

ON PROGRESS

Year 2022

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Statement of reporting and support by ES-KO Chief Executive Officer

To our stakeholders

The ES-KO Group Ltd and its operating subsidiary, ES-KO International S.A.M., has always aligned with the best practice principles of the United Nations Global Compact in the areas of human rights, labour laws, caring for the environment, and anti-corruption protocols, and we reaffirm our support for the Ten Principles.

ES-KO continues to advocate and make progress in our ongoing commitment to the key initiatives and, in this fourth annual Communication on Progress, we describe the progress we are making in achieving those principles.

ES-KO has worked diligently throughout the COVID-19 pandemic to provide a secure and ethical working environment with transparent communication channels for our employees, wherever they are located. Additionally, and reflecting ES-KO's commitment, we



have appointed as Sustainability Ambassador a member of the shareholder family.

We understand that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our progress to implement the Ten Principles.

Our governing Boards and I are wholly committed to the continuation of the Global Compact and its principles as a core discipline within the strategy, culture and day-to-day operations of our company.

We support public accountability and transparency, and will continue to report on progress annually, according to the Global Compact COP policy.

Sincerely yours,

Roger Philip Smith
ES-KO Group CEO



A short introduction about us

The evolution of ES-KO over the last 67 years have been achieved with great effort, resulting in ES-KO being recognized in the market as a company conducting business ethically, and demonstrating professional insight, expertise, hard work, quality orientation, and focus upon sustainable service excellence.

Who we are

Founded in 1955 and headquartered in Monaco, ES-KO International S.A.M. is an internationally renowned integrated logistical support group. It operates in remote and challenging locations, often with inadequate or non-existent infrastructures, to provide rapid and effective solutions, in support of global peacekeeping, humanitarian aid and commercial operations.

ES-KO, which has operated throughout Africa in the last six decades, has clients in the oil & gas sector together with governmental and military entities. ES-KO has worked with the United Nations since 1955 servicing 26 missions, mainly in Africa.

Our Group

The companies that form the ES-KO Group Limited are ES-KO, Navitrans, Black Bull, Ebrex Cruise Services and EFS Ebrex. The Group is family owned and aims to be the provider of choice for logistics and freight solutions, specialised food and marine services, and life infrastructure construction. Our expanded range of services include risk management. The group provides turnkey and tailor-made services to support customers in difficult and remote locations.

The ES-KO Group delivers high value, innovative, and world-class solutions that earn the loyalty of customers, while remaining mindful of its responsibilities to the environment, local communities, and sustainability.



Our Core Values

VISION:

To build a resilient business with a portfolio of customers across diverse sectors that can be developed within the ES-KO Group based upon operating knowhow and exceptional customer service.

INTEGRITY:

We will maintain our reputation for integrity and transparency and sustain an ethical work environment for all our employees.

QUALITY:

We are committed to providing high quality services and products.
We meet the mutually agreed requirements the first time and strive for continuous improvement of our work processes.

INNOVATION & SUSTAINABILITY:

These are at the heart of our business.
We believe that companies of the future are those that use business as a force for good.

SAFETY:

As a leading provider of high-value technical and management solutions, we are firmly committed to maintaining a safe and healthy environment in all our offices and projects.

Our services



PROCUREMENT
& LOGISTICS



CAMP SERVICES



CONSTRUCTION



LEISURE CATERING

ES-KO operates worldwide, and primarily in Africa, to provide fast and efficient logistical solutions (primarily for food-related projects), facility management (mainly catering and soft services) and camp construction, in support of global peacekeeping, humanitarian and commercial operations.

ES-KO also has clients in the oil and gas sector and works with government and military entities.

Our modern capabilities blended with depth of experience provides operational support so our clients can concentrate on their core business and accomplish their daily missions.

ES-KO's experience is built upon a history of delivering services and products in remote, difficult locations.

Our knowledge in procurement, contract and programme management means we operate as a value-added partner with competitively priced and quality services delivered by experienced team members through best practices in quality assurance, health and safety, and risk management.

Christophe Guillemin

Board member
In charge of CSR Policy



"As soon as ES-KO joined the Global Compact in 2018, I was entrusted within the ES-KO SAM Board of Directors by the Chairman of the ES-KO Group - himself fully committed to the 10 principles - to promote and coordinate actions in this area.

Five years on, I am particularly pleased to say that ES-KO, a family business of more than 60 years, has always respected the essence of the Global Compact principles. Indeed, ES-KO's ethics of conduct, vision and methods have always been in line with the spirit of the Global Compact since its creation. However, thanks to the framework defined by the United Nations Global Compact and the adhesion of everyone within ES-KO, it has allowed us to structure our actions, to express them clearly and, beyond that, to reveal to all the personnel their existence and virtues, but also the margins for progress. The exceptional motivation and permanence of the team formed to carry out the annual COP, have of course been a determining factor, as this COP 2022 clearly shows.

I warmly thank the team as I welcome the recent appointment of a Sustainability Ambassador - Elena Zanotti. Her involvement, youth and enthusiasm are the best guarantees of the continuity of ES-KO's commitment to the Global Compact. As shown by this COP, we are constantly improving our working practices and introducing innovative solutions that enable sustainable growth.

ES-KO is not all about business, we are also about community and caring for the people around us, with special attention to those located in remote and difficult areas where our policies often go far beyond the local standards and regulations."



HUMAN RIGHTS PRINCIPLES

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2:

Make sure that they are not complicit in human rights abuses.

Assessment, policy and goals

ES-KO's activities providing logistics support services around the globe bring us into contact with a diverse range of cultures making it especially important for us to provide leadership in human rights within the organization and externally towards suppliers and service providers with whom we work.

Our Integrated Management System Policy (IMSP) reflects the principles expressed in the Universal Declaration of Human Rights to which we unreservedly subscribe. We believe these principles are fundamental to our success, as respect for them makes ES-KO a better employer and encourages every ES-KO employee to be better. ES-KO's employees are our image with our customers every day.

ES-KO's IMSP aims to:

- Express commitment to meet the mandatory requirements and adhere to the voluntary standards; and
- clearly define the objectives of the organization in relation to the services we provide, to food safety, social responsibility, safeguarding the environment and to the health and safety of its workers.

Our Integrated Quality Management System (IQMS), which incorporates all parts of our organization's systems, procedures, and standards into one smart system, puts the above concepts to full use. By tackling all aspects of the management system, this merger allows us to streamline our management, save time, and boost efficiency.

Our IQMS is set up so that all resources involved are held accountable for delivering documents, information, or

goods that the other processes can use immediately. Thanks to the contributions of all internal and external stakeholders, this entails continuous development and update. The application of ESKO's IMSP to daily activities has been subjected to a thorough risk assessment, which has resulted in protocols that ensure that procedures are closely followed. The ongoing training that we provide to all our employees, and induction training we provide to newcomers, are particularly important.

The effectiveness of such control mechanisms is constantly assessed, and adjustments made as needed. Internal processes at ES-KO ensure that all employees have the right to associate and bargain collectively, receive equal compensation for equal work, and have access to specialized job categories based upon their competence and attitude.

The policies ensure that the Company does not hire minors, that no one is forced to work for the company against their will, that they have the right to participate in the organization of their work by making suggestions to improve productivity and health and safety conditions, and that their voices will be heard if they have a complaint about their working conditions or treatment.

The goals of ES-KO are to be a first-class employer and to promote respect for the rights of all people who work for us. We hope that by displaying our commitment and the excellent outcomes of our initiatives, we will inspire others and help to improve working conditions for everyone.

Implementation

The goals of ES-KO are to provide services that exceed our customers' expectations while adhering to all

required criteria and the requirements of the standards that we have voluntarily established.

Our Integrated Quality Management System (IQMS) combines standards for Quality Management (ISO 9001), Environmental Management (ISO 14001), Food Safety (ISO 22000) and Occupational Health and Safety (ISO 45001). The IQMS provides procedures to guarantee that these requirements are met.

Since 2019, COVID-19 has spread to practically every country and, although the situation has improved and the world is slowly returning to normality, national economies and businesses are still dealing with the consequences.

This catastrophic event has not spared ES-KO. Because ES-KO conducts most of its business abroad mainly in remote areas, the pandemic has had a significant impact upon us, making it critical to react and adapt quickly to the new circumstances to protect the safety of all employees and maintain business continuity.

Control procedures and compliance measurement methods ensure that this is the case, and corrective actions are taken quickly when non-compliance is detected. Procedures, control measures, and measuring methods are examined when non-compliance occurs and whenever the possibility for non-compliance

develops or when requirements change. The IQMS and all its elements are available to staff through ES-KO's SharePoint.

Staff are trained from the beginning of their employment and throughout their careers to ensure that they are aware of our goals and the methods we use to achieve them. When changes to the IQMS procedures and documentation are made, staff are notified via email alerts, and retraining is undertaken as needed.

Staff participation in the arrangement of their work is encouraged and there are procedures to allow them to make suggestions or report irregularities that impair their performance and wellbeing. These systems rely on suggestion boxes (anonymous way to address remarks) and an email address where employees can anonymously register their problems. All employees have access to the Human Resources department for more direct contact.

ES-KO is proud of the training it provides to employees, training that teaches them how to perform their duties and how to act in the workplace with respect for their own dignity and the dignity of their co-workers, customers, on-site subcontractors, suppliers, and the preservation of environment. Before administering sanctions for irregularities, disciplinary measures always try to correct an individual's behavior.

Although the Covid pandemic has created hurdles in this area, team-building activities are encouraged and financed so that staff form links that improve mutual respect and lower the chance of irregularities.

ES-KO evaluates its suppliers and partners' activities from the outside. Our preferred suppliers are those who have embraced mandatory and voluntary standards and can demonstrate compliance through certification.



In accordance with the 1948 Universal Declaration of Human Rights, ES-KO is committed to protecting personal privacy in the processing of personal data. *"No one shall be subjected to arbitrary interference with his private, family, home, or correspondence, nor to attacks on his honor or reputation,"* according to Article 12.

The COVID-19 pandemic provided an opportunity to reconsider how we work, hastening a process that has been in development at ES-KO and we are using smart working to anticipate the way to the "Next Normal" since April 2020.

Among other things, this new adjustment has emphasized the need to strengthen individuals' right to privacy and data protection, an issue that ES-KO has always taken extremely seriously.

Everyone has a legal right to be protected from such interference or attacks. ES-KO is increasing its levels of vigilance and security to ensure proper privacy protection for people/individuals outside of the European Union by applying the EU General Data Protection Regulation 2016/679 (GDPR) even where it is not legally required to do so.

Measurement of outcomes

ES-KO has never faced any inquiries or legal action for failing to comply with mandatory regulations.

All our operational permits and licenses are current and valid. No observations or non-conformities have been found during statutory inspections by authorized authorities.

Staff have not reported any abnormalities to the Human Resources Department, either through suggestion

boxes (anonymous way to address remarks), specific email addresses, or directly to the Human Resources Department.



Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4:

The elimination of all forms of forced and compulsory labour.

Principle 5:

The effective abolition of child labour; and

Principle 6:

The elimination of discrimination in respect of employment and occupation.

Assessment

ES-KO is active in many countries around the world, including some where trade unions are discouraged. As a result, ES-KO has always made it a priority to ensure that all employees, regardless of location, are aware of their rights as outlined in the International Labour Organization's Declaration of Fundamental Principles and Rights at Work. To achieve this, an ongoing effort is being made, particularly by our Monaco Headquarters, through quarterly information panels, policies, conversations with manning agencies (where necessary), and corporate online training courses covering pertinent and sensitive issues. The online programme started in 2021 and, to date, excellent feedback has been received by all employees.

One of our main aspirations is to have informed and happy staff, aware of their rights, working in a calm environment. To achieve this, we ensure that all our employees have access to the information they need to work in a fair, productive, and peaceful environment. We are an equal opportunity employer, as stated in our Code of Conduct, which is available in our Integrated Quality Management System (IQMS). We specifically commit to comply with the detail and spirit of all applicable laws and conduct business with honesty and integrity, ensuring all our business transactions are properly authorised and accurately recorded and documented.

We avoid all real or perceived conflicts of interest and will never pay or condone the payment of bribes.

Above all, we pledge to foster a culture in which ethical behaviour is recognised, rewarded, and modelled by all, and we will not accept discrimination on any basis, including race, gender, religion, sexual orientation, views on trade unions, age, or physical ability. We are aware, however, that there is no such thing as a risk-free environment, and as a result, we have proper

control systems in place to regularly analyse, prevent, and address any misbehaviour.

Discrimination, workplace harassment, and whistleblowing are all addressed in our Disciplinary procedure, which includes measures to correct and sanction misbehaviour. ES-KO guarantees that no employee will be sanctioned for reporting misbehaviour, and that all employees will be protected from any retaliation from colleagues.

Policy

As mentioned in the Assessment section, our Integrated Management System Policy (IMSP), which is at the core of our Integrated Quality Management System (IQMS), expresses ES-KO dedication to treating all our employees as individuals, first and foremost. We believe that having well-informed, knowledgeable, and satisfied employees is critical to any organisation's success and we actively encourage freedom of association and equal opportunities for employment and growth within ES-KO.

The IMSP emphasises ES-KO commitment to eliminating child labour and all forms of forced labour. Our employment contracts clearly specify and define remuneration, payment dates, holiday entitlement, working hours, overtime pay, medical and insurance coverage, and emergency medical evacuation, among other things. We can justifiably declare that our internal policies and contracts comply with and often exceed local standards and regulations.

Our policies and IQMS are dynamic; ad-hoc policies are routinely created and existing ones updated, to ensure the most up to date labour rights are applied and to ensure that our IQMS is relevant in relation to events in the real world. An example of this is the COVID-19 pandemic, which has been and is being constantly addressed in our IQMS. We have replaced outdated

modes of sharing in-company information with a modern cloud-based system, giving employees instant access to all information, procedures, and initiatives, regardless of workplace location or device. Since the beginning of the pandemic, a constant joint effort has been made, particularly between the Risk Management and Human Resources departments, to collect and share the most current information in terms of prevention, spread and vaccination schemes available for our employees, regardless of their location.

Regular virtual meetings between the missions Contracts/Project Managers, Risk Management, HR Management, Finance, IT, and Legal departments are an example of this. The frequency and content of these meetings is constantly updated in relation to the status of the pandemic. Sessions and attendance are recorded and shared with the HQ Risk Management and HR Department.

ES-KO supports and respects all areas of employee well-being, which is why, despite not being legally required for all our operations, we are fully compliant with GDPR (General Data Protection Regulation).

As a result, we have special regulations in place to ensure the proper handling of sensitive and personal data, including the use of dedicated encryption software to transmit data and a commitment to full transparency with the data's owner.



Goals

In terms of labour rights, ES-KO's main goal is to improve on our already exceptional market position. Having satisfied and engaged staff is critical to our long-term success and therefore a series of initiatives are constantly in progress. We are further improving our standard terms and conditions, particularly for colleagues in our field operations, going above and beyond what is legally required, and our progress in streamlining contracts and strengthening ties between field operations and headquarters is currently active and progressing smoothly.

ES-KO's relationship with statutory workers' representatives in HQ is also a constant focus for senior management team. After devoting a significant amount of resources in 2021, we have successfully reworked and published the anticipated Performance and Development Assessment Process, mentioned in last year's document. The entire process is being fine-tuned and more updates will be communicated to staff in the next few months. This will allow managers to focus on development areas for their own staff and assess performance and will help managers and staff identify potential problem areas before the yearly performance is affected.

ES-KO is an equal opportunity employer: women comprise 53% of our HQ management staff, including one Director and four Heads of Functions. Due to our original family-run business model, ES-KO has a high personnel retention rate and extended tenure inside the company, ensuring historical continuity and retained skills. At our headquarters, the average seniority is 12.5 years, while in our field operations, it is 9.1 years.

Even though we are fortunate to have a loyal and skilled workforce, training remains one of the building blocks ES-KO relies upon and is a mission-critical investment. For this reason, a new library of online courses will be chosen and presented to all our staff in September

2022, aimed at continuing and improving on the recently introduced corporate programme, which has proved to be an all-round success.

Implementation

ES-KO policies and goals are backed by procedures and initiatives that demonstrate our commitment to all our corporate objectives. This includes the Integrated Management System Policy, which is available on the ES-KO network.

As noted above in the Assessment Section, we encourage all our employees to report any abnormalities. Employees can do so using dedicated suggestion boxes, dedicated email addresses, via the dedicated officer in charge of harassment issues, and the recently-introduced system of periodic anonymous surveys, which has received excellent feedback since implementation (in 2021).

We can confidentially state that there has been no serious criticism to date. However, in line with our proactive attitude and striving for excellence, constant reviews and updates are performed by the Group CEO and senior management, including highlighting the importance of internal and external audits. During regular audits, ES-KO-trained auditors observe practices being followed at supplier sites and report any irregularities to the Risk Manager, ensuring that appropriate action is taken where necessary, to either have the supplier correct the irregularity or remove the supplier from the list of Qualified Suppliers.

As part of our certification process, all our suppliers are required to complete a questionnaire that includes numerous questions about their own employees' wellbeing and a commitment to follow the same labour values as ES-KO.

Measurement of Outcomes

Internal audits are conducted annually. Further audits however, are conducted as needed or if any criticality is anticipated. The same is true for external audits, which normally follow a set schedule depending on the certification's standard requirements.

During the yearly Management Review, all findings are presented to ES-KO Directors. If necessary, objectives and measures might be changed depending on the results of the Management Review.

As of May 2022, ES-KO can justifiably declare that no incidences of workplace harassment, discrimination, forced or underage labour or violence have been reported.



Principle 7:

Businesses should support a precautionary approach to environmental challenges.

Principle 8:

Undertake initiatives to promote greater environmental responsibility; and

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

Assessment

ES-KO is entirely aligned with the United Nations' SDGs and is committed to fully respect local and international rules and regulations applicable to its activities and to its operating system.

In a rapidly changing world of volatility, uncertainty, complexity, and ambiguity the "business as usual" approach to social and environmental concerns is insufficient; our corporate philosophy is based on conviction that companies of the future are the ones using business as a force for good.

To put our vision to practice, ES-KO applies an Integrated Quality Management System (IQMS) to comply with the ISO 14001:2015 "Environmental Management Systems". This certification is important because it allows for increased process control, greater productivity and employee engagement and consistency of measurable outcomes.

ES-KO firmly believes that its "environmentally friendly" standardization and status, while maintaining a focus on environmental risk, will help our journey towards a more sustainable future of operations.

In May 2022, ES-KO passed the external annual audit by an accredited third-party certification body and the compliance with the ISO 14001:2015 Standard has been confirmed for all the services provided by our headquarters and operations.

Additionally, ES-KO commits to perform a careful assessment of risks to the environment posed by activities performed at the HQ level and in field operations even if the nature of ES-KO's business (food supply, catering, camp construction and services) makes little direct environmental impact since we do not perform any heavy industrial activity.

Policy

ES-KO's Environmental Policy aims to drive the company's processes towards solutions of greater respect for the environment, limiting the consumption of energy and natural resources, lowering the negative impacts that our activities may have, including specific measures to avoid polluting the environment and adopting appropriate and proven waste management and re-cycling practices.

ES-KO'S Environmental Policy is contained in our Integrated Management System Policy, communicated to staff through ES-KO's Intranet and it includes a commitment to continual improvement of the Environmental Management System to enhance environmental performance.

Goals

As part of its Corporate Social Responsibility, ES-KO has defined specific environmental objectives as follows:

- **To source our products locally as much as possible to avoid transport CO₂ emissions and waste.**
- **To reduce as far as possible the use of energy, water, and materials in our processes.**
- **To reduce waste production and ensure recycling of materials.**
- **To train staff in environmental issues and how to address our responsibilities in the workplace to help reduce negative environmental impact.**
- **To propose more sustainable business strategies to encourage our stakeholders in thinking more about environmentally friendly initiatives.**
- **Limit to the minimum the use of personnel travel (specifically by plane) and promote the deployment of virtual conferencing.**

Implementation

In addition to the usual tasks that ES-KO performs to ensure the implementation of an Environmental Management System compliance with the ISO 14001:2015, we accomplished four main activities to reduce waste and the use of energy, water, and materials:

Reduction of waste

- 1) Creation of branded reusable bottles.
- 2) European Week for Waste Reduction (EWWR).

Reduction of the use of energy, water, and resources

- 3) Implementation of smart working at the HQ.
- 4) Air conditioners temperature policy.

Branded reusable bottles

To avoid the use of single use plastic bottles, ES-KO created branded reusable bottles and commenced distribution in the largest ES-KO operation to all the employees in South Sudan. We extended the distribution of reusable bottles to all employees working in all ES-KO operations. Our goal is to minimize plastic waste and raise awareness amongst our employees.



European Week for Waste Reduction (EWWR)

In November 2021, ES-KO participated for the first time in the European Week for Waste Reduction (EWWR) when the Department of the Environment of the Principality took part in this major European campaign to raise awareness of reducing, reusing and recycling waste.

In 2021, the EWWR put a spotlight on circular communities. At the European level, over 12,400 actions on reduce, reuse, recycle and clean-ups ready took place during this 13th edition. At a local (Monaco) level, 46 companies participated, for a total of 69 actions including tips on how to be a responsible organisation, conferences, exhibitions, workshops, “zero-waste” cooking demonstrations.

At ES-KO level:

- Specific guides about the Waste Hierarchy - 3 Rs - Reduce Reuse Recycle have been created and shared with all the sites (HQ and operations) to be read and displayed
- Employees have been invited to Toss/Reuse objects and Lend/Borrow books
- Titles of informative films on waste reduction have been communicated

The aim was to encourage people to consume better, produce better, discard less, and extend the life of their products.

ES-KO is looking forward to participating to the 2022 edition of the EWWR.

Smart Working

Since 2020, and as part of the “Next Normal”, ES-KO

has fully implemented smart working at our Monaco headquarters. This has contributed to a reduction in power consumption and emissions due to reduced commuting, less paper usage through increased document digitization, and opportunities to make a positive impact on the environment with the extra time from not commuting and spending more time at home (e.g. gardening; preparation of eco friendly meals; less single use materials for cooking and drinking).

Air conditioners temperature policy

In 2022, to comply with UN Sustainable Development Goals, and to reduce energy consumption and consequent environmental impact, ES-KO set 24°C as the lowest temperature for the air conditioning system. Our new Air Conditioners Temperature Policy has been communicate to and implemented by all ES-KO sites (HQ and operations).

Measurement of outcomes

ES-KO strongly believes in the important of measuring and monitoring efforts in environmental sustainability. Digital tools are a great way to track our initiatives. Consequently, ES-KO has invested significant resources to boost the efficiency of our incident reporting procedure. We have deployed a software solution that automates the reporting of workplace incidents, including those that have impacts on the environment. These can then be rapidly assessed and addressed.

ES-KO has not had any environmental incidents within the last two years and has not been subject to any statutory notices or prosecutions. Periodical external audits by an accredited third-party certification body, have not revealed any non-conformities concerning our Environmental Management System, and confirmed the ISO 14001:2015 certification.

Periodical internal audits of our projects, carried out by our qualified internal auditors, have not revealed any non-conformities concerning Environmental Management System.

Furthermore, ES-KO aims to subscribe to tools such as *SDG Monitor*, a cloud-based platform, which allows us to track our progress to achieve the UN's 17 Sustainable Development Goals. We are confident that with *SDG Monitor* we will be able to track whether we are making progress or falling behind, and hence act. Additionally, we will be able to communicate, through graphic and visual dashboards, our efforts in sustainability to stakeholders and inspire others to join us in taking action as well through a leverage effect.

ANTI-CORRUPTION PRINCIPLE



Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

Assessment

ES-KO fully complies with all laws, rules, and regulations applicable to its business and the countries within which it operates. In this regard, ES-KO supports the UNGC principle on anti-corruption by having a zero-tolerance policy for corruption in all its forms, including bribery and extortion.

Corruption is certainly an ongoing issue in some of the places ES-KO operates. We evaluate all operational areas to ensure that our reputation and principles are not compromised. ES-KO conducts business with international companies based in jurisdictions such as the EU, UK, and the USA, where there is strict anti-bribery legislation. ES-KO's stance against corruption includes zero tolerance for any form of bribery and this applies to all ES-KO employees, suppliers, customers and other business partners. International companies will not wish to conduct business with us unless we have a robust stance against bribery.

A careful assessment of the potential risk involved in working in those countries where bribery can be considered systemic is therefore critical, as are a robust anti-corruption policy, anti-bribery management and fostering an anti-bribery culture within all the organizations of the ES-KO Group.

Our assessment looks at opportunities for bribes being sought by officials, by customers, by suppliers and contractors and by the Company's own staff. Opportunities may arise in several areas such as trading influence or abuse of powers. ES-KO is fully committed to ethical business practices and takes its legal responsibilities to prevent regulatory non-compliances seriously.

ES-KO seeks to implement a well governed and compliant culture for all the ES-KO Group (in adherence with all local, national, and international laws and regulations), while:

- Focusing on prevention, detection, and response to compliance issues.
- Leading and interfacing with regulators or clients to address potential areas of regulatory and global business compliance vulnerabilities and risks.
- Keeping its staff informed of policies, guidelines and all documents that prevents corruption and bribery in all its forms to maintain a clear, transparent communication.

Policies

ES-KO has a zero-tolerance policy in respect of corruption in any form and we are committed to upholding all relevant laws and supporting regional and international anti-corruption legal frameworks, such as the United Nations Convention Against Corruption, the OECD Anti-Bribery Convention inter alia.

At ES-KO, everyone has the responsibility to comply with ES-KO's policy and guide, and the laws and regulations in the countries where we operate. We also expect our business partners such as suppliers, agents, representatives, contractors, subcontractors, and consultants to conduct themselves according to those values and principles.

Our Integrated Quality Management System includes several documents concerning the ethical conduct of our activities:

- Authority Levels.
- Code of Conduct.
- Local Procurement.
- Procurement Ethical Code.
- Anti-Bribery Policy and Anti-Bribery Guide.

- **Recording of bribery.**
- **Letter to suppliers about gifts, entertainment and hospitality for the year-end.**

Authority Levels determine limits within which each employee may bind the Company to an obligation, whether payments (purchases, funding, advances, personal expenses etc.), execution of contracts (RFPs, bids, performance bonds, contracts, and contract amendments) or other obligations (letters of intent, memorandums of understanding, provision of services not covered by a proper contract).

The Code of Conduct, to which every employee subscribes, ensures that business conduct is free from conflicts of interest whether real or perceived and those assets, whether ES-KO's or the Customer's, are not used inappropriately. It requires employees to avoid illegal conduct in their business and private lives and to protect the Company's reputation in all their dealings. It makes clear that money, gifts of more than nominal value and hospitality beyond what would be normal may not be given to customers, competitors, or suppliers to favour either ES-KO or the employees themselves. It ensures that company files, records and other information are kept confidential and protected from unauthorized access.

It binds all employees to complying with the spirit of applicable laws and regulations governing the conduct

of ES-KO's business. It makes clear that ES-KO will never pay or condone the payment of bribes or other improper payments. It leads employees to promote a culture in which ethical conduct is recognised, valued, and exemplified.

Local Procurement and Procurement Ethical Code govern the way in which employees participate in the purchase process for goods and services necessary for the Company's activities. They ensure procurement follows ethical lines and is done in the best interests of ES-KO and its Customers with no personal benefits or involvement.

ES-KO recently implemented in 2021 an Anti-Bribery Policy and the Anti-Bribery Guide to protect our people and our business. Our guide supports ES-KO businesses, Staff, Service Providers, and Joint Venture Partners in complying with the UK Bribery Act 2010 (<https://www.justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf>), the US Foreign Corrupt Practices Act (<https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>).

All ES-KO staff, Service Providers and Joint Venture Partners must observe the requirements of our Anti-Bribery Policy and the Anti-Bribery Guide. ES-KO is against any form of Bribery or/and Corruption. ES-KO carefully selects Service Providers Joint Venture Partners by adopting a "risk-based" approach to the selection and verification to ensure Anti-Bribery rules are respected.

Members of the staff must report internally any breaches or potential breaches of ES-KO's Anti-Bribery Policy and Guide as soon as possible. They can report A "Recording of Bribery Log" was recently implemented in 2022 and circulated to all ES-KO staff for their information. The Recording of Bribery Log also available on ES-KO's own intranet system. This document provides a list of information about a potential corruption (with a series of questions) that



allows ES-KO to learn more about the situation and take appropriate action.

All ES-KO Staff, Service Providers and Joint Venture Partners should take extra care when interacting with public officials to ensure Anti-Bribery rules are respected. Any gifts and hospitality given or received by Staff, Service Providers and Joint Venture Partners must not be intended to influence a business relationship or transaction, and ES-KO Staff, Service Providers and Joint Venture Partners should always act in compliance with ES-KO's Anti-Bribery Policy and Guide to avoid any allegation of giving improper gifts or hospitality.

ES-KO has also issued a letter to suppliers about Gifts, Entertainment, and Hospitality for the year-end stating that we encourage them to direct their attention towards their local community or disadvantaged and vulnerable groups and determine how their company can offer support where truly needed through gifts, donations, or volunteer work.

Goals

- To continue support for the UN convention and other legal frameworks in their fight against corruption.
- To ensure that transparency is maintained to demonstrate ES-KO's commitment to excluding corrupt practices from our business dealings.
- To ensure clear and transparent communication with all our stakeholders.

Implementation

ES-KO's policies are implemented through appropriate procedures contained in the Integrated Quality Management System, accurate record-keeping, and

internal and external oversight. We are committed to fighting corruption in all its forms and to do business with the highest sense of transparency and integrity. Our Anti-Bribery Policy and the Anti-Bribery Guide were sent last year to all our employees and are available to staff through ES-KO's Intranet site.

In February 2022, the anti-bribery policy, the anti-bribery guide with the addition of the Recording of Bribery document have been re-circulated to all ES-KO staff.

Measurement of outcomes

There have been no reported cases of attempted bribery or conflict of interest and no disciplinary actions have been taken against any of our employees.



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ES-KO is a 24 hour and 7 day a week operation



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People to trust in difficult times