassment.

- **Discriminatory remarks** on the basis of sex, hierarchy, religion, physical disability, nationality, or age
- **Making inappropriate jokes** or comments
- **Displaying offensive or improper content**
- **Physically or verbally intimidate** or humiliate others
- **Sharing objectionable material** through emails, text, or social media
- **Unwelcome attention** such as spying, stalking, pestering, overly familiar behaviour or unwelcome verbal or physical attention.



Harassment in any form such as action, conduct or behaviour which is humiliating, intimidating or hostile will not be tolerated and are strictly prohibited.

Sexual Harassment refers to any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.

It is also harassment when submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting said individual.

When conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment; it is also considered harassment.



“Speak your mind,
even if your voice shakes.”

Unwelcome behaviour is the critical word. Unwelcome does not mean "involuntary." A victim may consent or agree to certain conduct and actively participate in it even though it is offensive and objectionable. **Therefore, sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome.** Whether the person in fact welcomed a request for a date, sex-oriented comment, or joke depends on all the circumstances.

Sexual harassment may include following

- Use of **offensive / obscene** language.
.....
- **Making obscene calls** or sending/forwarding obscene mails .
.....
- Making passes/advances/comments **on dressing of co-employee's physical appearance** in the office.
.....
- **Physical contact** like touching or patting customers or co-workers.
.....
- **Misuse of one's position/authority** in office to ask or demand for sexual favours.
.....
- **Display of obscene pictures** and posters at the workplace.
.....
- **Showing sign of over-friendliness** with the co-workers, if it is unwelcome



“Our lives begin to end the day we become silent about the things that matter.”

Martin Luther King

Bullying is a form of harassment that includes hostile or vindictive behaviour, which can cause the recipient to feel threatened or intimidated. Bullying may involve a misuse of power or position and is often persistent and unpredictable.



- Personal insult through following may be considered as examples of bullying:

- **Belittling or ridiculing a person**, or his/her abilities, either in private or in front of others.
- **Sudden rages or displays of temper** against an individual or group, often for trivial reasons.
- **Subjecting someone to unnecessary excessive or oppressive supervision**, monitoring everything, they do or being excessively critical of minor things.
- **Persistent or unjustified criticism.**
- **Setting menial or demeaning tasks** that are inappropriate to the job or taking away areas of responsibility from an individual for no justifiable reason.

- **Making threats or inappropriate comments** about career prospects, job security or performance appraisal reports.

- Cyber bullying includes inappropriate:

- **Suggestive and unwanted remarks.**
- **Graphics or threat-centered, abusive emails.**
- **Postings on social networks.**
- **Text messages.**

10 Protection of Assets

Everyone is personally responsible for safeguarding and using company assets appropriately.

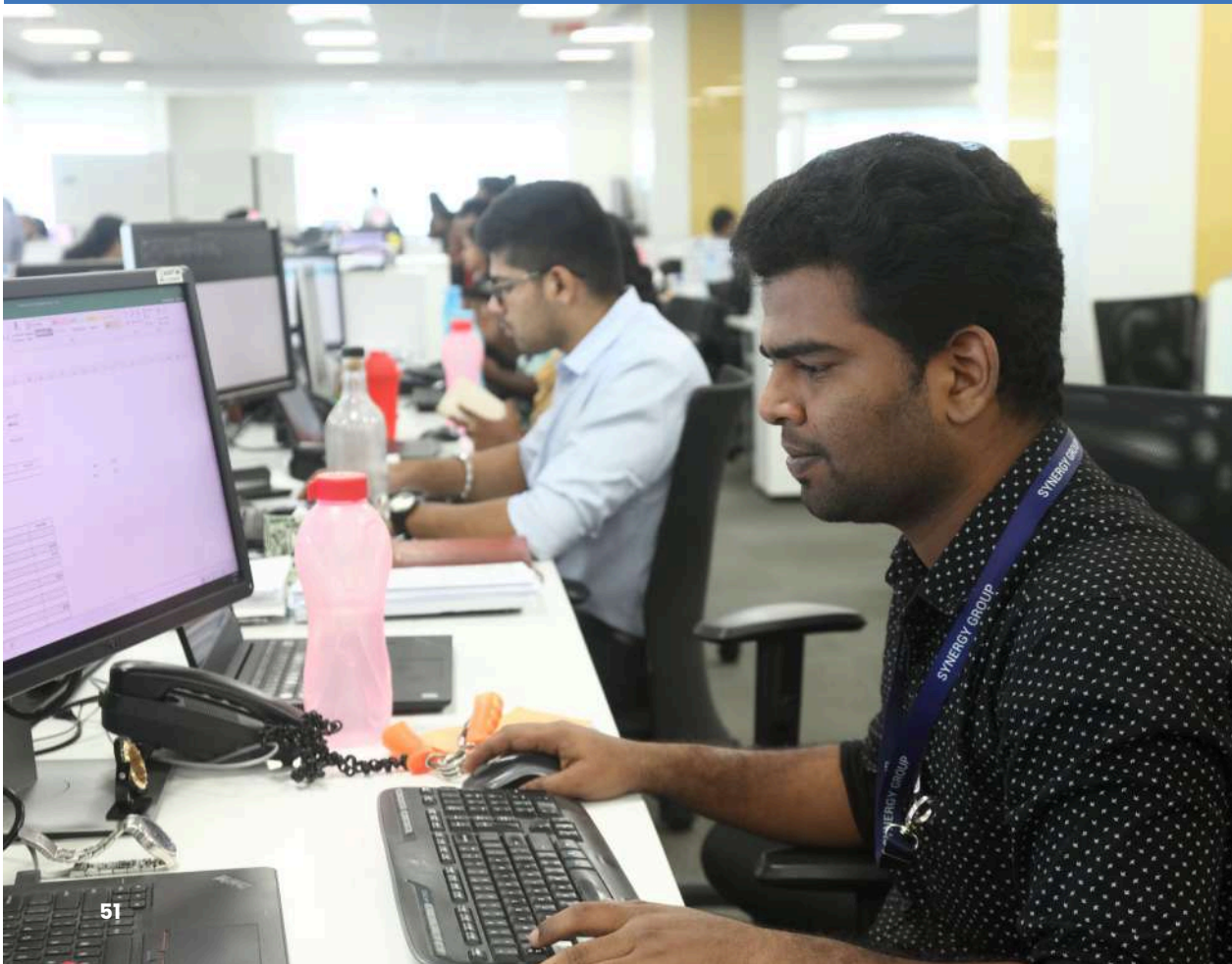
Employees are expected to take all preventive measures to avoid waste, loss, damage, abuse, fraud, theft, misappropriation, infringements and other forms of misuse of assets.

- **Be complete and accurate** when reporting assets, liabilities, revenues, and expenses.
- **Employees should protect company assets given to them.** Also, they must play their role in protecting shared assets against misuse, lost or theft.
- **Report if someone is putting company assets at risk** or using them inappropriately.
- **Respect assets of other employees.**



11 Use of IT and Electronic Communications

- **Sharing of IT equipment and company software login details** is not permitted to unauthorized users.
- **Unapproved modification or disabling of security setting / configuration of IT equipment** which result in deviation from company IT procedure, is not permitted.
- **Company IT equipment must not be used to access, store, send or post** pornography, indecent and offensive materials.
- **You must only use approved internet-based services** to store, process or share business information.
- **Online gambling and conduct of unlawful activities are forbidden** on company IT equipment.
- **Synergy name or brand** shall not be used in personal emails.
- **Employees should restrict their personal usage of the company's Internet and e-mail facilities** as well as automation facilities available to them.
- **Personal use of company supplied IT equipment must be kept limited, occasional, and brief.**

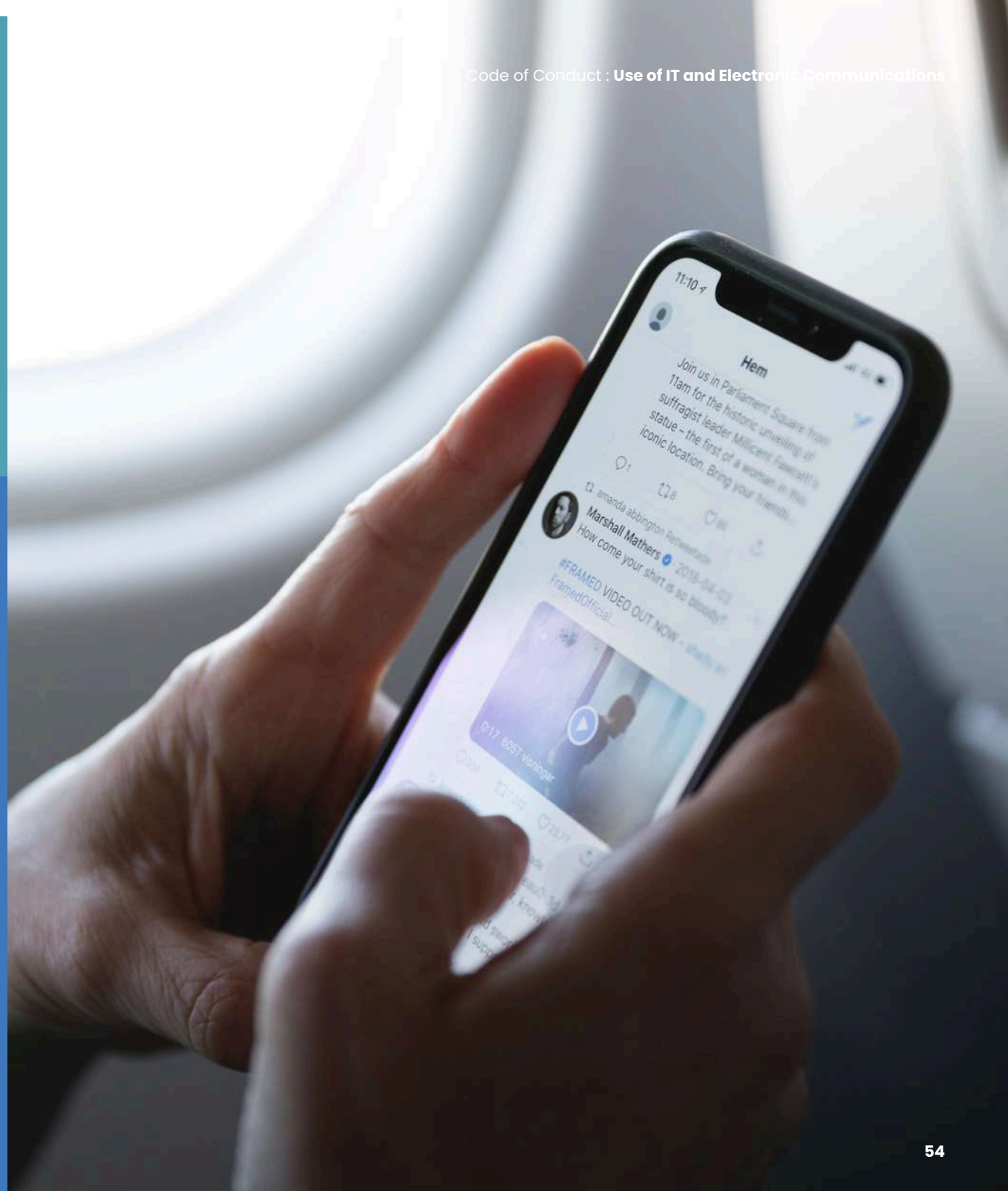


- **Use of personal electronic equipment such as mobile or music system** which can distract the individual from carrying out his duties effectively, **are prohibited in workplace.**

- **Use of electronic equipment is barred in the work area** where they present serious safety risk.

- For cyber security all official **IT equipment must be maintained as mentioned in ISMS manual.**

- In case of any threat to cyber security, '**company information security officer**' of the company has to be contacted immediately.



12 Information Management

- **Employees should assess the risks associated with any information handling** so that they can protect the distribution of information to unauthorized personnel.
.....
- **When anybody creates or receives information, they must assign it a confidentiality classification** and only share it with those who are entitled and permitted to receive it.
.....
- **While working with third parties, employees must consider their authorization** to share information with others.
.....
- **Appropriate disclaimers** must be used, especially when the **communication contains forward-looking information**.



When anybody creates or receives information, they must assign it a **confidentiality classification**.

- **Synergy personnel are not to publish, post or release any company information on social media without proper clearance.** If there are questions about what is considered confidential, employees should check with their supervisor.

- All communications made directly to public either by print media or social media on behalf of Synergy **must be cleared by highest management authority** in consultation with media coordinator and legal team.

- **Social media use shouldn't interfere with employee's responsibilities** or any area of duty.

- **Use of personal social media for business purposes is strictly prohibited.**

- Employees may be invited to speak in professional forums or participate in conferences, seminars, and on-line chats or write in professional magazines. **Under all such circumstances, employees must ensure that participation is with prior written approval from the Senior Management of the Company.**

- Employees must **not engage with the media on behalf of Synergy** without disclosure clearance from Media relation team.

- Every communication to the public on behalf of Synergy **must be accurate in all material respects, complete, relevant, balanced and in compliance with all applicable laws and regulations.**

13 Disclosure and Business Communications

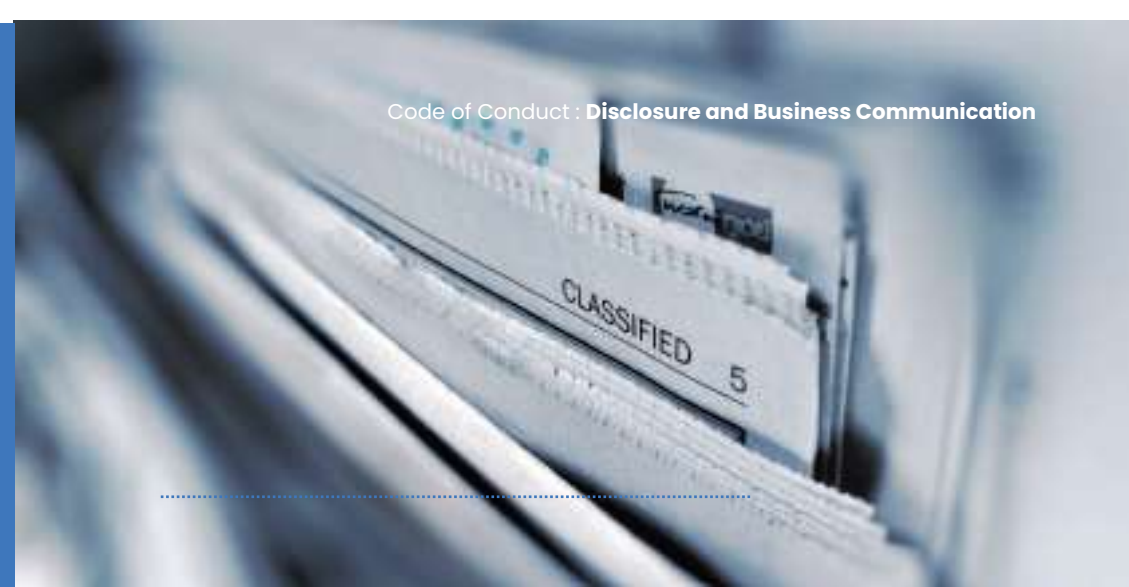
Synergy will share information relating to its performance, customers, outcomes of meetings and discussions with employees at various levels on a 'need to know' basis.

In other words, information will be shared depending on the need for a person to use this information to do his/her job. Before disseminating any information to colleagues/outsiders every employee is expected to apply the same judgment on whether they '**need to know**'.

- **Employees must not disclose information about business activities** unless they are professionally capable and authorized to do so.

- **Employees must not engage in casual conversation on sensitive or confidential matters** with individuals who are not a part of that project.

- **Employees are prohibited from entering into any kind of personal business contracts** with Synergy partners, business affiliates and companies.



- **Employees should not send communication containing confidential information** of any project outside their working group .
- **Only Synergy-approved social media channels are to be used for official business**, provided user is approved and have received the required training.
- **Use of personal social media** accounts for disclosing confidential business information or other business program is **strictly forbidden**
- Individual using personal account on social media to discuss company matters should **use disclaimer** that **content shared by them is totally based on personal ideology and understanding.**

14 Personal Data Privacy

Personal data is broadly defined as any information relating to an identified or identifiable individual such as name and contact details. **More private information, such as race or ethnic origin, health data, sexual orientation, criminal behaviour etc is sensitive personal data and subject to more stringent requirements.**

Data should be protected from inappropriate access or misuse. When it is to be transferred to third parties, it must be appropriately safeguarded. If we do not comply with these requirements, we risk causing harm to individuals and could face fines or litigation.

- All customer and employee **personal information is confidential** and may not be disclosed except as permitted by law and applicable regulations
- **Identify the privacy risks** before collecting, using, retaining ,or disclosing personal data for any official purpose.



- **Limit the processing of personal data** for specific, defined, legitimate purposes only.
- When you process or share individual's personal data within organization or to third party, you must always inform them.
- Personal data in possession must **be kept up to date and disposed off when no longer required.**

15 Conflict of Interest

A Conflict-of-Interest could be defined as a “situation that arises when a decision-making authority is seen to have a personal stake in the outcome of the decision itself”.

Employees may find themselves in situations that are of the nature of creating a Conflict of Interest. **If in doubt, it is best to consult the immediate supervisor / manager concerned before taking any decisions in such cases.**

Code of Conduct : **Conflict of Interest**

- **Participating in outside activities** for enhancing talents and abilities outside jobs should be **lawful and free of conflicts with their responsibilities as employees of Synergy**.
- Employees are not permitted to set up **part-time businesses** or take up **part-time employment** in any area as these will hinder their performance and clearly place them in a conflict of interest situation. **Only exception is a teaching assignment with Senior Management 's permission.**
- Employees pursuing such activities should ensure that
 - The purpose should be to give expression to talent and stay in touch with one's hobbies **and not for the motive of making money.**
 - Employees should not solicit opportunities from customers using their relationships. **This should not be done during company time or should not interfere with work.**
 - Permission must always be obtained **in writing prior to participating in such activities**

16 Reporting and Recording

Truthful Reporting

- **Report issues, actions to address them, transparently & accurately** in accordance with applicable Company policies and standards.
- **Employees should not falsify or delay information gathering** during an investigation or enquiry.
- **Never alter the truth or conceal information**, whether on behalf of the company or for personal gain



Records Management

- **Write clearly, professionally and accurately** in all documents (e.g., emails, texts, memos, reports and financial statements).
- **Take responsibility for the integrity of records** you create and manage. Retain them in compliance with records retention schedules and our policy.
- **Employees must not unlawfully conceal, alter or destroy documents.**
- Do not **destroy or alter any records** that are covered by a “legal hold” initiated by the legal division.

17 Visual Branding

Synergy staff must use brand logo and trademarks appropriately.

- **Any alteration in colour, aspect of the logo or tag lines** is not allowed.
- **Template of the official background** shall strictly follow the visual style guidelines of the company.
- **Superimposing of brandmark over photocopy** is not allowed.
- **Any content with the brandmark has legal implications**, so, their use shall be limited to official purposes only.



Section 2

Applicable to all
Synergy Office Personnel

- **Office Staff**

- **Contractors and consultants**

18 Professional Conduct At Workplace

Following will be considered serious misconduct at workplace and will result in disciplinary actions.

- **Absence from work** without informing your supervisor in charge.
.....
- **Habitual absence** without applying for or securing sanctioned leave, absence without leave for more than seven consecutive days, overstaying the sanctioned leave without sufficient grounds /satisfactory explanation.
.....
- **Willful slowing down of work** or abetment or instigation thereof.
.....
- **Theft, fraud, or dishonesty** in connection with company's property or business.
.....
- **Refusal or failure to comply with Company's instruction** to work in shifts and in other sections or divisions or any other place of business of the company when so transferred or required to do so.



- **Changing working place** without orders or wandering away from assigned place of duty during working hours.
.....
- **Willful insubordination** (including refusal or failure to perform work assigned) or disobedience whether in combination with another by reasonable orders of a supervisor
.....
- **Refusal to accept a charge sheet, warning, memorandum,** or any other communication issued by the management.

19 Individual Conduct At Workplace

Code of Conduct : **Individual Conduct At Workplace**

Below mention **conducts are intolerable at workplaces**

- **Assaulting** colleagues at or away from workplace.
.....
- Any **act of violence** at workplace.
.....
- **Unauthorized possession** of any lethal weapon in the company premises.
.....
- **Fighting or attempting bodily injury** to another employee of the company.
.....
- **Use of profane or abusive language** to a supervisor or a fellow employee.
.....
- **Exhibiting intimate relationship** with colleague within work premises

A close personal relationship is defined as a relationship between individuals who have a continuing relationship of a romantic or intimate nature.

- Discouragement of close personal relationships: Our company **discourages close personal relationships*** at workplace or with partners and beneficiaries of our programs

Section 3

Applicable to all
Synergy Ship Personnel

- **Ship personnel**

- **Contractors and consultants**

20 **Conduct While at Sea**

For Seafarer and Contractor



Punctuality

Punctuality is very important both for the efficient operation of the ship and to avoid putting extra work on others. This is true for joining the vessel at the time appointed, returning from shore leave, reporting for watch-keeping duty and all other work. Absence at the time of sailing, may seriously delay the ship or even prevent her sailing until a replacement is found

Duties

Every seafarer should **carry out their duties efficiently to the best of their ability.** Seafarers have the right to be told clearly what their duties are and to whom they are answerable for carrying them out. If in doubt, they should ask. Seafarers must also **obey reasonable commands and instructions.**

Treatment of accommodation

The ship is both a seafarer's place of work and home. Therefore, both shared facilities and accommodation should be used appropriately with consideration for others.

Behaviour towards others

A person's anti-social behaviour can be a nuisance to others on board. In extreme circumstances, it can also place the ship and the crew at risk. Such behaviour includes but is not limited to excessive noise, abusive language, harassment, bullying, aggressive attitudes and offensive personal habits.

Seafarers should also be considerate towards those who need to sleep whilst others are awake.

Conduct during emergencies.

During any emergency or situation in which the safety of the ship, or any person on board or the marine environment is at stake. **The Master, Officers and Petty Officers are entitled to look for immediate and unquestioning obedience of orders.** There can be no exceptions to this rule. Failure to comply will be treated as among the most serious of breaches of discipline

“ Our attitude towards others determines their attitude towards us. ”

Earl Nightingale



21

Serious Misconduct

The Company considers the following to be **serious acts of misconduct** to have been committed, that may lead to dismissal from the ship if proved, to the reasonable satisfaction of the Master:

All requirements mentioned in Section 1 of this code of conduct

- **Assault**
.....
- **Theft** or possession of stolen property.
.....
- **Unauthorized possession of weapons** or explosives.
.....
- **Persistent or willful failure** to perform duty.
.....
- **Willful damage to the ship** or any property on board, or unauthorised disposal of Ship's property for personal gain.

- **Conspiring with others at sea** to impede the progress of the voyage or navigation of the ship.
.....
- **To be asleep on duty** or failure to remain on duty if such conduct would prejudice the safety of the ship or any person on board.
.....
- **Failure to report to work without satisfactory reason** or absence from place of duty or from the ship without leave.
.....
- **Intimidation, coercion, and/or interference** with the work of other employees.
.....
- **Behaviour that seriously detracts** from the safe and/or efficient working of the ship.
.....
- **Causing or permitting unauthorized persons** to be on board the ship whilst at sea.
.....
- **Repeated acts of misconduct of a lesser degree** after one or more warnings have been issued.
.....
- **Abetting or conniving with others to smuggle** or mis-declaration of, or failure to declare articles leading to seizure and/or fine to the vessel.
.....
- **Desertion** or assisting others to desert.
.....
- **Being left behind** by the vessel.

Section 4

Actions against **violation of code** by

- Ship personnel
- Office staff
- Contractors and consultants

Synergy will not retaliate against anyone who makes a good faith report of a possible violation.

Violation of Code

Synergy personnel are reiterated on their obligation to report any violation of company policy.

The confidentiality of anyone reporting a violation of any company policy will be maintained as much as possible. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.

Violations of any magnitude in compliance with above policies will result in disciplinary action as per the just culture and may result in dismissal from organization or legal action against the convicted party.



INSPIRE. INNOVATE. DELIVER.
