

Code Of Ethics

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For Seanezzi PTY LTD

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Code of Ethics

Seanezzi and its associated companies specialises in the development, design and engineering, and manufacture of composite structures and components.

These items are the result of the hard work and intellect of an eco-system of employees, suppliers and collaborators. We are acutely aware that the company cannot fulfill our commitment to quality, innovation and environmental responsibility without these contributors and their equivalent commitment to our exemplary ethical standards.

To promote growth of ethical standards within our eco system it is our responsibility to keep the prosperity and safety of the constituents that make up that ecosystem robustly sustainable through our application of honest and fair business practices.

Our work in the marine, defence and aerospace industries confronts us with significant challenges in maintaining and promoting our ethical standards. Our material inputs are potentially environmentally hazardous, our manufacturing techniques are energy heavy, our people safety is risk-prone and our manufactured goods are hard to recycle and are open to potentially deadly abuse.

We can strive through policy and procedure to ensure that all those factors are mitigated. We can never completely ensure all parties in our ecosystem adhere to our own high standards – but we must continue to show leadership and remain true to our values.

Economic benefit to the company, or its shareholders, will never be allowed to usurp our ethical standards.

Sean P Managh



Managing Director
Seanezzi PTY Ltd

People

We work with third party factories, and material suppliers. Seanezzi carefully selects business partners whose values are compatible with our own. We are as committed to the wellbeing of our suppliers' workforces, ethics and environmental standards as we are to our own.

Seanezzi carefully monitors the practices of individual business partners, employees and the social/political and environmental issues that affect the workforces in those facilities.

Seanezzi only works with partners who share our commitment to the human rights of individuals employed across the entire production process. We undertake specific due diligence, to ensure that no partner deviates from those values.

Seanezzi considers a safe and healthy work environment to be a basic human right. We expect our partners to be law-abiding corporate entities, managed by law-abiding individuals. They must comply with all legal requirements relevant to the conduct of their business.

In addition, each of our business partners must adhere to the following:

- they must provide wages, and benefits, to their employees, which comply with all applicable laws and prevailing local industry practices, and;
- they undertake to never employ children (people under 16 years of age). Furthermore, our business partners will not knowingly utilise subcontractors, or raw materials suppliers, who permit the use of child labour in any of their facilities.

Seanezzi actively supports the development of legitimate workplace apprenticeships and training programmes for the educational benefit of younger or disadvantaged people.

We will never knowingly utilise partners who permit the use of prison labour in the manufacture of products used in our supply chain. Partners must not knowingly subcontract, or source raw materials, from those who permit the use of forced labour in their facilities.

Seanezzi recognises and respects 'differences'. However, we strongly believe that workers are employed based on their skill to do the job, rather than their gender, age, identity, physical ability, racial characteristics, cultural practice or religious belief.

Seanezzi constantly monitors compliance of these practices. We regularly review commercial relationships and will terminate those with any partner found to be in violation of the expected standards.

Seanezzi has always taken a proactive approach to environmental and health issues. All new products adhere to the latest environmental standards issued by governments and international bodies. In many cases, we are at the vanguard of new standards, often before they become law.

Seanezzi only engages with partners who share this commitment to protect the environment. This includes compliance with national laws and international standards. Our stringent compliance processes ensure all products, and business partners, fully comply with latest regulations.

Seanezzi seeks to strengthen the integrity of a procurement system that encourages competition, rewards technical innovation and fosters local design and manufacture. We operate our businesses from a foundation of ethical responsiveness where economic pursuits do not overtake our responsibility to the environment and wider community.

Our actions should contribute to the common good of our industry and promote industry ethics whenever and wherever possible by sharing best practices in ethics and business conduct.

Business practices

We have effective mechanisms of control over employees and agents operating on our behalf at home and overseas to ensure ethical conduct and full compliance with local and international law.

We will protect Australian national security when performing contracts with foreign parties by committing to compliance with any and all export control regimes, and with all anti-boycott and embargo requirements.

Seanezzi considers integrity our primary business asset. It is not a buzz word or catch phrase required to satisfy regulators. Ethics compliance is integral to all aspects of our corporate life and culture, including employee appraisals and promotions. We foster an environment where everyone aspires to do the right thing – especially where no one is watching.

We regularly review company best practices with input from all levels of the business and ecosystem and demonstrate our commitment to ethics by making the Managing Director the top ethics officer.

All our employees and business partners know to report suspected violations of the Code of Ethics without fear of retribution. Where appropriate our people know to promptly and effectively communicate violations to the government or regulator.

Seanezzi will ensure prompt and appropriate corrective action; and conspicuously respond by rewarding exemplary conduct and disciplining ethical lapses.

Operating to the highest ethical standards benefits all companies and society as a whole. The Company's long term success depends on all actors upholding integrity in bidding, negotiating and performing of contracts. We will play our part by behaving ethically towards our customers, suppliers, competitors, employees, and other stakeholders, and hold to account those that we see not doing so.

Seanezzi has zero tolerance to corruption.

We will comply fully with all antibribery laws applicable to the conduct of our business, such as the U.S. Foreign Corrupt Practices Act ("FCPA") and those laws enacted pursuant to International Conventions (including, but not limited to, the 1997 OECD Convention and the 2003 United Nations Convention Against Corruption ("UNCAC")).

We will never offer, promise, or provide any monetary payment, gifts, hospitality, or political contributions or charitable donations, to public officials, political parties or political candidates or to any private party, in order to obtain or retain business or gain any other improper advantage in the conduct of our business.

We will make our business partners advisors, majority-owned joint venture entities, subcontractors and suppliers, aware of the integrity policies of the company, and require them to refrain from offering, promising or providing (directly or indirectly) any improper payments.

We will never offer or pay facilitation payments.

Advisors include agents, consultants, or intermediaries engaged to assist in developing, expanding or maintaining our business shall never be paid in cash or crypto currency.

Seanezzi shall keep proprietary information of third parties to which we have gained access in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

We will never solicit or accept a third party's proprietary information (whether provided by a customer or otherwise), such as bid and proposal information, or technical or price data, unless the owner of the data has agreed to its release.

We will follow all applicable laws, regulations and directives concerning the employment or engagement of public officials including those dealing with conflicts of interest.

The environment

At Seanezzi environmental sustainability is central to our lives and our work. Many of our people are life-long sailors and aviators. Understanding of, commitment to, and respect for the environment is core to who we are and what we stand for.

As a minimum Seanezzi complies with ISO14001:2015 standards.

Our business is energy and chemical heavy and often creates products that are environmentally unsustainable. Wherever possible, through supplier selection, materials innovation, design and manufacturing evolution and waste management choices we strive to reduce our footprint. Seanezzi is committed to improving its environmental performance and reducing its contribution to climate change and environmental degradation.

Seanezzi commits to the following principles and practices:

- Fostering the sustainable use of resources by “treading lightly” on the land.
- Managing, monitoring and measuring environmental performance and establishing objectives and targets to minimise these impacts.
- Reducing the consumption of resources associated with operations.
- Minimising the production of greenhouse gases associated with energy consumption.
- Minimising waste production and maximising the amount reused and recycled.
- Considering environmental aspects in the procurement of products and services.
- New capital works programs incorporate environmental sustainability principles.
All staff have a responsibility to assist the company to meet the commitments in this policy.
- Complying with relevant Commonwealth and State Government environmental policy, practices, regulations and legislation.