



COLUMBIA
GROUP

CODE OF CONDUCT

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WHY THE CODE MATTERS



INTRODUCTION TO OUR COLUMBIA GROUP CODE OF CONDUCT

Dear Colleagues and Partners,

"Walking the walk", "actions speak louder than words" and "treat others as you would expect to be treated yourself" are just three of the many "Old Sayings" that have rung true down through the ages and attempt to offer guidance on acceptable behaviour.

As a group, the Columbia Group has a very strong culture supported by seven powerful core values held together by our all embracing I Care Philosophy. We are in good shape, have our proverbial flag to rally around and have a great sense of belonging to the Columbia Family.

Sometimes, this is not enough. In celebrating our rich diversity of nationalities, genders, religions, beliefs, languages, we sometimes forget that that such diversity can lead to misunderstanding as to what behaviour is expected of us, to one another and to the outside world, particularly where command of the English language is not strong. We sometimes need some guidance on what constitutes such acceptable behaviour. Such guidance is not exhaustive - it cannot contemplate every situation - and it must rely upon an individual's intelligence and "common sense". If we think about it enough, we really know how we should behave and what is expected of us, we just need to have a prompt sometimes. And we need to know that we can always ask if we are in any doubt about our (or our colleagues') behaviour. Asking is a sign of confidence and intelligence and will prevent the vast majority of incidents of unacceptable behaviour. Always ask if in doubt.

I commend to you all this Code of Conduct which please read. We are a terrific Group, but to remain that and to continue to grow and develop we must always make sure we do not just talk the talk, but walk the walk. Let this Code of Conduct be your guide on the walk ahead. It applies to every one of us on board and ashore, to our partners and service providers.

Mark O'Neil
President and CEO
Columbia Shipmanagement Limited

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WHY THE CODE MATTERS

GOING FORWARD

Each of you will be required to read the Code of Conduct and agree to its terms. It represents a personal contract, towards your colleagues and towards the Columbia Group and Family.

By taking this step we will remind ourselves of what it means to be part of this amazing family. It will also remind others doing business with us exactly why they chose (and will choose) Columbia.

Our company mission and vision can be found [here](#).

WHO IS THE CODE OF CONDUCT FOR?

This Code of Conduct sets out what behaviour we expect from each “Columbian” on board our vessels and ashore, and from our contractual partners, service providers and associates.

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CODE OF CONDUCT PURPOSE

The new Code will provide all with an easy-to-use reference point. This document intends to better explain the link between our Core Values/I CARE Philosophy and accepted behaviour. It will give some examples where behaviour would not accord with our Core Values and would therefore be unacceptable. It is by no means exhaustive and serves as a general guide.

This Code of Conduct draws on many aspects of the CSM Management System as well as our Company's 'I CARE philosophy' which *'focuses on recognising the absolute importance of growing a strong Company culture with which its employees, crew and clients can readily and willingly identify and adopt'*. Non-compliance with any part of this code can, in the most serious of cases, result in dismissal or criminal proceedings against the individual.

To summarise:

- 01** The Code is built upon the foundation of our existing Company values and I CARE philosophy – in short, working in an honest, respectful and transparent manner;
- 02** The Code summarises in one document our key policies, and the procedures which support them;
- 03** Employees shall communicate with their superior or use the Open Reporting System to raise concerns/report violations of the Code;
- 04** CSM will take appropriate action against employees onboard or ashore who do not follow the Code.

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HOW TO REPORT

Please see the below graphic reflecting the steps one must take in order to report:

**CONCERNED ABOUT
A MISCONDUCT?**

CONTACT YOUR LINE MANAGER/SUPERIOR

OR

USE OPEN REPORTING SYSTEM/PROCEDURE

THE OPEN REPORTING SYSTEM

Compliance with International and National Rules and Regulations, as well as with all requirements of the Company's Management System, is every employee's responsibility. As part of that responsibility, it is your duty to promptly inform the Company of any practice that contradicts, or you suspect to contradict, any rules and regulations or Columbia Shipmanagement policies.

The Company urges all employees to report such information to the Master (if onboard) or the Head of Department (if ashore) or a senior member of staff such as a Line Manager or direct superior or contact directly by telephone call, SMS-text, or e-mail:

- the DESIGNATED PERSON ASHORE (DPA) **or**
- the ENVIRONMENTAL COMPLIANCE MANAGER (ECM) **or**
- the TOP MANAGEMENT (TM).

You may also use the specific e-mail address: openreporting@csm-d.com

If you prefer not to report directly to the Company, you may also report to a dedicated **THIRD PARTY** at the e-mail address: open-reporting@open-reporting.com or call the toll-free number: **+800 – 19293949**

You will not have to reveal your name but if you wish to do so, then we assure you that your identity will be held in strict confidence.

CSM's commitment to all employees:

**COLUMBIA WILL NOT RETALIATE AGAINST ANY
EMPLOYEE MAKING SUCH REPORT.**

**COLUMBIA WILL INVESTIGATE AND FOLLOW UP ANY
CONCERNS SUBMITTED BY OPEN REPORTING.**

WE RELY ON YOUR COOPERATION.

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MANAGERS'/ OFFICERS' RESPONSIBILITIES

Line Managers and Senior Officers are expected to act in an honest and transparent manner in all of their duties. They are responsible to act as role models for their team, whether onboard or ashore and handle any concerns raised in a confidential and timely manner.

Taking into consideration the international nature of the shipping industry, issues raised should be treated with cultural and diverse sensitivity.

A Manager or Senior Officer must always be open to discuss issues with their teams. Those in leadership positions throughout the Columbia Group are expected to set an example.

To summarise:

- 01** Line Managers and Senior Officers should ensure their colleagues are familiar with the Code of Conduct;
- 02** Line Managers and Senior Officers should treat employees fairly and demonstrate the Code of Conduct in their daily work life;
- 03** Line Managers and Senior Officers shall be available as a line of communication for employees and crew with questions or grievances. Same to be treated with strict confidentiality.

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WHAT WE ALL MUST DO



Conduct ourselves in an **ethical manner** and take pride in our decisions, **behaviour**, and actions



Fully commit to, and adopt in our daily work, the **CSM Core Values, Management System** and **I CARE** philosophy



Recognise the absolute importance of, and benefit in, having a strong **Company culture** which all employees can readily and willingly identify with and adopt



Appreciate and recognise the **responsibility** we all have for each other and for upholding **our purpose** as a Company including our commitment to **quality**



Support our commitments to health, safety, welfare, security, the environment and our communities



Recognise that the Code does not cover everything and use our **judgment** to make ethical decisions



Report any misconduct or non-tolerant activity to either your direct superior, Line Manager, or via the Open Reporting System

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CORRUPTION

‘Our business’ lists four topics which pose a threat to the Company and all employees. Failure to comply with any of these could result in dismissal and, in the worst cases, criminal charges if found guilty.



OVERVIEW OF CORRUPTION

Corruption is defined as “dishonest or fraudulent conduct by those in power”

It is the duty of every employee to report corruption if detected, or suspected through your direct superior or Line Manager or alternatively use the Open Reporting System. Training on Anti-Corruption procedures, including the requirements of the Maritime Anti-Corruption Network or MACN, is part of the induction process for all new employees. All existing employees should receive regular, relevant training on how to implement and adhere to this policy at all times. Employees must take all reasonable efforts to preserve confidentiality in order to protect Columbia's assets and information.

Common forms of corruption include bribery, fraud or embezzlement. However, although these activities may appear out of place in your everyday work, lesser examples of corruption are more common. For example, an employee lying about their travel expenses or backdating a document is also a form of corruption. Someone onboard one of our vessels who lies about overhauling valves because he/she does not want the vessel to receive observations during a SIRE inspection may be passionate about the Company, but in the wrong way and for the wrong reasons. He or she is not behaving in an acceptable manner.

Always report any suspicious activity if you see it happening, and be aware that corruption can happen at any level of the organisation. A senior member onboard (Officer) or ashore (Manager) can help clarify any questions you may have regarding corrupt activities observed in the workplace. Columbia requires all employees to use their common sense and report anything to their superior or by using the Open Reporting System should they experience or see any behaviour which could be viewed as dishonest or fraudulent. However, it is important to note that the Company does not prohibit the following activities, particularly in relation to its international role in shipping: normal and appropriate hospitality, the giving and receiving of small ceremonial or seasonal gifts. Such hospitality or gifts must be justifiable and not place any expectation on the part of the giver to expect preferential treatment of any sort from the recipient or the recipients' employers.

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GIVING OR ACCEPTING CORRUPT ADVANTAGE

A corrupt advantage is defined as "Offering/receiving favours from certain parties (including families and friends) in order to gain an improper advantage in the workplace. This also extends to offering/receiving money or goods."

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of the Columbia Group, you may be faced with a conflict of interest. To avoid this, when considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to benefit yourself, or those around you, at the expense of Columbia. If the answer is "yes," this is likely to create a conflict of interest situation, and must be avoided.

These types of corrupt acts include, but are not limited to, using invitations to drinks, meals, parties, or other entertainment, offers of services to secure an advantage. Accepting inappropriate gifts could damage the Company's reputation. We ask all employees and crew to exercise common sense in relation to giving/receiving favours and if unsure, simply refrain from accepting the gift at all.



FAVOURITISM

Favouritism is defined as "the practice of giving unfair preferential treatment to one person or group at the expense of another"

Receiving gifts or preferential treatment from a co-worker or client may constitute as favouritism. If given something by a co-worker or client, ask yourself "is this affecting my decisions?". Also ask "is the person giving the gift out of a desire for personal gain?". Gifts of this nature could be inappropriate in the work environment and may arouse unnecessary suspicion. Further, if you believe that one person or party is being consistently singled out for unjustified reward then you must report it – for example, preferential treatment given because of an individual's nationality. You can report this by either reaching out to your direct superior or Line Manager, or alternatively by raising it through the Open Reporting System.

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MONEY LAUNDERING

Money laundering is defined as “the process of concealing the origin of money obtained from illicit activities such as embezzlement, graft, or bribery and converting it into a legitimate source”

The Company does not tolerate any form of money laundering and it is the duty of every employee to raise any suspicious activity to their direct superior or Line Manager, or alternatively use the Open Reporting System as soon as it is detected. Money laundering is becoming increasingly sophisticated, which is why we must all be vigilant to unknown parties asking for services without proper due diligence having taken place, especially when large volumes of cash are given as payment.

Political and Charitable Contributions

Giving political contributions – in any form – on behalf of Columbia is prohibited. Personal contributions cannot involve, or be perceived to involve, Columbia. Philanthropic donations and non-commercial sponsorship are made only to duly registered or accredited independent nongovernmental organisations (NGOs) or not-for-profit charities. Any such donations made in Columbia’s names must be approved by top management.

Antitrust

Columbia’s policy is to comply with all applicable antitrust, competition and fair trade laws and regulations of each country and region where Columbia conducts business. We must know and comply with those laws and regulations applicable to our jobs. If you have any related queries, please ask your line manager or direct superior who will check with the responsible team.

Improper spending

When you submit an expense for reimbursement or spend money on Columbia’s behalf, all costs should be reasonable, related to company business and must be supported by correct documentation (including the business purpose). If you’re uncertain about whether you should spend money or submit an expense for reimbursement, please ask your direct superior or Line Manager who will check with the responsible team.

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HARASSMENT

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OVERVIEW

Harassment is defined as “any form of discrimination which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment”

Columbia is committed to creating and maintaining a work environment free of harassment and has a zero-tolerance approach to any instances of harassment related to race, ethnic or national origin, colour, gender, sexual orientation, religion, age, disability or other personal attribute of any employee, contractor or other third-party. Harassment does not have to be a repeated action but can also be a one-off act. Columbia’s Human Resource department is intended to help employees. It is HR’s role to help employees and mediate between the complainant and the accused in order to understand both sides of the incident. In handling allegations the HR team will act as a neutral, objective party instead of a direct supervisor. As an employee, you should report your harassment claims right away so an investigation can begin.



SEXUAL HARASSMENT

Sexual Harassment is defined as “unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating the recipient’s dignity”

Common examples of sexual harassment include making unwanted sexual advances or violating a person’s personal space. The Company has a zero-tolerance policy to any and all instances of sexual harassment. If you see any occurrences of sexual harassment (or are a victim of sexual harassment), it is vital that you either tell your direct superior/Line Manager or use the Open Reporting System. Every employee of Columbia has a role to play in making sure instances of sexual harassment do not occur and reporting any that might be observed. Inappropriate comments about women colleagues, or intentionally trying to embarrass colleagues in general by making rude remarks is unacceptable. Onboard, it is vital that female seafarers feel safe – especially if working as the only woman onboard amongst a male crew.

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EQUAL OPPORTUNITY

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OVERVIEW

Equal opportunity is defined as “giving everyone the same opportunities for employment, pay, and promotion, without discriminating against particular groups”

The Company is committed to providing equal opportunities to everyone regardless of any differences including sex, race, or age. Diversity in our workforce is essential for us to attract and retain the best possible people and to face the challenges of tomorrow. There is no space at Columbia for prejudice of any kind – if you observe this happening, it is your duty to report this to your direct superior or Line Manager.

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DRUG AND ALCOHOL

'Our business' lists four topics which pose a threat to the Company and all employees. Failure to comply with any of these could result in dismissal and, in the worst cases, criminal charges if found guilty.



OVERVIEW

It is the policy of the Company to maintain a safe and healthy working environment, ashore and onboard vessels, free from the use of illegal drugs and any unauthorised consumption of alcohol. Unauthorised trade, distribution, purchase and/or offer for sale, on Company premises or on vessels, of any alcoholic beverages or drugs is a violation of this policy. Authorised and controlled sale and consumption of alcoholic beverages, as well as the use of prescribed drugs onboard vessels is exempted. These guidelines are in place to help protect the safety of Company employees and clients.



DRUG ABUSE

Employees are strictly prohibited from carrying out duties whilst impaired by alcohol or any illegal or non-prescribed drugs. Any employee found to be breaking these company rules will be dismissed.

Seafarers are not permitted to bring undeclared drugs on board, and if drugs are brought on board, they must be legal. The only exception to bring medicines onboard will be in case of prescribed treatment for which you should carry a document signed by a doctor which should be handed over to the Master upon joining the vessel. Please note that all personal medical information will be kept confidential.

If you, or anyone you know, at the Company is struggling with drug addiction or is performing their duties whilst under the influence of drugs, you must notify your direct superior, Line Manager or use the Open Reporting system to report this. By not informing someone of this, the person in question is potentially endangering the lives of themselves and the people around them.

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ALCOHOL ABUSE

All employees are prohibited from performing their duties whilst under the influence of alcohol. A significant part of our fleet has been declared dry, as per client requirements. Seafarers shall refer to the Drug & Alcohol manual for specific details. If you, or anyone you know, at the Company is struggling with alcohol addiction or is performing their duties whilst under the influence of alcohol, you must notify your direct superior, Line Manager or report the incident to the Open Reporting System.

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PEOPLE AND CULTURE

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PEOPLE AND CULTURE

HEALTH AND SAFETY

‘People and Culture’, lists four topics that all employees need to respect if we are to ensure that everyone is able to operate successfully and sustainably in whichever department or vessel they work in.



OVERVIEW

As a responsible Company we have a duty to all of our employees. This duty is a commitment to improving all work-related occupational health and safety issues. Namely, aiming for incident and accident-free operation using a proactive approach, recognising and eliminating potential hazards and implementing corrective and preventive actions for all employees and companies we interact with. Operating in a safe way is not only essential to protect all of us, but it is also essential to the success of the Company and servicing the needs of our Clients. Occupational Health and Safety is the shared responsibility of all employees. While the overall responsibility for occupational Health and Safety rests with the Top Management (ashore) and with the Master (at sea), it is the duty of all employees to report all violations to their direct superior, Line Manager or via the Open Reporting System. Each and every one of us must get 'personal' about safety.



HEALTH

Recent events such as the COVID-19 pandemic have highlighted the importance of public health and wellbeing like never before. At CSM we are committed to providing a healthy work environment. This includes providing all employees with the necessary support and guidance when it comes to matters of health. For example, CSM runs health campaigns for all employees at sea and onshore to encourage healthy lifestyles. Our commitment to health is not just limited to the physical sense of the word either. The company also provides a Mental Health Helpline which can be reached 24/7 if you need someone to talk with. All calls will be treated in complete confidence.

Freephone: +800 59697989

Email: Charles@mentalhealth-support.com

WhatsApp/Viber: +49 1621095976

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SAFETY

Safety is at the forefront of everything we do as a Company and it is the personal responsibility of each and every one of us. Accidents are not occurrences that happen to other hypothetical people. They happen to us, our friends, our colleagues, our families. They cause pain - physical and emotional - to all those affected. We must get personal about safety. We must perform each safety drill, check each piece of equipment as if the lives of our fathers, mothers, sisters, brothers, sons and daughters depended on it. Because if they had depended on it you can be sure the vast majority of the careless accidents would not happen.

Every safety drill must be performed and each piece of equipment must be checked to prevent accidents – big or small – and we are all required to be familiar and comply with the established health and safety procedures. Following them not only guarantees our own personal safety and that of our colleagues – let’s bear in mind that one careless accident can destroy our lives of not only us but and our loved ones’ too.

Our ongoing target is to provide the safest possible environment for our staff onboard and ashore. The Company’s aim is zero accidents and zero illnesses. In case either occur, we investigate each incident both to rectify the situation and prevent future instances of the same.

The nature of our seafarer’s work places additional importance on safety procedures which require strict adherence. Onshore, our CSM offices conduct risk assessments at regular intervals to protect both onshore personnel and third parties entering our premises.

Be vigilant and report anything that could cause injury or loss of life! If you are unsure about any safety procedures, or believe additional safeguards are required, notify your direct superior, Line Manager or report it via the Open Reporting System.

We must put safety at the absolute top of our priority list. Let's get personal about safety - because lives depend on it.

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ENVIRONMENTAL AND SOCIAL PERFORMANCE

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OVERVIEW

Companies around the world are prioritising sound environmental and social performance, focusing on creating and pursuing more sustainable ways of doing business. In this respect, CSM is no different. The Company is committed to ensuring that every aspect of its activities are conducted in accordance with sound environmental and social standards. CSM places high importance on the conservation, and the protection, of the environment as well as the energy-efficiency of its activities. CSM has a unique responsibility to be diligent in our environmental performance as the work we do for our Clients is largely based on compliance and adherence to international rules and regulations. It is essential that all employees in the office or at sea are pollution-conscious and have a responsible attitude towards pollution prevention, preservation of natural resources and energy efficiency.



ENVIRONMENTAL PERFORMANCE

Having a comprehensive and credible environmental strategy is not only morally right for us as individuals, but also necessary for us as a business. Environmental compliance should not be a chore – we should willingly embrace it– for the sake of the environment, our children, our colleagues on board and ashore and our fantastic Company. We should also have no hesitation in calling out those who refuse to embrace environmental compliance, or who deliberately breach the MARPOL and other environmental regulations. All employees at sea are required to demonstrate a clear understanding of their MARPOL duties and obligations and to ensure strict compliance in every aspect. Never drop your environmental standards or allow others to drop theirs. If you suspect any violation of environmental requirements, or believe that our processes could be improved, it is vital that you notify your direct superior or Line Manager, or alternatively use the Open Reporting System.

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SOCIAL PERFORMANCE

CSM recognises that it’s our people, with their individual qualities and personalities, who distinguish our organisation. CSM cares about all staff and their families which is evidenced by our I CARE philosophy. CSM endeavours to contribute towards the various local communities in all areas of operation and seeks to partner with other socially conscious businesses that share our values.

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QUALITY OF SERVICES

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OVERVIEW

The Company is committed to consistently providing products and services that meet (and exceed) customer and regulatory requirements.

The company continues to be a pioneer in the implementation of safety of life at sea culture and safe ship and cargo operations. It endeavours to be a role model in the fight against pollution and other environmental hazards.

We adhere to and create best industry practices. Columbia operates its fleet with maximum efficiency for an uninterrupted performance. Crew competence coupled with a strong safety culture makes us leaders in retention rates of all employees.

If you believe that our ability to deliver quality services to our clients is being compromised in any way, it is your duty to report this to your direct superior or Line Manager, or alternatively use the Open Reporting System.

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HUMAN RIGHTS

‘People and Culture’, lists four topics that all employees need to respect if we are to ensure that everyone is able to operate successfully and sustainably in whichever department or vessel they work in.



OVERVIEW

Human rights are the basic rights and freedoms that belong to every person in the world regardless of nationality, gender, origin, religion, language, or any other status, and are based on shared values like dignity, fairness, equality, respect and independence.

CSM works hard to safeguard and guarantee the human rights of all people in the Company and those who we have relationships with. Whilst we are all different, human rights are inalienable and must be protected at all costs. The Company is fully compliant with all relevant rules and legislation regarding human rights and has a no-tolerance approach to any violations of the same. CSM uses its international footprint to positively influence different groups of stakeholders.

If you believe that human rights within the Columbia Group are being violated in any way it is your duty to report this to your direct superior or Line Manager or alternatively use the Open Reporting System.

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COMMUNICATIONS

‘People and Culture’, lists four topics that all employees need to respect if we are to ensure that everyone is able to operate successfully and sustainably in whichever department or vessel they work in.



OVERVIEW

Clear communication is key for effective operations. Pay attention to the way you communicate with onboard crew; misunderstandings can be avoided between ship and shore by clearly written messages. It is equally important to have transparent communication between departments, and overseas offices. All communication must be respectful - we are an international company of all ages, ranks, nationalities and economic backgrounds. Our differences should not make anyone feel less respected than another. Think about the way you talk to those around you. Time zones should be taken into consideration when seeking urgent information. We are all working for one group – the Columbia Group – and need to tackle any problems arising together. As a group that always aims to improve, it should be noted that good ideas can come from anywhere which is why two-way communication is so important to our organisation worldwide. Improvements and ideas can be shared with our Marketing team: Marketing@csmcy.com or, if related to operations, via your direct superior or Line Manager.



GENERAL CYBER SECURITY

Cyber security is of extreme importance - onboard systems including GPS, AIS, ECDIS Radar and autopilot can be affected by viruses and malwares making our vessels clear targets for cyber-attacks. Malware can be transferred to a corporate system through the uncontrolled use of removable media or the direct connection of untrusted devices. All employees are required to follow cyber hygiene and best practices to keep the company cyber space, especially Company-issued electronic devices can also pose a threat to the Company if used inappropriately – employees ashore and onboard are required to follow the approved means of communication. A moment of carelessness can put the company at risk - for example, by addressing sensitive information to a wrong recipient on an e-mail. As part of its data governance the company takes measures to protect personal and confidential data by means of encryption in order to ensure confidentiality, integrity and availability of data to us and our clients. Devices must at all times be used in compliance with the Company’s IT Policy and procedures as well as the acceptable usage policy within the Management System.

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INTERNAL

Employees should be proactive in our daily work, whether onshore or at sea. To avoid misunderstandings, handle requests by asking “Is it urgent?” or “How soon do you need it?”.

Learn to improve your reactions under time pressure by approaching a conflict or crisis with a level head. Offer support to new colleagues as they settle into the Company - we can learn “the more I cooperate, the better the company’s going to function”. That does not mean the end of disagreements; only that we work together to work them out.

When answering phone calls, always identify oneself and pass on phone messages to absent colleagues. If working from home as per the hybrid work policy, professional communication remains mandatory.

The Crew Connect portal is an important communication tool for our crew to stay informed with Company news. An app is available to download for our e-learning platform, Adobe Captivate Prime (ACP). Communication onboard includes behaviour towards colleagues as when seafarers are at sea, the ship is not just their place of work but also their place of living. Anti-social attitudes are not tolerated on board our ships.

Regarding ship-shore communication, prompt reporting of any onboard NavCom equipment failure to the NavCom Group is vital.

Private communication during company hours should be limited to urgent reasons. The Group follows all GDPR-related regulations in terms of photos and video use from company events.

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EXTERNAL

All employees are encouraged to communicate with clients in a clear and timely manner. The Company places high priority on communication with clients and aims at the most efficient exchange of information possible at all times. All appropriate feedback and development plans are to be communicated in a timely way to customers using all available means of communication, such as regular reporting, meetings, video conferences, telephone and email. The company measures client satisfaction via Client Satisfaction Questionnaires, and special attention is paid to how employees communicate.



SOCIAL MEDIA

The Company recognises the importance of social media and encourages all employees and its associates to use social media with care and in a positive way. Use of social media is particularly sensitive during an operational incident and all employees must behave in accordance with our social media guidelines and the media response procedure. Never publish inaccurate information and keep confidential all information and documents related to Columbia. The Company has established a social media presence on a variety of platforms and welcomes all employees to follow the Company’s profiles. The Marketing Department is responsible for the control and coordination of all CSM offices’ social media, internet and general PR and media activities that represent the Company. If you detect that someone is using social media in an inappropriate way you must notify your direct superior, Line Manager or the Open Reporting System.

Key Procedures and Guidelines

- 01 Video conferences and office seminars are widely used to improve internal communication;
- 02 Detailed procedures in the shipboard manuals are clearly addressing the regular communication between ship and shore;
- 03 The Company’s Core Values and Policies are applicable and must be followed on social media;
- 04 Please refer to the Company’s social media policy which is referred to in our CSM manual;
- 05 The company plans to take measures to monitor social media exposure in order to identify misuse and other negative trends.

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About the iCARE Philosophy

Columbia launched the iCARE motto back in 2018, further proving that the iCARE philosophy and values have always been deeply rooted in Columbia's culture and DNA. iCARE focuses on recognising the absolute importance of growing a strong company culture with which its employees, crew and clients can readily identify and easily adopt.

Our core values are the cornerstone of Columbia's company culture that every single employee needs to live by.



RESPECT

Respect is "understanding and honouring the value of people"

It is treating people as we would expect to be treated ourselves, being fair, considerate, open-minded, approachable, and honest. Respect is earned but cannot be demanded.

Teamwork begins with respecting your colleagues. People should always be respected for the job they do, regardless of their position. This will ensure that CSM remains a welcoming and safe environment for everyone. In turn, this will help us to offer the best possible service to our clients. We must accept individual differences and beliefs without prejudice – if you feel there is an issue with lack of respect in your team, please reach out to your direct superior or Line Manager, or alternatively use the Open Reporting System.



LOYALTY

Loyalty is "devotion and faithfulness to the Company"

It is built on "trust" and "being trusted", honouring and committing to our employment relationship at all times.

At CSM we value the loyalty of our employees who are the driving force behind our success and expect them to be loyal to the Company. In return, CSM is loyal in its commitment to job security and considers all employees as being part of the wider Columbia Group family, regardless of their location.



COMPETENCE

Competence is the "ability to do something successfully"

It is having the right personality, knowledge, experience, and self-motivation to discharge our responsibilities to the full expectation of the Company and our customers.

The Company expects employees to carry out their duties in a competent manner, by approaching their work with a willingness to learn and deliver. This "can do" attitude paired with hard work has made CSM the Company it is today. Whether you are new to the Columbia Group, or a long-time employee, we expect a consistent level of competence in daily work. Further, if you feel that an individual is incompetent then you must reach out to your superior/or use the Open Reporting System. If you feel you need extra training please raise this with your superior or Line Manager.

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ACCOUNTABILITY

Accountability is the "willingness to assume responsibility"

It includes answering for the consequences of our actions without fear of blame in a just and fair environment.

Accountability means correcting mistakes promptly and voluntarily. Employees and crew at every level are expected to exercise accountability in all aspects of their work – we follow a no blame culture. Accountability, driven by transparency and honesty, creates efficient working practices and will lead to better outcomes in the long term.



PASSION

Passion is "to love and commit to what we do"

Passion is to put our whole mind, heart and strength into whatever we do, but always in a proper manner.

Our founder of the Columbia Group, Mr. Heinrich Schoeller, started Columbia with a passion for excellence. It is the adoption of this same passion by our employees that helped turn CSM into the reputable company that it is today, and what continues to propel us forward. Passion helps us take the extra steps to make sure our quality of work is at its best – because we care about it – and is something we hope our employees are able to find in their jobs.



SUSTAINABILITY

Sustainability is "to commit towards ethical and environmentally-friendly practices"

It means meeting present needs without compromising the ability of future generations to meet their own needs.

CSM is committed to promoting and implementing sustainability locally and globally in the maritime industry. We are morally obliged to preserve the environment in which we live for the benefit of our children and our children's children. In addition, we are professionally obliged to conduct our business in a sustainable and environmentally friendly way. If you believe that there are unsustainable or environmentally damaging practices happening in your work, or that the way we do things could be improved, you must alert your direct superior or Line Manager, or alternatively use the Open Reporting System to notify the Company. You have a duty to do this, not only to your Company, but to the planet and future generations.

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DIVERSITY (AND INCLUSION)

Diversity is "the range of human differences"

It includes, but is not limited to, social identity, gender, age, culture, nationality, ethnicity, physical abilities, political and religious beliefs, sexual orientation, and other attributes. Inclusion is the process of involving, accepting, and valuing all people regardless of their differences and social identity.

At CSM we understand the vital importance of diversity on both a human and business level. We are fortunate to have an increasingly diverse work force both at sea and on land. The net result of this diversity is that we're able to draw on a wealth of experience and cultures in order to complete our work and goals in the best way. Learning from each other's backgrounds and cultures often drives opinion and improves working practices for the better. Any form of discrimination or harassment based on human differences (such as those listed above, as well as disability) will not be tolerated and could lead to dismissal. Diversity makes us stronger as a company. If you believe that anyone is not respecting a colleague based on any aspect of difference, you must alert your direct superior or Line Manager, or alternatively use the Open Reporting System immediately.



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