

SAFE HARBOR™

SUPPLIER & VENDOR CODE OF BUSINESS CONDUCT

Effective Date: April 10, 2026

INTRODUCTION

Safe Harbor Marinas, LLC, together with each of its subsidiaries and affiliates (collectively, “Safe Harbor” or the “Company”), is a steward of some of Earth’s most precious natural resources. Honesty, integrity, professionalism, and an ethical approach are at the forefront of our operations. In turn, we expect our Suppliers and vendors to uphold the same standards.

PURPOSE AND APPLICABILITY

Safe Harbor’s Supplier & Vendor Code of Business Conduct (the “Code”) explains how we expect any individual or entity that supplies raw materials, components, finished products, or services to, or on behalf of, any member of the Safe Harbor group (each, a “Supplier”) to work with us to fulfill that purpose ethically and in compliance with applicable laws.

When selecting our Suppliers and extending an existing business relationship, we consider the expectations imposed by this Code. Suppliers are expected to establish appropriate controls and management systems to enable these standards to be met. Suppliers are also expected to monitor and confirm their compliance with this Code. Suppliers are further expected to communicate the principles of this Code throughout their own supply chains and to ensure that their contractors, subcontractors, agents, suppliers, and other business partners adhere to standards consistent with those set forth herein.

SECTION 1: PEOPLE FIRST

FAIR TREATMENT AND WORKING CONDITIONS

We expect our Suppliers to treat their workers fairly and provide suitable working conditions, including working hours, wages, and benefits, which comply with applicable international, national, and local law.

NON-DISCRIMINATION

We expect our Suppliers to not discriminate against any worker, sub-supplier, or contractor based on ethnicity, religion, age, gender, race, national origin, disability, sexual orientation, gender identity, or any other status protected by the laws of the relevant country.

RESPECT AND DIGNITY IN THE WORKPLACE

We expect our Suppliers to promote a culture of respect and fairness, and also not tolerate any discrimination, harassment, intimidation, bullying, retaliation, or any other form of abusive behavior in the workplace.



EMPLOYMENT, CHILD LABOR, FORCED LABOR AND HUMAN TRAFFICKING

We expect our Suppliers to follow all applicable employment, human rights, and child labor laws and to not engage in or tolerate any form of forced, compulsory, or illegal labor, human trafficking, or bonded labor. We also expect our Suppliers to exercise appropriate due diligence to ensure that this does not occur in any part of their supply chain.

We also expect our Suppliers to not engage in any practices that restrict the free movement of workers, for example by requiring the handover of identification documents such as passports.

FREEDOM OF ASSOCIATION

We expect our Suppliers to respect the rights of their workers to associate freely and bargain collectively in accordance with local laws.

SECTION 2: HEALTH, SAFETY, EXPERIENCE, AND THE ENVIRONMENT

SAFE AND HEALTHY WORKING ENVIRONMENT

We expect our Suppliers to provide a safe and healthy work environment for all employees and others who visit or work at their facilities and job sites. This includes implementing appropriate safety training programs, maintaining proper safeguards on machinery and equipment, providing necessary personal protective equipment, and ensuring adequate ventilation, lighting, and sanitation.

EXPERIENCE AND TRAINING

We expect our Suppliers to have the necessary skills, experience, supervision, professionalism, and dependability (with respect to time and budget) that is appropriate for the relevant project. Suppliers must ensure all employees have the required skills and certifications to perform assigned work.

INSURANCE

We expect our Suppliers to be adequately insured by maintaining sufficient lines of insurance issued by duly licensed insurance companies. If required by law, Suppliers must maintain worker's compensation insurance and/or USL&H. Suppliers should avoid lapses in insurance and be able to provide Safe Harbor with a current COI upon request.

EMERGENCY PREPAREDNESS

We expect our Suppliers to identify and assess potential emergency situations at their facilities and to develop and implement emergency plans and response procedures that minimize harm to life, the environment, and property. This includes maintaining appropriate fire detection and suppression equipment, clearly marked and unobstructed emergency exits, and conducting regular emergency drills.



ENVIRONMENTAL STEWARDSHIP

We expect our Suppliers to demonstrate a clear understanding of the environmental risks and impacts associated with the products and services provided to Safe Harbor and to take reasonable steps to monitor and minimize negative environmental impact. This can include, but is not limited to, implementing practices to reduce greenhouse gas emissions, conserve water and energy, minimize waste through reduction, reuse, and recycling, and responsibly manage hazardous materials and chemicals. We expect our Suppliers to actively participate in measuring, managing, and reporting their environmental risks and impacts through use of and/or alignment with globally recognized sustainability reporting frameworks, potentially including but not limited to GRI, ISSB, TCFD, GRESB, the GHG Protocol/ISO (emissions only), voluntary CDP disclosures, or other similar resources focused on environment protections and sustainability. Upon request, Suppliers should be prepared to provide information on sustainability KPIs, targets and performance.

We expect our Suppliers to maintain, in accordance with their conditions, all required environmental permits, approvals, and registrations.

RESPONSIBLE SOURCING

We expect our Suppliers to exercise due diligence in the sourcing of raw materials and components to ensure they are obtained responsibly and ethically. Suppliers are expected to have policies and practices in place to identify and mitigate risks related to conflict minerals and other materials sourced from high-risk areas. Upon request, Suppliers should be prepared to provide information regarding the origin and/or certification of materials used in products supplied to Safe Harbor.

SECTION 3: OPERATING ETHICALLY

LEGAL COMPLIANCE

We expect our Suppliers to comply with all applicable laws and conduct their business with the utmost integrity and good faith.

SANCTIONS AND IMPORT AND EXPORT CONTROLS

We expect our Suppliers to comply with local, national, and international sanctions, laws, and regulations and not engage in or cause Safe Harbor to engage in any form of sanction breaches. Safe Harbor strictly prohibits any direct or indirect involvement in transactions, business relationships, or activities that would violate sanctions or import and export controls. Safe Harbor also strictly prohibits any direct or indirect involvement in any arrangement intended to evade or circumvent sanctions or import & export controls.

ANTI-BRIBERY AND ANTI-CORRUPTION

We expect our Suppliers to not request, accept, receive, pay, or authorize any bribes whatsoever, whether directly or indirectly. A bribe can be anything of value, not just money.



ANTI-BRIBERY AND ANTI-CORRUPTION (CONTINUED)

Safe Harbor does not tolerate any form of bribery or corruption. Safe Harbor's zero-tolerance approach applies equally to all applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and any local legislation in the jurisdictions where the Company operates.

GIFTS AND ENTERTAINMENT

We expect Suppliers to not offer a gift or entertainment to Safe Harbor personnel unless it is modest in value, has a genuine business purpose, complies with Safe Harbor policy, and is not made with the intent or appearance to improperly influence Safe Harbor business decisions.

We expect our Suppliers to not directly or indirectly offer, give, or receive gifts, travel, or entertainment to any public official on behalf of Safe Harbor.

ANTI-FRAUD AND ANTI-MONEY LAUNDERING

Safe Harbor maintains a zero-tolerance approach to fraud and tax evasion in any form. We expect that our Suppliers will not engage in, facilitate, or conceal fraudulent activity or tax evasion, whether for personal gain, to benefit the Company, or for the advantage of a third party.

Safe Harbor also strictly prohibits any involvement in money laundering, terrorist financing, or the facilitation of transactions with sanctioned individuals, entities, or jurisdictions. We expect that our Suppliers will not knowingly or recklessly participate in, assist, or enable any transaction that involves the proceeds of crime or is intended to disguise the true origin or ownership of funds.

FAIR COMPETITION

We expect our Suppliers to conduct their business in line with the principles of fair competition and in accordance with all applicable competition and anti-trust laws.

We also expect Suppliers to not disclose any price, cost, or other competitive information regarding Safe Harbor and also expect Suppliers to not engage in any collusive conduct with any third party with respect to any proposed, pending, or current Safe Harbor transaction.

CONFLICTS OF INTEREST

Suppliers are expected to avoid a conflict of interest with Safe Harbor and, if a conflict of interest should arise, notify Safe Harbor immediately. A conflict of interest is any situation where private interests interfere, or appear to interfere, with the business interests of Safe Harbor. Suppliers are expected to use good judgment and avoid situations that can lead to even the appearance of a conflict with Safe Harbor.

SUPPLY CHAIN DUE DILIGENCE

Suppliers are expected to perform effective due diligence on their supply chain to ensure that the standards set out in this Code are met.



AUDIT AND MONITORING COMPLIANCE

We expect our Suppliers to fully cooperate with any reasonable requests from Safe Harbor for data, information, certifications, and audit access to verify compliance with the Code.

SECTION 4: ACCURATE RECORDS AND FINANCIAL INTEGRITY

Suppliers are expected to ensure that all records, reports, and invoices relating to Safe Harbor business are complete, accurate, and not misleading. Suppliers are expected to ensure that all payments to and transactions with Safe Harbor are supported by sufficient detail to reflect the true nature and purpose of the payment.

SECTION 5: CONFIDENTIALITY AND DATA PROTECTION

PROTECTING CONFIDENTIAL INFORMATION

Suppliers are expected to have in place and maintain appropriate measures to ensure the security, integrity, and availability of information assets relating to business with Safe Harbor and to prevent the unauthorized or unlawful processing of such information assets.

PERSONAL DATA PROTECTION

Suppliers who process personally identifiable data are expected to follow all applicable requirements for the protection of that information and use it only when lawful and to the extent necessary to fulfill legitimate business purposes. Such Suppliers are expected to maintain adequate procedures, controls, and security measures in compliance with all applicable regulations, e.g., SOC 2, the GDPR, and ISO/IEC 27001. Further, such Suppliers are expected to work in good faith in the formation of data processing agreements and addendums with Safe Harbor and ensure diligence in compliance with the same.

USE OF SAFE HARBOR ASSETS AND INTELLECTUAL PROPERTY

Suppliers must only use the assets of Safe Harbor and its stakeholders when authorized to do so and for the purpose originally intended. Suppliers must not tolerate theft of Safe Harbor assets.

Suppliers must also respect the intellectual property rights of Safe Harbor and must not use the Safe Harbor name and/or logo without prior written consent from a duly authorized Safe Harbor representative.

Suppliers must also respect patents, trademarks, copyrights, proprietary information, or trade secrets, as well as the confidentiality of anyone Safe Harbor does business with. Suppliers must adhere to Safe Harbor's non-disclosure agreements and take measures to ensure confidentiality is maintained throughout their supply chain networks.



SECTION 6: ACCURATE RECORDS AND FINANCIAL INTEGRITY

SPEAKING UP

Safe Harbor Marinas is an organization with strong values of responsibility and integrity. We expect our Suppliers to follow the spirit of the law and act ethically and responsibly in all situations.

If a Supplier sees or suspects any illegal or unethical behavior in connection with Safe Harbor business, or has a question about what to do, we encourage Suppliers to speak up and ask for help. We encourage open communication with Safe Harbor teammates if possible. If that is not possible, please use our Ethics Point Hotline online at <https://shmarinas.ethicspoint.com> or by calling (844) 680-3971 (toll-free within the United States, Guam, Puerto Rico, and Canada), 0801 13 01 83 (toll-free within France), or 80093979 (toll-free within Monaco). Our Ethics Point Hotline is available 24 hours a day, seven days a week, 365 days a year, and allows for confidential and anonymous reporting.

For legal matters, please contact legal@shmarinas.com.

NON-RETALIATION

Safe Harbor forbids retaliation against any Supplier reporting a concern in good faith or that assists in an investigation of suspected wrongdoing.

INVESTIGATION AND RESPONSE

All reports of alleged breaches of this Code will be investigated. Suppliers are expected to fully and truthfully cooperate in Company investigations. Substantiated violations by Suppliers may result in disciplinary measures, including termination of the supplier relationship, or any other action Safe Harbor may determine appropriate.

