



# Code of Conduct

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# An industry everyone can trust



Our Members join us because, by working together, we can improve our collective performance, raise standards and help to share best practice across our industry. This is fundamental to creating a reputation for integrity and sustainable business practices that earns our stakeholders' trust and helps us all to succeed.

Of course, many of our Members have their own codes of conduct, but until now we have never, as an industry, drawn together what we all stand for.

While IMCA, as a trade association, holds no power over its Members, we do represent a consensus – a recognition of the vital importance of upholding shared standards of behaviour and practice for the good of all. This, our Code of Conduct for all our Members, has been written to express that consensus. There is nothing surprising or controversial here. It means that IMCA Members agree we should all do business in accordance with some universal principles that can be simply summarised as complying with applicable law, accepted ethical and sustainable business practices, and internationally recognised human rights standards.

Based on these principles, this Code sets out in clear, straightforward language the behaviours that IMCA Members and our stakeholders should be able to expect of each of us.

It is a Code that helps us all and is the voice of all of us.

**Iain Grainger**

Chief Executive IMCA  
April 2024



## 1. Our Code of Conduct

Trust lies at the heart of those relationships on which our business, and the future success of our industry, are built. We are all responsible for maintaining it.

### **Our commitments.**

We comply with accepted standards of ethical business conduct. That means we always act with honesty, fairness, respect, good faith, and integrity in every aspect of our business.

We will always comply with all applicable laws, wherever we operate. We will ensure that conflicts of interest are appropriately managed.



## 2. Operating ethically and legally

As IMCA Members, we are committed to upholding the principles set out in this Code of Conduct. We respect the rule of law, and we respect and protect human rights and the environment, and the people, places and communities impacted by our operations.

Those impacts extend to the areas of health, safety, security, the environment, anti- corruption and treatment of people generally, especially as regards labour standards and working conditions. Managing such matters properly is an internationally recognised duty of all businesses.

This Code sets out the commitments we make to fulfilling that duty and acting with integrity. It describes how we want to work with each other and our stakeholders, and how we should expect our suppliers and sub-contractors at every level of the supply chain to behave.

As part of our Membership, we share experience and knowledge that raise standards and ensure that the latest developments in working practices are adopted everywhere across our industry.

We encourage stakeholders to raise in confidence and without fear of retaliation any concerns about these principles not being upheld. Such concerns should be reported to the IMCA Member in question.

Each IMCA Member commits to have in place and raise awareness of clear internal processes and communication channels for people to raise concerns about breaches of these principles.



### 3. Keeping people safe

We often work in extreme conditions and in harsh environments, where risks to our people have to be carefully managed every day. We recognize we have a responsibility to ensure that our people make it home safely after their work is finished.

#### **Our commitments.**

Before undertaking or participating in any work, we will always assess the safety risks and take mitigating action to ensure those risks are avoided, where this is possible, or minimised.

We manage our operations to reduce the risk of harm to a level that is as low as reasonably practicable (ALARP), so that all our people stay safe every day, everywhere, and no lives are ruined or lost.

This requires us to ensure that the highest standards of safety and of safety training, and a safety culture, are in place and maintained in our own organisations and in all our work.

We will not cut corners or compromise on what is required to do this.

## 4. Protecting our environment

Our planet is under threat as never before and we recognise that we play a vital part in protecting the marine environments and all places where we work.

We take a proactive approach towards mitigating the impact of our activities on the environment and responding to the effects of climate change.

### **Our commitments.**

Before undertaking or participating in any work, we will always assess the environmental impact and take action to ensure these risks are avoided, where this is possible, or are minimised.

We will not cut corners or compromise on what is required to do this. We all agree that it is the responsibility of every IMCA Member to understand what environmental measures are needed in their work.





## 5. Treating people fairly and with respect

We wish our industry to be seen and recognised for fairness and respect in the way we treat people wherever we work in the world, safeguarding their dignity, freedom, and equality. We also know that our performance depends on the welfare of those who work for us and with us and who live in the communities impacted by our work.

### **Our employment commitments.**

We will not accept any abuse of human rights, including human trafficking, modern slavery, child labour, or any other form of forced or involuntary labour, and we will not work with anyone who does.

We will always follow fair employment practices, and never exploit or mistreat those whose labour and talent we rely on for our success.

This means at an absolute minimum that we will never fall below applicable legal requirements, agreed industry norms or international agreements for wages and working hours or fail to comply with the International Labour Organisation's principles around child labour and minimum working age. All wages will be paid on time. We will play our part in combatting [unlawful or unethical] practices such as retention of passports and other documentation, wage deductions, recruitment fees and debt bondage, and restrictions on freedom of movement or to change employment.

In addition, we will ensure that working conditions support the health and welfare of all those working for us, and that there are clear policies against bullying, harassment, discrimination and exploitation in the workplace. We will respect and protect people's personal data in accordance with applicable laws.





## 6. Confronting bribery and corruption

We know that tolerance of, or participation in any form of bribery and corruption is highly corrosive, and often harms the poorest and most vulnerable members of society. So, we will never accept any such practices.

### **Our commitments.**

Every Member of IMCA has a role in preventing corruption, and how we do that is clear and simple:

No matter where we are, and no matter what “local custom” is, we never ask for, accept, offer, or give any bribe or improper benefit to anyone in order to secure a business advantage or a personal gain for ourselves or others. Nor will we ask or allow anyone to do so on our behalf.

### **Our commitments to third parties and communities.**

Our contracts will be made in good faith, and we will honour the obligations they set out, including paying people on time.

We will also at all times keep accurate records, reports and invoices that provide a true account of the work we have undertaken.

We will treat the communities among which we work with care, courtesy, and respect. We will protect and respect their rights, their welfare, and the environment they live in.



## 7. Working in a fair marketplace

We all need to know that our industry provides a level competitive playing field, and that everyone will compete fairly. This is fundamental to underwriting IMCA's mission – To improve performance in the marine contracting industry.

### **Our commitments**

We will always compete with others in full compliance with the competition and anti-trust laws of the jurisdictions in which we work.

We will never provide false information, collaborate in bid rigging, or improperly disclose confidential details about other competitors and their prices or bids in order to gain or confer an unfair advantage or benefit.

We will comply with the IMCA Competition Law Compliance Policy.





## 8. Responsible sourcing

We are committed to working with suppliers and other third parties who uphold similar standards to those set out in this Code.

*This is our Code and these are our Commitments to IMCA, its stakeholders, our fellow Members and to an industry everyone can trust.*



# Governance Series

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