



# PALM CHARTERS GROUP S.A.



## Palm Charters Quality Management System

### Code of Business Conduct, Ethics & Human Rights

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#### ADDRESS

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This Code is incorporated into all Palm Charters policies and internal control as well as compliance systems and integrated it into all relevant elements of our operations.

## UN Business Principles and Human Rights

We subscribe the UN Business Principles and Human rights and recognize our role as a business enterprise and that, as specialized organs of society performing specialized functions near to potential areas of conflict (Yemen, Sudan, Ethiopia, Syria), we are required and will comply with all applicable laws and to respect human rights.

## Ethics

We always conduct our services honestly and honourably and expect our clients and suppliers to do the same. Palm Charters prohibits offering or receiving bribery in any form, whether direct or indirect.

## **GENERAL COMMITMENTS**

1. We agree to operate in accordance with the principles contained in this Code. Palm Charters requires that the Personnel, and all subcontractors or other parties carrying out Security Services under Palm Charters contracts, operate in accordance with the principles contained in this Code.
2. Our policies intend that the actions of our Personnel always comply with the principles contained herein.
3. Compliance with this Code is an integral part of contractual agreements with Personnel and subcontractors or other parties carrying out Security Services under their contracts.
4. We adhere to this Code, even when the Code is not included in a contractual agreement with a client.
5. We will not, to the best of our knowledge, enter into contracts where performance would directly and materially conflict with the principles of this Code, applicable national or international law, or applicable local, regional and international human rights law, and are not excused by any contractual obligation from complying with this Code. To the maximum extent possible, we will interpret and perform contracts in a manner that is consistent with this Code.



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6. We comply and require our Personnel to comply, with applicable laws, which may include international humanitarian law, and human rights law as imposed upon us by applicable national law, as well as all other applicable international and national law. We exercise due diligence to ensure compliance with the law and with the principles contained in this Code and respects the human rights of persons they come into contact with, including, the rights to freedom of expression, association, and peaceful assembly and against arbitrary or unlawful interference with privacy or deprivation of property.

7. We agree not to contract with, support or service any government, person, or entity in a manner that would be contrary to United Nations Security Council sanctions. We do not, and require that our Personnel do not, participate in, encourage, or seek to benefit from any national or international crimes including but not limited to war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, the trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary executions.

8. We do not, and require that our Personnel do not, invoke contractual obligations, superior orders or exceptional circumstances such as an armed conflict or an imminent armed conflict, a threat to national or international security, internal political instability, or any other public emergency, as a justification for engaging in any of the conduct identified in paragraph 7 of this Code.

9. We report, and require our Personnel to report, known or reasonable suspicion of the commission of any of the acts identified in paragraph 7 of this Code to the Client and one or more of the following: the Competent Authorities in the country where the act took place, the country of nationality of the victim, or the country of nationality of the perpetrator.

10. We will take reasonable steps to ensure that the goods and services we provide are not used to violate human rights law or international humanitarian law, and such goods and services are not derived from such violations.

11. We and our Personnel do not, consistent with applicable national and international law, promise, offer, or give to any public official, directly or indirectly, anything of value for the public official himself or herself or another person or entity, in order that the public official act or refrain from acting in the exercise of his or her official duties if such inducement is illegal. PALM CHARTERS does not, and requires that our Personnel do not, solicit or accept, directly or indirectly, anything of value in exchange for not complying with national and international law and/or standards, or with the principles contained within this Code.

12. Our corporate culture promotes awareness of and adherence by all Personnel to the principles of this Code. We require our Personnel to comply with this Code, which includes providing sufficient training to ensure Personnel are capable of doing so.



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13. We prohibit bribery in any form, whether direct or indirect. All PALM CHARTERS's employees should refrain from offering or receiving money/gifts/benefits/discounts (over 100 EUR or equivalent in local currency), charitable/sponsorship donations (over 3000 EUR or equivalent in local currency), employment opportunities and any consideration that may be interpreted as bribe. The duty of each employee is to report any possible bribery element immediately to our management.



## **SPECIFIC PRINCIPLES REGARDING THE CONDUCT OF OUR PERSONNEL**

### **General Conduct**

14. Palm Charters will treat all persons humanely and with respect for their dignity and privacy and will report any breach of this Code.

### **Detention**

15. Our Personnel will only guard, transport or question detainees if: (a) the Company has been specifically contracted to do so by a state; and (b) its Personnel are trained in the applicable national and international law. We will only treat all detained persons humanely and consistent with their status and protections under applicable human rights law or international humanitarian law, including, in particular, prohibitions on torture or other cruel, inhuman or degrading treatment or punishment.

### **Apprehending Persons**

16. We do not take or hold any persons except when apprehending persons to defend themselves or others against an imminent threat of violence, or following an attack or crime committed by such persons against Palm Charters.

Personnel, or against clients or property under their protection, pending the handover of such detained persons to the Competent Authority at the earliest opportunity. Any such apprehension must be consistent with applicable national or international law and be reported to the Client without delay.

We will treat all apprehended persons humanely and consistent with their status and protections under applicable human rights law or international humanitarian law, including, in particular, prohibitions on torture or other cruel, inhuman or degrading treatment or punishment.

### **Prohibition of Torture or Other Cruel, Inhuman or Degrading Treatment or Punishment**

17. We do not engage in torture or other cruel, inhuman or degrading treatment or punishment. For the avoidance of doubt, torture and other cruel, inhuman or degrading

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treatment or punishment, as referred to here, includes conduct by a private entity which would constitute torture or other cruel, inhuman or degrading treatment or punishment if committed by a public official.

18. Contractual obligations, superior orders or exceptional circumstances such as an armed conflict or an imminent armed conflict, a threat to national or international security, internal political instability, or any other public emergency, can never be a justification for engaging in torture or other cruel, inhuman or degrading treatment or punishment.

19. We will report any acts of torture or other cruel, inhuman or degrading treatment or punishment, known to them, or of which they have reasonable suspicion. Such reports will be made to the Client and one or more of the following: the competent authorities in the country where the acts took place, the country of nationality of the victim, or the country of nationality of the perpetrator.

### **Sexual Exploitation and Abuse or Gender-Based Violence**

20. We do not benefit from, nor allow their Personnel to engage in or benefit from, sexual exploitation (including, for these purposes, prostitution) and abuse or gender-based violence or crimes, either within the Company or externally, including rape, sexual harassment, or any other form of sexual abuse or violence.

We will remain vigilant for all instances of sexual or gender-based violence and, where discovered, report such instances to competent authorities.

### **Human Trafficking**

21. We do not engage in trafficking of persons. We will remain vigilant for all instances of trafficking in persons and, where discovered, report such instances to Competent Authorities. For the purposes of this Code, human trafficking is the recruitment, harbouring, transportation, provision, or obtaining of a person for (1) a commercial sex act induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age; or (2) labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage, or slavery.

### **Prohibition of Slavery and Forced Labour**

22. We do not use slavery, forced or compulsory labour, is complicit in any other entity's use of such labour.

### **Prohibition on the Worst Forms of Child Labour**

23. We respect the rights of children (anyone under the age of 18) to be protected from the worst forms of child labour, including:



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- i. All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in provision of armed services;
- ii. The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- iii. The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs;
- iv. Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.



We will report any instances of the activities referenced above that we know of, or have reasonable suspicion of, to Competent Authorities.

## Discrimination

24. We do not discriminate on grounds of race, colour, sex, religion, social origin, social status, indigenous status, disability, or sexual orientation when hiring Personnel and selects Personnel on the basis of the inherent requirements of the contract.

## Harassment

25. We will not tolerate harassment and abuse of co-workers by our Personnel.

## Identification and Registering

26. To the extent consistent with reasonable security requirements and the safety of civilians, our Personnel and Clients, we:

- i. Require all Personnel to be individually identifiable whenever they are carrying out activities in discharge of their contractual responsibilities;
- ii. Ensure that our vehicles are registered and licensed with the relevant national authorities whenever we are carrying out activities in discharge of our contractual responsibilities; and,
- iii. Ensure that all hazardous materials are registered and licensed with the relevant national authorities.

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