

DO IT RIGHT.

Code of Business Conduct

Our commitment to conducting business lawfully, ethically, safely and professionally.

BLACKFIN

ENGINEERING · INTEGRITY · ASSURANCE

BLACKFIN

CODE OF BUSINESS CONDUCT

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Trusted with the hard part.



1.0

Purpose and commitment

The Blackfin Group (Blackfin) is committed to conducting business lawfully, ethically, safely and professionally. Integrity, independence, competence and accountability govern how we serve clients, work with colleagues, engage suppliers and make decisions.

This Code of Business Conduct (Code) establishes Blackfin's minimum requirements for ethical conduct and is supported by detailed policies, procedures and contractual obligations.

No business opportunity, schedule pressure, commercial target or direction from another person justifies unlawful conduct, falsification, retaliation or concealment of a material safety or technical concern.

OUR CORE PRINCIPLES

The principles behind this Code

Service
Listen. Respond. Deliver.
We put our clients first. We listen, understand what matters, and follow through with responsive, reliable service that earns trust.

Excellence
Do it right.
We hold ourselves to a high standard of technical rigor, quality, safety, and integrity. Every project matters, and every detail counts.

Innovation
Make it better.
We stay curious, challenge convention, and continuously look for smarter ways to work. We use technology, experience, and new ideas to simplify problems and improve outcomes.

Collaboration
Win together.
We bring the right people and perspectives together. We communicate openly, respect each other's expertise, and work as one team with our clients and partners.

Accountability
Own it.
We keep our commitments and take responsibility for the outcome. We communicate clearly, address problems directly, and see the job through.

2.0

Scope, hierarchy and responsibilities

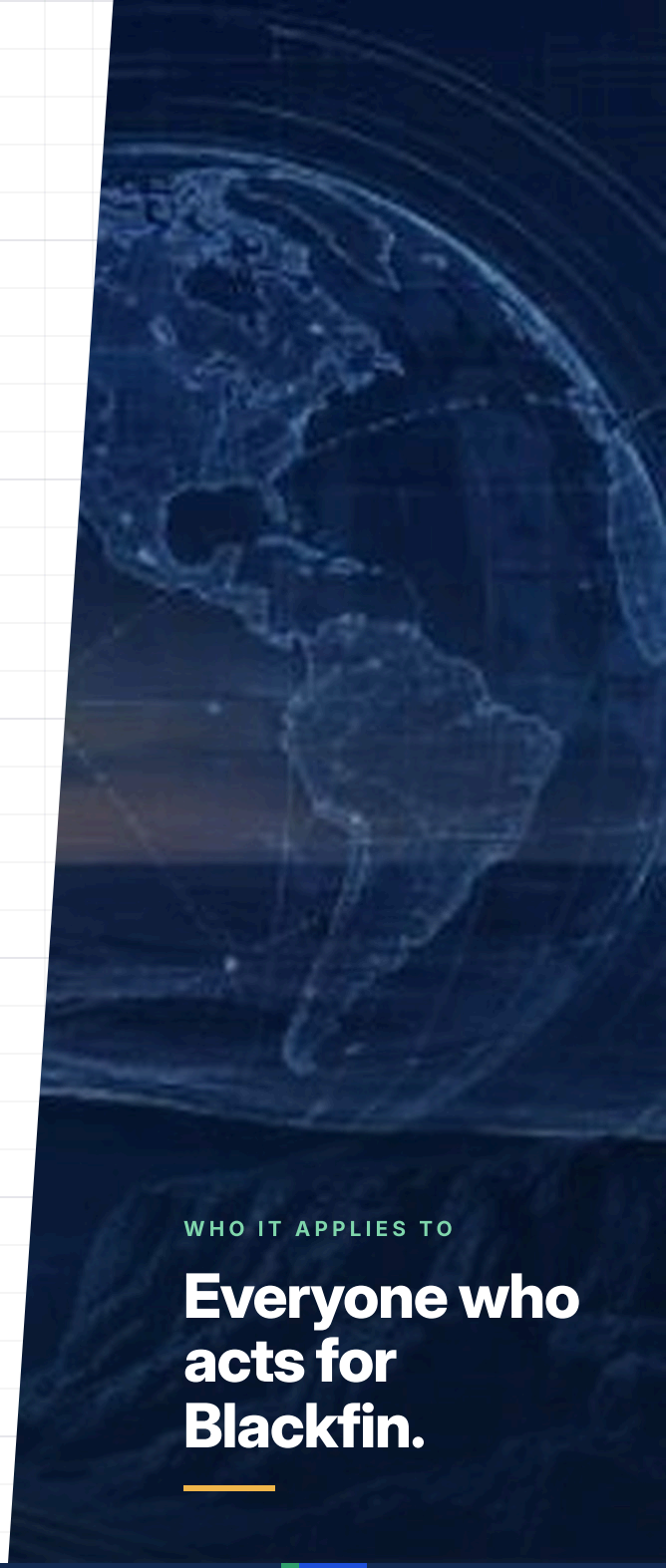
- This Code applies to Blackfin directors, officers, employees, temporary workers and individuals acting on Blackfin's behalf, to the extent appropriate to their engagements.
- Third parties engaged by Blackfin are subject to the Supplier Code of Business Conduct and relevant contractual conditions; personnel acting as Blackfin representatives must also observe this Code where applicable.
- Applicable laws and contractual requirements must be followed. Where requirements differ, personnel should seek guidance before proceeding; no clause authorizes a breach of law.
- The Chief Executive Officer and leadership are accountable for tone, resources and oversight. Managers must demonstrate ethical conduct, identify risks and address reported concerns. Individuals are responsible for reading, following and raising concerns under this Code.
- The Director of Governance, Risk and Assurance (Director GRA) maintains this Code and coordinates periodic review, training expectations, reporting and documented improvements.

3.0

Compliance with law and honest business conduct

All personnel must comply with applicable laws, permits, professional duties and binding contractual requirements, including relevant anti-corruption, competition, employment, safety, environmental, privacy, sanctions and trade laws. Dealings with clients, public authorities, competitors, employees and suppliers must be truthful and fair.

Blackfin prohibits fraud, dishonesty, deliberate misrepresentation, obstruction of lawful reviews and creation of misleading business records.



WHO IT APPLIES TO

Everyone who acts for Blackfin.

Business won on merit.



4.0

Anti-bribery, corruption and improper influence

Blackfin prohibits offering, promising, giving, requesting or accepting bribes, kickbacks or improper advantages, directly or through intermediaries. Personnel must not use donations, sponsorships, commissions, personal benefits or third parties to disguise an improper payment.

Gifts, meals, hospitality and travel must be lawful, reasonable, transparent, infrequent and unrelated to influencing a business decision.

- Lawful
- Reasonable
- Transparent
- Infrequent
- No influence on decisions

Gifts or hospitality involving public officials, procurement decisions or active tenders require heightened scrutiny and documented approval under the applicable company process. Where no specific process applies, seek written approval from the CEO or a delegated authority before offering or accepting anything beyond nominal hospitality.

5.0

Conflicts of interest and independence

Personnel must identify and promptly disclose actual, potential or perceived conflicts involving personal, financial, family, outside-employment or other interests. Affected persons must not participate in associated selection, evaluation, approval or assurance decisions until the conflict has been assessed and managed by an independent authority. Disclosures and decisions must be documented.

1. **Disclose**
   Raise actual, potential or perceived conflicts promptly.
2. **Step back**
   Take no part in related decisions until the conflict is assessed.
3. **Document**
   Record the disclosure and the decision made.



TECHNICAL INTEGRITY

Every detail counts.

6.0

Technical competence, professional integrity and objective assurance

All personnel shall:

Take on only what we can deliver

Accept assignments only where Blackfin and assigned personnel possess, or can secure, the appropriate competence, resources, authorization and independent oversight.

Use sound methods

Use appropriate standards, verified evidence, competent professional judgment and approved methods. Do not certify, approve or sign work outside authorized competence.

Keep data honest

Do not fabricate, suppress, backdate or manipulate data, calculations, inspection results, audit findings, qualifications, time records or document approvals.

Stay impartial

Maintain impartiality in audits and assurance engagements. Disclose independence threats; do not permit commercial pressure, client preferences or management instruction to predetermine findings.

Escalate early

Escalate material nonconformities, safety-critical concerns and unresolved technical disagreements promptly. Preserve relevant evidence and follow applicable stop-work and escalation processes.

Respect licensing

Respect professional licensing and jurisdiction-specific engineering practice requirements.



PEOPLE, SAFETY AND ENVIRONMENT

Safe work and respect for people.

7.0

Health, safety, security and environmental responsibility

Blackfin expects safe planning, competent execution, hazard identification, compliance with worksite and client controls, and prompt reporting of incidents, near misses and unsafe conditions.

Blackfin respects applicable environmental requirements and seeks to prevent pollution, unnecessary waste and harm arising from its activities.

STOP-WORK AUTHORITY

Personnel must exercise stop-work authority where there is a credible immediate danger and resume only after appropriate risk controls are established.

8.0

Human rights, labor and respectful workplaces

Blackfin respects internationally recognized human rights and prohibits forced labor, human trafficking, child labor, harassment, discrimination and exploitative employment practices.

Employment practices must comply with applicable requirements concerning recruitment, wages, hours, freedom of movement, workplace safety and lawful worker rights. Concerns must be escalated and assessed without retaliation.

The supporting Modern Slavery, Fair Labor Practices and Human Rights policies define additional expectations.



COMPETITION AND INFORMATION

Fair dealing.

9.0

Fair competition, procurement and supplier management

Blackfin competes on merit and prohibits bid rigging, price fixing, improper coordination with competitors, misuse of confidential competitor information and favoritism based on undisclosed personal interests. Supplier selections must be fair, proportionate and supported by objective criteria appropriate to risk, including competence, quality, HSE, integrity, security and commercial value.

Suppliers and subcontractors must receive appropriate conduct expectations through the separate Supplier Code, engagement documents and risk-based qualification or due diligence. Material concerns require documented assessment and proportionate corrective action.

10.0

Confidentiality, cybersecurity, privacy and intellectual property

Personnel must protect Blackfin, client and third-party confidential information; use information only for authorized purposes; observe access controls and applicable data protection laws; and promptly report suspected loss, unauthorized disclosure or cybersecurity incidents through the designated company process. Company and client intellectual property must be respected.

UNAPPROVED TOOLS AND AI

Information must not be transferred to unapproved tools, personal accounts or external AI systems contrary to applicable policy or contractual conditions.



RECORDS AND TRADE

Records you can rely on.

11.0

Accurate books, records and communications

Business and project records must be accurate, complete, timely and traceable. Invoices, timesheets, expenses, qualifications, proposals, procurement documentation, inspection records, audit reports and technical deliverables must reflect actual facts and work performed.

Records must be retained and disposed of in accordance with legal, contractual and document-control requirements. Public statements and commitments on Blackfin's behalf may be made only by authorized persons.

12.0

Trade compliance and responsible external relationships

Personnel must comply with applicable sanctions, export controls, restricted-party requirements and import/export obligations.

REFER BEFORE YOU COMMIT

Transactions involving higher-risk jurisdictions, government officials, agents, intermediaries or unusual payment arrangements must be referred for appropriate review before commitment.

RAISING CONCERNS

Speak up.

13.0

Speaking up, no retaliation and investigations

Any person covered by this Code is expected to promptly report reasonably suspected misconduct, unsafe or unlawful practices, coercion, harassment, fraud, retaliation or material technical-integrity concerns.

Reports may be made to the person's manager or, where that is inappropriate, directly to the Director GRA or the CEO.

FIRST

Your manager

The usual place to raise a concern.

OR

Director GRA

Where raising it with your manager is inappropriate.

OR

Chief Executive Officer

A direct route, where that is more appropriate.

OUR PROMISE

No retaliation

Blackfin prohibits retaliation against anyone who makes a report in good faith or participates honestly in an inquiry.

Reports will be assessed impartially, with confidentiality maintained as far as reasonably practicable and consistent with legal obligations. Records of concerns, decisions, investigations and corrective actions shall be protected and appropriately retained.

Deliberately false allegations made maliciously may be addressed separately from reports made in good faith.

No individual is required by this Code to waive legal reporting rights.

14.0

Breaches, corrective action and governance

Confirmed violations may result in training, control improvements, corrective action, reassignment, discipline, termination of engagement or referral to appropriate authorities, depending on the circumstances and applicable law.

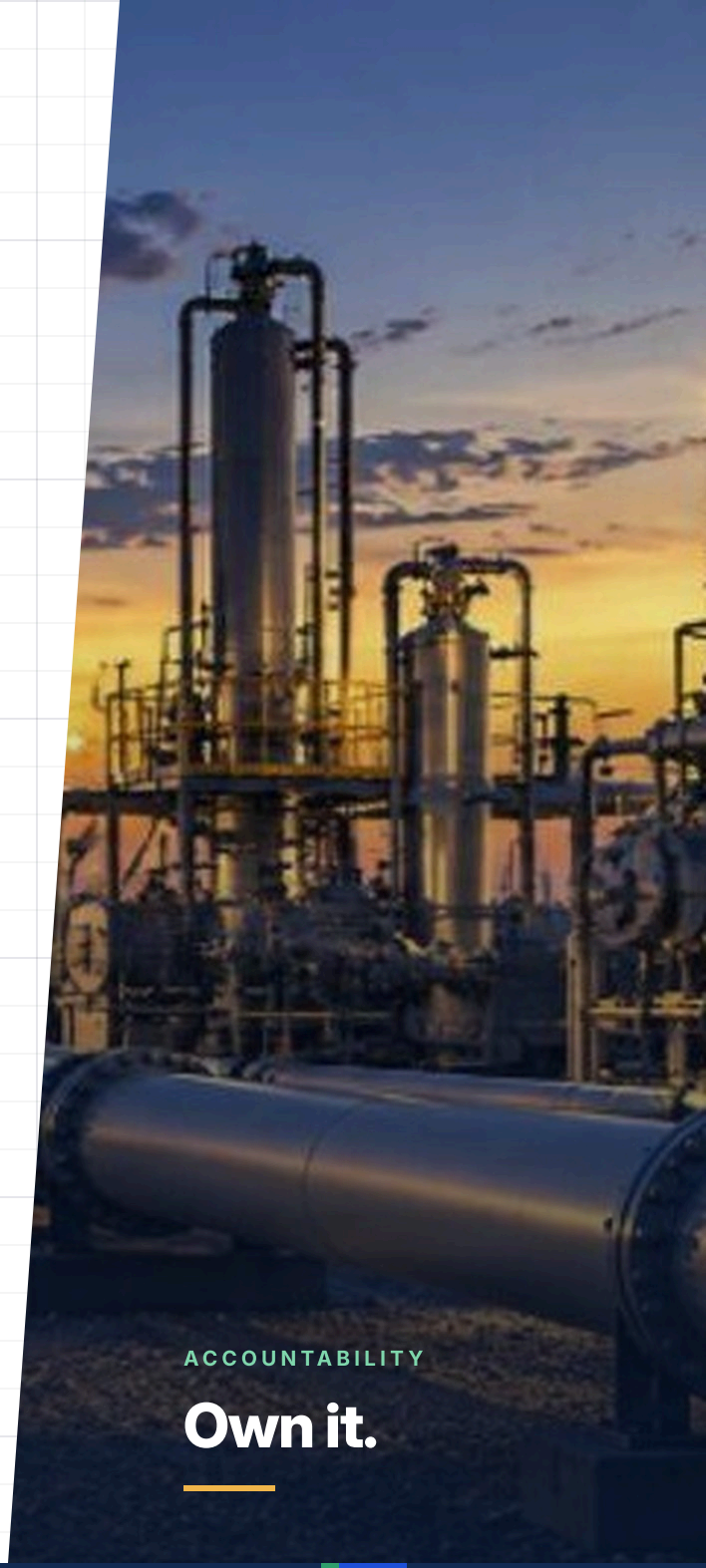
Blackfin will review this Code periodically and after significant legal, organizational or risk changes, communicate revisions and maintain appropriate evidence of acknowledgement and training.

15.0

Related controlled documents

This Code is aligned with the controlled revision of the following documents.

BFO-QTY-GP-008	Anti-Corruption Policy
BFO-HSE-GP-060	Modern Slavery
BFO-HSE-GP-061	Fair Labor Practices
BFO-HSE-GP-062	Ethical Operating Practices
BFO-HSE-GP-063	Human Rights





BLACKFIN

ENGINEERING · INTEGRITY · ASSURANCE

The partner you trust with the hard part, judged on how it turns out for you.

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