

# Flare Cares

## Corporate Code of Conduct



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# A Message from the Directors

As we mark ten years of Flare, we're proud of what we've built: a company **defined by purpose, driven by people**, and trusted across some of the world's most **demanding environments**. From our roots in offshore safety to our growing footprint in renewables and global service hubs, we've always held to the same mission: to protect lives and assets through **precision, integrity, and care**.

This Code of Conduct sets out how we live that mission every day. It reflects our core values – **Safety, Trust, Consistency, Reliability, and Agility** – and anchors them in real-world expectations and responsibilities. It's not a box-ticking exercise. It's a practical guide to doing the right thing for our clients, our colleagues, our communities, and the environment we all share.

Ethical conduct is essential to our continued success. It **protects our reputation, ensures legal compliance, and builds trust** at every level of our business, from the people we employ and the partners we choose, to the sectors and communities we serve. Upholding the principles in this Code will help us **grow responsibly, make better decisions**, and create a workplace where **respect and accountability** go hand in hand.

Everyone at Flare, regardless of role, site, or seniority, has a shared responsibility to follow this Code and to speak up if something isn't right. This isn't just about avoiding misconduct; it's about actively promoting a culture where **integrity is standard**, and **safety comes first**.

We're asking you to read it, reflect on it, and carry it with you in the decisions you make. By doing so, you help ensure that Flare continues to be a **business we're proud of**. One that delivers not only for today's challenges, but for the next decade and beyond.

*A McLean*

**Amanda McLean**  
Finance Director



**Amanda McLean**  
Finance Director



**Dan McLean**  
Operations Director



**Keith Robertson**  
Sales Director

# Introduction

At Flare, we believe real change starts with action. Our commitment to independence, impartiality, and integrity is more than just a responsibility – it's a promise to create a positive, lasting impact on the world around us.

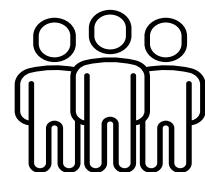
## Flare Cares about



We take an active role in reducing our environmental footprint, conserving resources, and promoting sustainable practices. Our goal is not only to minimise harm but to contribute to a healthier planet for future generations.

## The Environment

## Flare Cares about



Our people are at the heart of everything we do. We foster a supportive workplace where everyone is valued, respected, and given the opportunity to grow. Investing in our team's well-being and development ensures a stronger, more innovative organisation.

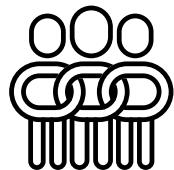
## Our People

# Our Collective Responsibility

Leaving the world in a better state than we found it requires collective effort. Our ESG (Environmental, Social & Governance) commitments extend beyond our company to our partners, suppliers, and clients. By working together, we can drive sustainable progress and build a future that benefits everyone.

This guide outlines the principles that shape our operations and relationships, as well as what we expect from our teams.

## Flare Cares about



We are committed to making a meaningful difference in the communities where we live and work. Through local engagement, charitable initiatives, and responsible business practices, we strive to create lasting, positive change.

## The Community

## Flare Cares about



Trust, transparency, and accountability are the foundations of our business. We uphold the highest ethical standards, ensuring that integrity guides every decision we make.

## Leading with Integrity

# Our Values



**Safety is not just a priority, it's our foundation.** We embed safety into every decision, system, and service we deliver. From offshore oil and gas to renewables and shipping, we work proactively to prevent incidents, protect people and assets, and uphold the highest industry standards. Nothing is more important than ensuring everyone goes home safe, every day.



**Trust is earned through action.** We build lasting relationships by delivering on our promises, maintaining transparency, and operating with integrity. Our clients, partners, and teams know they can rely on us because we back our words with consistent performance and genuine accountability.



**Consistency is what turns high standards into everyday practice.** We bring precision and discipline to every project, ensuring dependable results time after time. Whether we're inspecting helidecks or developing innovative safety systems, our clients trust us to deliver with the same level of quality every time, everywhere.



**Our clients count on us because we have consistently delivered.** From annual compliance checks to urgent mobilisations, we deliver what we say we will. Our reputation is built on performance, and we take pride in being a dependable partner across the energy, marine, and renewables sectors.



**In a fast-moving industry, agility is essential.** We adapt quickly to challenges, respond to client needs without delay, and innovate with purpose. Our flexible approach means we can tailor solutions, deploy resources rapidly, and keep operations running smoothly, even in the most complex environments.

# Scope

This Code of Conduct applies to all employees, contractors, partners, and representatives of Flare, across all locations and operations. It outlines both what the company is committed to delivering and what we expect from everyone representing us.

At Flare, we are committed to fostering a respectful, safe, and inclusive work environment, supporting ethical decision-making and promoting professional growth. We also recognise our duty of care to ensure the well-being and safety of our employees, contractors, and stakeholders. In return, we ask that all individuals act with integrity, uphold our values, and follow legal and regulatory requirements in all workplace interactions, business-related activities, and while representing the company on-site or off-site.

The principles in this Code apply to everyone within the company and extend to our relationships with clients, vendors, stakeholders, and the broader community. It covers all business activities, including meetings, communications, travel, and external events.

By following this Code, we all contribute to maintaining a culture of professionalism, respect, and accountability, ensuring that our actions reflect the high standards we stand for.



# Flare Cares about the Environment

Flare actively manages its environmental impact, integrating sustainable practices into every aspect of our operations. We recognise that businesses have a responsibility to reduce their carbon footprint, conserve natural resources, and minimise waste. Our approach is proactive – we aim not only to do less harm but also to create a positive environmental impact wherever possible.

## We care about:

### **Our Carbon Footprint**

We aim to continuously improve energy efficiency, optimise transportation and logistics, and invest in cleaner technologies. We recognise that while overall emissions may increase as the business grows, our focus is on reducing environmental impact per unit of output.

### **Sustainable Resource Management**

Prioritising waste reduction, responsible sourcing, and circular economy principles, to extend the life cycle of materials and minimise environmental strain.

### **Compliance and Beyond**

Meeting and exceeding environmental regulations, setting internal sustainability goals, and promoting environmental responsibility among employees, partners, and suppliers.

### **Encouraging Collaboration**

We want to work with clients, suppliers, and industry partners to develop and implement sustainable best practices across the entire supply chain. We review our suppliers to ensure the highest regulatory and environmental standards.

## **What we expect from you:**

Be mindful of your energy usage and take action to reduce it wherever possible.

Reduce waste by recycling properly and using resources efficiently.

Support sustainable purchasing decisions by considering environmental impacts as much as possible when sourcing materials.



# Flare Cares about our People

Flare is dedicated to creating a safe, supportive, and inclusive workplace. We prioritise the well-being, growth, and development of our employees. We encourage our partners to align with these values in their own organisations, fostering a culture of safety, respect, and opportunity for all.

## **EACH** Voice Matters

At Flare, our people are our greatest strength. Their expertise, commitment, and collaboration power our progress, and we're committed to providing an environment where every individual is supported, respected, and heard.

We promote a culture of inclusion and ownership, encouraging everyone to take an active role in shaping our workplace. We empower **EACH** individual to contribute meaningfully:



**E**ngaged in their role and the company's vision.

**A**cting to support a healthy and inclusive workplace.

**C**aring for mental health and well-being, fostering a supportive and open environment.

**H**elping to create positive change through collaboration and feedback.



## Mental Health at Work

Mental wellbeing is fundamental to safety, focus, and performance. We actively support open dialogue and proactive habits that benefit mental health - not just in policy, but in practice.

Through our **Speak Up** initiative, we encourage honest conversations and offer a clear route to support. Our **Walk & Talk** programme provides time away from desks and screens, pairing team members for outdoor breaks that boost energy, strengthen relationships, and make space for meaningful discussions - including around mental health.

These actions are part of our ongoing commitment to building a safe, inclusive, and high-performing workplace.

# Flare Cares about our People

## We care about:

### Employee Health, Safety, and Wellbeing

Ensuring a safe work environment, with a focus on physical and mental health. A safe and healthy workplace enhances employee satisfaction, reduces incidents, and improves productivity. We take safety seriously, whether in the office, at a service centre, aboard a vessel, or on an offshore asset.

### Employee Development and Retention

Promoting employee growth through training, development, and fostering high retention. We know that a skilled, engaged workforce boosts productivity and business success. We welcome anonymous feedback from our team, using it to shape our culture and priorities, and we carry out an annual Employee Satisfaction Survey.



## **Fostering a Culture of Respect and Inclusivity**

We view diversity as a strength. One that drives better thinking, better outcomes, and a more resilient organisation. We are committed to advancing diversity, equity, and equal opportunity across every area of our business. We actively prevent discrimination and uphold fair, respectful treatment for all. We operate a zero-tolerance approach to discrimination of any kind, including that based on:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

## **Equipping People to Succeed**

Our tools, equipment, vehicles, and intellectual property are critical to our operations and success. These assets are provided for business use and must be handled responsibly, efficiently, and with care. We are committed to minimising waste, preventing damage, and ensuring assets are used appropriately to support our work. Where applicable, we protect the results of our work as intellectual property and maintain confidentiality in line with company standards. We ensure that company assets are safeguarded and not used for unauthorised or personal purposes.

# Flare Cares about our People

## **What we expect from you:**

Conduct yourself professionally and courteously at all times.

Treat colleagues, clients, and stakeholders with dignity and respect.

Represent the company positively and avoid conflicts of interest.

Maintain a professional standard of dress appropriate to your role.

Keep workspaces clean, safe, and orderly.

Champion equal opportunities and inclusive practices.

Prohibit discrimination, harassment, or victimisation of any kind.

Ensure fairness in recruitment, development, and day-to-day interactions.

Follow company policies, procedures, and all legal requirements.

Participate in fire drills and emergency procedures.

Use protective clothing and equipment as needed.

Report accidents, injuries, or hazards promptly.

Do not use illicit drugs or attend work under the influence of alcohol.

Employees with substance misuse concerns are encouraged to seek support.

Support your own wellbeing and that of your colleagues.

Access support where needed for mental health or personal challenges.

Prioritise health and safety in all workplace practices.

Encourage employee wellbeing and support for mental health.

Use company mobile phones and credit/fuel cards responsibly.

Report any loss or theft of company property immediately.

Use company computers, email, and internet for legitimate business use.

Do not access or distribute offensive, inappropriate, or illegal material. Follow software use and virus prevention procedures.

Keep systems and accounts secure with strong passwords.

Return all company property upon leaving.

Follow guidance during garden leave periods.

Participate in exit processes to support transition and continuity.

# Flare Cares about our Community

Flare is dedicated to supporting the communities in which we operate, recognising that a strong, thriving community benefits everyone. Our commitment goes beyond business operations – we actively seek opportunities to create a positive and lasting impact.

We know that community is more than the radius around our Service Centre of Excellence. We live in a global community, and we strive to reflect this in all our dealings worldwide..

## We care about:

### **Investing in Local Economies**

We believe that businesses have to support each other. We aim to prioritise local hiring, as well as sourcing materials and services locally and supporting small businesses to drive economic growth. We understand that, due to the specialised nature of our supply chain, local sourcing isn't always feasible. However, we prioritise it wherever possible.

### **Engaging in Social Initiatives**

Partnering with charities, schools, and organisations to support education, skills development, and social well-being programs. We support local charities, sports teams, and community groups who directly support the communities we serve.

### **Promoting Sustainability in Communities**

Supporting environmental initiatives that enhance local ecosystems, reduce waste, and encourage sustainable practices within the regions we serve.

## Responsible Social Media

We know that social media plays a big part in bringing diverse communities together. We also recognise that it can be used in an unhealthy way, leading to many individual and societal problems. We encourage all our team to use social media in a responsible way and ensure that our business dealings on social media are always conducted with professionalism and respect.

### What we expect from you:

Participate in community projects and support local initiatives.

Advocate for local hiring and sourcing to help build sustainable local economies.

Use social media responsibly and do not bring the company into disrepute.

Ensure business-related social media profiles are authorised.

Avoid harassment or unprofessional conduct on social platforms.



# Flare Cares about Leading with Integrity

Flare is committed to the highest standards of ethical behaviour and transparency, ensuring that integrity is embedded in everything we do. We believe that strong ethical foundations build trust, strengthen relationships, and create a responsible business environment.

## We care about:

### **Accountability in Decision-Making**

Holding ourselves to the highest ethical standards, ensuring that every business decision is made with fairness, responsibility, and compliance with regulations. We are committed to being honest, open, and fair in our customer relationships and provide the standard of products and service that have been agreed. We take all reasonable steps to ensure the safety and quality of the products and services we provide.

### **Transparent Operations**

Communicating openly with employees, clients, and partners, providing clear policies and expectations, and fostering a workplace where honesty is valued. We have quarterly Town Hall meetings and a monthly employee newsletter. We also welcome comments and suggestions anonymously through our Digital Comments Box. Each of these is read and considered by the company directors.



## **Ethical Leadership**

Leading by example, promoting a culture where ethical behaviour is recognised, encouraged, and rewarded at all levels of the organisation. We have implemented strict zero-tolerance policies to prevent bribery, fraud, and conflicts of interest, and provide training to employees at all levels. We will ensure to provide channels for employees to report concerns safely and confidentially.

## **Whistleblower Protection and Open Dialogue**

We want employees and partners to be able to speak up without fear of retaliation, ensuring that concerns are addressed promptly and fairly. Our Whistleblower Policy ensures fair treatment of anyone who reports misconduct.

# Flare Cares about Leading with Integrity

## **What we expect from you:**

Notify your Line Manager before accepting secondary employment or private work.

Avoid activities that could conflict with the company's interests.

Never engage in bribery, corruption, or tax evasion.

Participate in relevant compliance and financial crime training.

Report suspected breaches to your Line Manager immediately.

Raise concerns through internal or external whistleblowing channels.

Ensure whistleblowers are protected from retaliation and confidentiality is assured.

Help foster an environment where reporting misconduct is encouraged and supported.

Comply with GDPR and all relevant Data Protection laws.

A photograph of a person wearing a blue hard hat and a safety harness, working on a piece of industrial equipment. The person is looking down at the work. The background shows more industrial structures and pipes.

Process and store personal and sensitive data securely and lawfully.

Maintain confidentiality and data integrity in all activities.

Maintain a valid licence and appropriate insurance for business-related travel.

Submit receipts for all expense claims.

Pay any fines incurred while driving on company business.

Demonstrate honesty and integrity in all interactions – with colleagues, suppliers, clients, and other stakeholders.

A photograph of an offshore wind farm. Several wind turbines with three blades each are standing in the water. The blades are silhouetted against a bright, overexposed sky. The water is a deep blue. The turbines have yellow bases and blue or orange blades.

**“The greatest threat to  
our planet is the belief that  
someone else will save it.”**

**- Robert Swan**

# Raising Concerns or Reporting Breaches

We are committed to maintaining a culture of **integrity, respect, and accountability**. If you're ever uncertain about the meaning of this Code of Conduct, or you believe a breach may have occurred – whether by an individual, team, or third party - we encourage you to speak up.

You can raise concerns with:

- **Your Line Manager in the first instance**
- **HSEQ Advisor**
- **Company Directors**
- **The prescribed person or body for the relevant issue**
- **Flare employees can also use the anonymous '[Comments Box](#)'**

## Confidentiality and Support

All reports are handled **confidentially**. While you may raise concerns anonymously, we encourage open dialogue where possible so we can respond fully and keep you informed throughout the process.

Reports are assessed **promptly, fairly**, and in line with our **internal procedures**. Information is shared only where necessary or where legally required.

## No Retaliation

We know it can be difficult to speak out. You have our **full support and protection**. Flare guarantees that no individual will face retaliation or negative treatment for raising genuine concerns in good faith.

**When in doubt, speak out. Integrity protects everyone.**

# A Future Built on Responsibility

At Flare, we believe that true leadership is measured not just by what we achieve, but by how we achieve it. Our commitment to **sustainability, people, community, and integrity** is more than just a set of principles; it's a way of doing business that defines who we are and the impact we strive to make.

The four pillars of Flare Cares – the **Environment**, the **Community**, our **People** and **Leading with Integrity** – form part of every decision we make as a company. We firmly believe that by excelling in these areas, we can make a genuine difference to the world we live in and ensure a sustainable business for years to come.

We understand that real change happens when actions match words. That's why we are constantly **challenging ourselves to do better** – to reduce our environmental footprint, foster an inclusive and thriving workforce, uplift the communities we serve, and operate with unwavering integrity.

But we know that no organisation can create a sustainable future alone. **Progress is a collective effort**, and we invite our employees, clients, suppliers, and partners to join us in driving meaningful change. By working together, we can build a world where safety, sustainability, and ethical leadership are not just goals, but realities.



***Flare Cares – because a better  
tomorrow starts with the  
choices we make today.***





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