



BlackSea Technologies

Code of Conduct

Integrity at Every Level



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Message from Leadership

At **BlackSea Technologies**, we are committed to conducting business with integrity, accountability, and respect. This **Code of Conduct** serves as a guide to ensure we uphold the highest ethical standards in every decision and action.

Whether you are an employee, officer, contractor, or business partner, you are expected to adhere to this Code. Ethical behavior is not just about compliance, it's about fostering trust, maintaining our reputation, and ensuring long-term success.

If you see something, say something. Reporting concerns in good faith protects BlackSea and strengthens our culture of integrity. **Retaliation against those who report in good faith will not be tolerated.**

Together, we will continue to navigate challenges responsibly, ensuring BlackSea remains a leader in our industry.



Our Core Values – The BlackSea Standard

We are guided by six fundamental values:

- **Integrity** – We act ethically and honestly, even when no one is watching.
- **Accountability** – We take responsibility for our actions and decisions.
- **Collaboration** – We work together to drive innovation and success.
- **Respect** – We treat everyone with fairness and dignity.
- **Excellence** – We set high standards and continuously strive to improve.
- **Safety & Compliance** – We follow all laws, regulations, and policies to maintain operational and ethical stability.

These values keep BLACKSEA steady, ensuring we operate responsibly and successfully in a competitive landscape. For detailed policies, procedures, and expectations regarding employment, workplace conduct, and compliance, please refer to the BLACKSEA Employee Handbook. *The Employee Handbook serves as the primary resource for specific guidelines and enforcement of the principles outlined in this Code of Conduct.*

Understanding the Code

This **Code of Conduct** is a framework for ethical decision-making. While it cannot cover every situation, it provides principles to guide us in acting lawfully, responsibly, and in BLACKSEA's best interests.

Who Must Follow the Code?

This Code applies to **all employees, contractors, officers, and business partners** working with or on behalf of BLACKSEA.

Our Responsibilities

- Understand and follow **the Code, BLACKSEA policies, and applicable laws.**
- **Report concerns** about unethical behavior, violations, or non-compliance.
- **Lead by example**, ensuring ethical behavior is part of our daily operations.

Leadership's Role

- **Set the tone** for ethical behavior.
- **Encourage open communication** and a speak-up culture.
- **Ensure compliance** with laws and company policies.



Ethical Business Practices

Anti-Bribery & Corruption

BLACKSEA's success is built on **trust and integrity**—never through bribery or corruption. We:

- **Never offer or accept** bribes, kickbacks, or anything of value to gain business.
- **Follow all anti-corruption laws**, including the Foreign Corrupt Practices Act.
- **Accurately record all transactions** and maintain transparent financial records.
- **Partner only with ethical businesses** that share our commitment to integrity.

Fair Competition & Antitrust Compliance

BLACKSEA competes based on merit, not manipulation. We:

- **Do not engage in collusion, price-fixing, or bid-rigging.**
- **Gather competitive intelligence legally and ethically.**
- **Comply with antitrust and trade regulations** in all markets.

Avoiding Conflicts of Interest

Conflicts of interest can **compromise decision-making and credibility**. To prevent them:

- **Disclose potential conflicts** to management.
- **Do not use BLACKSEA resources** for personal gain.
- **Avoid gifts, favors, or relationships** that could improperly influence decisions.

Accurate Records & Financial Integrity

Maintaining **truthful records** is essential to accountability. We:

- **Ensure all transactions are documented accurately.**
- **Follow strict accounting and reporting policies.**
- **Never create off-the-books accounts or misrepresent financial data.**

Global Trade Compliance

BLACKSEA follows all **international trade laws**, including:

- **Export and import regulations.**
- **U.S. anti-boycott laws.**
- **Sanctions and embargo compliance.**



Respecting People & the Workplace

BLACKSEA values **diverse perspectives and experiences**. We:

- **Prohibit discrimination based on protected characteristics.**
- **Ensure hiring and promotions are based on merit.**
- **Provide reasonable accommodations when needed.**

Harassment-Free Workplace

Harassment, intimidation, and discrimination are not tolerated. We:

- **Do not engage in offensive, degrading, or hostile behavior.**
- **Encourage employees to report concerns** without fear of retaliation.
- **Investigate all complaints fairly and confidentially.**

Health & Safety

Safety is a **core responsibility** for all employees. We:

- **Follow safety regulations and procedures.**
- **Report hazards or unsafe conditions immediately.**
- **Maintain a drug-free and violence-free workplace.**

Human Rights & Fair Labor Practices

BLACKSEA upholds **human rights and ethical labor practices**. We:

- **Prohibit child labor, forced labor, and human trafficking.**
- **Ensure fair wages and safe working conditions.**
- **Expect suppliers to uphold the same standards.**



Protecting BLACKSEA & Its Assets

Confidentiality & Intellectual Property

We safeguard **BLACKSEA's intellectual property and confidential information**. Employees must:

- **Share proprietary information only with authorized individuals.**
- **Respect third-party intellectual property rights.**
- **Report any suspected data breaches immediately.**

Data Privacy & Cybersecurity

Protecting sensitive data is critical. We:

- **Limit data collection to legitimate business purposes.**
- **Follow cybersecurity and privacy laws.**
- **Ensure third-party vendors meet BLACKSEA's security standards.**

Insider Trading

Using **non-public company information** for personal financial gain is illegal. Employees must:

- **Never trade stocks or securities** based on confidential information gained at BLACKSEA.
- **Avoid sharing inside information** with others.



Corporate Citizenship & Responsibility

Environmental Responsibility

BLACKSEA is committed to **sustainable practices**. We:

- **Comply with all environmental laws and regulations.**
- **Reduce waste and energy consumption.**
- **Expect suppliers to follow environmental standards.**

Engaging in the Political Process

Employees may engage in **personal political activities**, but:

- **Do not use BLACKSEA resources for political contributions.**
- **Ensure any personal views are not expressed as if they are the views of BLACKSEA**
- **Ensure lobbying efforts comply with legal requirements.**



Reporting Concerns & Enforcement

Raising Concerns

Employees are encouraged to report **ethical concerns, policy violations, or illegal activity** through:

- **Supervisors or Managers**
- **Human Resources**
- **BLACKSEA Ethics Officer**

No Retaliation Policy

BLACKSEA strictly **prohibits retaliation** against anyone who raises a concern in good faith. Retaliation may result in **disciplinary action, including termination**.

Investigations & Consequences

If a violation occurs, BLACKSEA will:

- **Investigate fairly and confidentially.**
- **Take corrective actions**, which may include training, warnings, or termination.
- **Report illegal activities to authorities** when required.