

Social Responsibility Policy

1 INTRODUCTION

- 1.1 This policy (the “**Policy**”) sets out the approach of V.Group to social responsibility.
- 1.2 This Policy:
- (a) forms part of V.Group’s Compliance & Ethics Policies which are available at <https://vgrouplimited.com/legal/compliance/>;
 - (b) applies to all Colleagues;
 - (c) has been approved by the Head of Internal Communications of V.Group; and
 - (d) may be amended by V.Group at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated by the version number.
- 1.3 Any breach of this Policy will be taken seriously and may result in disciplinary action.
- 1.4 Any questions or concerns about the operation of this Policy, including whether this Policy has been followed, should be referred to Group Communications by contacting comms@vgrouplimited.com

2 DEFINITIONS

- 2.1 “**Colleague**” means any employee of V.Group;
- “**Group Communications**” means the communications function of V.Group (which may be contacted via comms@vgrouplimited.com); and
- “**V.Group**” means Vouvray Acquisition Ltd and its subsidiaries and/or affiliates.
- 2.2 Words denoting the singular shall include the plural and vice versa.

3 WHAT IS SOCIAL RESPONSIBILITY?

- 3.1 V.Group attaches great importance to the pursuit of excellence as a corporate citizen to meet and exceed ethical and legal expectations. Most important is our goal to build trust among stakeholders and between V.Group and the countries in which it operates. To achieve this, V.Group works in partnership with our Colleagues, stakeholders, customers, suppliers and local communities.

4 PRINCIPLES

- 4.1 V.Group follows the following principles to promote social responsibility:
- (a) safety and welfare of our Colleagues ashore and at sea;
 - (b) protection of the environment;
 - (c) accountability to our shareholders;

- (d) accountability to our customers;
- (e) accountability to the communities where we work; and
- (f) support for those who need our help.

5 NUMBER ONE RESPONSIBILITY

5.1 Ashore or at sea, people are V.Group's number one responsibility and the key to success. As such, V.Group has high standards for attracting and retaining talented people. We are committed to ensuring compliance with all legal, compliance and ethics policies in support of this.

6 SEAFARER'S CHARTER

6.1 Our Seafarer's Charter puts V.Group on record as a firm supporter of seafarers' rights including high standards for health, safety and well-being, competitive compensation and maintenance of a constructive open dialogue with our Crewing function.

7 HEALTH, SAFETY, ENVIRONMENT & QUALITY (HSEQ)

7.1 Risk management

- (a) V.Group's portfolio of companies provides high quality support services to the international shipping, energy and wider transport industries. These services add value to both internal and external customers through effective risk and HSEQ management ensuring effective controls, regulatory compliance and a pro-active HSEQ culture that assist in controlling costs and enabling focus on core activities.
- (b) Effective risk management requires the business to optimise its performance by understanding the threats to success and the opportunities for improved performance, and correctly managing the overall exposure to risk to provide stakeholder confidence and reward in the form of company profits.
- (c) Effective HSEQ management requires that management be fully committed to a strong HSEQ culture, adopt a visible leadership role and believe that their actions and attitude demonstrates that where a conflict arises safety will take priority. V.Group's senior management are committed to the establishment of a corporate approach to risk and HSEQ management that allows all employees to manage risk, HSEQ issues and to realise opportunities as part of their day to day responsibilities.

7.2 Safety

- (a) All Colleagues are empowered to stop any work that is unsafe, unhealthy or could result in property damage or an adverse impact on the environment.
- (b) V.Group's HSEQ performance standards are designed to ensure that the operations and activities are performed in accordance with the requirements of V.Group's policies, standards, procedures and guidelines while also encouraging and ensuring continuous improvement in HSEQ performance.

- (c) V.Group records all accidents and/or near misses and investigates these to determine if a preventative action is required to prevent further accidents. Where appropriate, V.Group shares lessons learned from accidents with industry partners in the interests of wider seafarer safety.

7.3 Environment

- (a) V.Group understands that its activities affect the environment and the communities where we operate. We believe we have responsibility for identifying and managing the impacts as effectively as possible and are committed to improving our environmental performance and moving towards best practices in corporate sustainability.
- (b) The HSEQ function is responsible for ensuring compliance with industry best practice beyond the minimum legal obligations, and driving continuous improvement.

8 ACTIVITIES IN THE COMMUNITY

- 8.1** V.Group is committed to the communities in which we operate and actively provides support to local initiatives.

9 CHARITABLE DONATIONS

- 9.1** Each of our offices provide support to marine related charities through self-funded local initiatives such as dress down days or locally organised events.

10 FAIR EMPLOYMENT

- 10.1** V.Group's employment policies and practices support overall business objectives by motivating and developing employees to meet the requirements of its business and customers. Policies continue to be reviewed and developed to support the changing needs and international nature of our business.

11 EQUAL OPPORTUNITIES

- 11.1** V.Group is an equal opportunities employer and is committed to promoting equal opportunities in all aspects of its work and employee relations.
- 11.2** In particular, an employee or potential employee will not be treated less favourably on grounds of race, colour, nationality, ethnic or national origins, sex, sexual orientation, marital status, age, disability, religion or belief.
- 11.3** V.Group wholeheartedly supports the principle of equal opportunities in employment and opposes all forms of unlawful discrimination, harassment or bullying.
- 11.4** Our business operates in many different areas. Wherever possible and within the framework of the law, the skills and talents available throughout the community will be considered when employment opportunities arise. Our commitment is to have a workforce that broadly reflects the local and/or national community.

11.5 All possible steps will be taken to ensure that individuals are treated equally and fairly. Decisions on recruitment, selection, career development, training, promotion, retirement, redundancy pay and benefits, and general terms and conditions of employment are based only on objective criteria.

12 EMPLOYEE BENEFITS

12.1 V.Group recognises that to attract, retain and engage employees we must seek to offer a variety of benefits to potential and current employees. There are 2 types of benefits available:

- (a) core benefits which are available to all employees; and
- (b) optional benefits which are also available to all employees but whereby the employee chooses whether to opt for one of these benefits depending on their personal circumstances.

13 RELEVANT POLICIES

13.1 V.Group has in place the following relevant policies:

- (a) a Grievance Policy and a Dignity at Work Policy. If you want to raise an issue relating to your individual employment, feel you are being bullied or harassed, please consult these policies as appropriate. Please contact your line manager or Group HR for advice; and
- (b) V.Group has in place a Risk Management Policy which is available at <https://vgrouplimited.com/legal/compliance/>

14 INTERNAL REPORTING

14.1 You must immediately contact Group Communications if there is any actual or suspected breach of this Policy.

15 DOCUMENT CONTROL

15.1 The Head of Internal Communications of V.Group is the owner of this Policy and is responsible for ensuring that it is reviewed in line with the relevant review requirements.

15.2 A current version of this Policy is available at <https://vgrouplimited.com/legal/compliance/>

15.3 This Policy was approved as stated in this Paragraph and is issued on a version-controlled basis.

Version	Date of Issue	Approved by	Position
1	30.09.2019	Gary Williams	Head of Internal Communications