



HUMAN RIGHTS AT SEA

CODE OF CONDUCT FOR IMPLEMENTING PARTNERS AND CONSULTANTS

Date Adopted: August 2020

Renewed: October 2025

Policy Statement

The Code applies to implementing partners and consultants ('partners') contracted with Human Rights at Sea (HRAS) CIC, regardless of location. In accepting an agreement with Human Rights at Sea (HRAS) CIC, you/your organisation undertakes to discharge duties and to regulate conduct in-line with the requirements of this Code for all work relevant to contracts with HRAS. Breach of this Code may result in the termination of our contract/agreement with you/your organisation and, in some cases, may lead to criminal prosecution. Whilst recognising that local laws and cultures differ considerably from one country to another, HRAS is an international organisation and therefore the Code of Conduct is based on International and UN standards. The Code reflects HRAS's fundamental mission and its values.

Prohibited Sectors and Practices

HRAS will not knowingly enter partnership with organisations from specific industries or that engage in practices which HRAS believes fundamentally undermine HRAS's mission and values. All contracts with partners will require partners to confirm that they do not fall within the prohibited categories as set out in the Partnerships Policy.

Human Rights

Partners are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements, and existing policies. HRAS will not tolerate anyone with the delivery of its work carrying out any form human rights abuse. This includes but is not limited to modern slavery, human trafficking, sexual exploitation, harassment, discrimination, or abuse of labour rights. Please see the definitions section with HRAS's Human Rights policy for the above terms as needed.

Partners must not engage in the following activities in their professional and personal lives:

- Sexual activity with anyone under the age of 18.
- Sexually abuse, harass, or exploit anyone (Please see 'definitions' in the Human Rights Policy)
- Engage in any sexual relationships with beneficiaries since they are based on inherently

unequal power dynamics.



HUMAN RIGHTS AT SEA

- Cause or contribute to forced labour, bonded labour, trafficking in persons, child marriage, domestic servitude, descent-based slavery, and child slavery. (Please see 'definitions' in the Human Rights Policy).

Where a partner finds human rights abuses in its operations, HRAS will not tolerate inaction on this issue.

Anti-Corruption

Human Rights at Sea takes a zero-tolerance approach to bribery and corruption with its partners.

Facilitation payments

HRAS does not tolerate facilitation payments of any kind or unofficial payments made in return for a business favour or advantage. All payments made on behalf of the organisation must be for goods and services received and with clear supporting documentation e.g. contract, purchase orders and invoices.

Conflict of interest

All partner conflicts of interest must be declared at the earliest opportunity in writing to HRAS along with steps to manage the conflict in line with the law.

Gifts and hospitality

Gifts, entertainment, hospitality, or other promotional expenditures, given and received, to or from third parties must be proportionate, transparent, reasonable and for bona fide purposes related to the aims and objective of the organisation.

Political contributions

Donations, whether in cash or kind, in support of any political parties or candidates, campaigns or political issues, are prohibited as this can be perceived as an attempt to gain an improper business advantage.

Voluntary and Charitable contributions

Voluntary or charitable support and donations are acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. However, partners must be careful to ensure that voluntary or charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. All charitable contributions should be publicly disclosed.

Further details on HRAS's approach to anti-corruption are found in its policy.



HUMAN RIGHTS AT SEA

Research Ethics

All partners conducting research must follow the guidance and standards set out in the Research Ethics policy.

Whistleblowing

Partners have a responsibility to be watchful for illegal or unethical conduct and to inform HRAS of any legitimate concerns about any aspect of work of the organisation, including its employees and partners. Please refer to the Whistleblowing and Complaints policy for detailed guidance.

ENDS.