

**GLOBAL SHIP LEASE, INC.**

SUPPLIER CODE OF CONDUCT

Effective: August 24, 2023

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## **Purpose and Scope**

Global Ship Lease, Inc. (the “Company”, “Global Ship Lease” or “GSL”) is committed to conducting business in a responsible, ethical and professional manner, and has adopted this Supplier Code of Conduct (this “Code”) to ensure that its business partners are similarly committed to these principles.

This Code is intended to communicate GSL’s minimum standard of business ethics that its suppliers are expected to comply with when doing business with GSL. Suppliers include any person or legal entity providing services or doing business with the Company, including with the Company’s technical ship manager, Technomar Shipping Inc., and commercial ship manager, Conchart Commercial Inc. (“Suppliers”).

Suppliers shall report any alleged or observed breach of this Code in its business activities related to the Company. In the case of any breach of this Code, Suppliers shall take the necessary corrective actions in a timely manner at their own cost. Suppliers are also invited to discuss with the Company any gaps in implementation of this Code, including their scheduled corrective actions.

All Suppliers are required to be familiar with this Code, comply with its provisions and report any suspected violations as described below in the section entitled “Reporting Non-Compliance, Anti-Retaliation and Whistleblower Policy”.

## **Confidential and Non-Public Information, Personal Data Privacy**

It is important that Suppliers protect the confidentiality of Global Ship Lease’s information. Suppliers may have access to proprietary and confidential information concerning GSL (including its customers, suppliers, joint venture partners, employees, advisors and consultants). For purposes of this Code, confidential information is all non-public information entrusted to or obtained by a Supplier, including, *but not limited to*, non-public information that might be of use to competitors or harmful to the Company (including its customers, suppliers, joint venture partners, employees, advisors and/or consultants) if disclosed, and non-public information concerning the business, financial results and prospects, and potential corporate transactions of the Company (including its customers, suppliers, joint venture partners, employees, advisors and/or consultants). Suppliers are required to keep such information confidential during their contractual relationship with the Company as well as thereafter, and are expected to comply with any confidentiality provisions in our agreements with them. Further, Suppliers shall adhere to applicable data privacy laws.

## **Honest and Fair Dealing**

Suppliers should conduct their business fairly and honestly at all times in accordance with the highest ethical standards. Suppliers must endeavor to deal honestly, ethically and fairly with their customers, suppliers, service providers, competitors, investors, and employees. No Supplier should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unethical practice. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct.

## **Compliance with Laws, Rules and Regulations**

Suppliers should comply with all applicable laws, rules and regulations. Additionally, it is the responsibility of each Supplier to adhere to the standards and restrictions imposed by applicable laws, rules and regulations. Where the standards in this Code differ from local and national laws as well as international standards, the Company expects its Suppliers to apply the stricter standard. In the event of standards in this Code conflicting with local and national laws as well as international standards, the Company encourages its Suppliers to inform the Company in order to jointly establish the most appropriate course of action.

## **Modern Slavery and Child Labor**

In line with the Company’s zero-tolerance approach towards any form of slavery, child labor, forced labor or human trafficking, Suppliers should not engage in or condone the unlawful employment or exploitation of children. Furthermore, Suppliers should not use any form of forced or involuntary labor and refrain from practices that can give

rise to a risk of involuntary labor. Suppliers should comply fully with applicable laws, regulations and relevant collective agreements concerning working hours and overtime, leave and minimum rest periods and adhere to international labor standards and internationally recognized human rights addressing working conditions.

### **Health and Safety; Environmental Compliance**

Suppliers are expected to foster a safe and healthy work environment, following all applicable health and safety rules, regulations, laws and policies and procedures carefully, and by reporting accidents, injuries and unsafe equipment, practices or conditions. Further, Suppliers shall abide by applicable laws and regulations relative to the use of controlled substances.

Furthermore, Suppliers shall operate their business in accordance with all applicable safety and environmental laws and regulations so as to ensure the protection of the environment and their personnel and property and minimize adverse environmental effects. Suppliers are also expected to support the Company's environmental commitments and implement activities to continuously reduce the environmental impact of their operations.

### **Freedom from Discrimination and Harassment**

Suppliers shall be committed to creating and maintaining an environment where all individuals are free from discrimination or harassment and bullying, by providing a working environment free from discrimination against staff on the basis of sex or sexual orientation, race (which includes color, nationality, ethnic or national origin), marital or civil partner status, gender reassignment, religion or belief, disability, age, political or ideological affiliation, and pregnancy or maternity. Suppliers should firmly observe equal employment opportunities, with hiring and employment practices that are based on the grounds of merit and work-related abilities.

### **Diversity, Equity and Inclusion**

Suppliers should be committed to diversity and inclusion among their workforce and eliminating unlawful discrimination.

### **Anti-Bribery, Anti-Corruption, and Anti-Fraud**

Suppliers shall comply with the anti-corruption laws of the countries in which they do business. Suppliers shall not engage in any form of corrupt practices, including extortion, fraud, bribery, corruption payments, and money laundering, whether directly or indirectly, and shall have standards and procedures in place that prohibit individuals acting on their behalf from taking part in such activities.

### **Anti-Money Laundering**

Suppliers shall forbid facilitating or engaging in transactions that result in the diversion of funds for money laundering. Money laundering is defined as the process of converting illegal funds in such a manner as to make the funds appear to be derived from legitimate sources. Suppliers shall comply with any applicable laws and regulations regarding anti-money laundering and take active measures to prevent their financial transactions from being exploited by others for this purpose.

## **Securities Trading**

As a public company, GSL is subject to a number of laws concerning the sale and purchase of its shares and other publicly traded securities. Suppliers should prohibit trading in the Company's securities while in possession of material, non-public information about the Company. Using material non-public information about GSL to trade in GSL's securities is illegal and may result in criminal proceedings.

## **Reporting Non-Compliance, Anti-Retaliation and Whistleblower Policy**

This Code is a summary of GSL's ethical standards on how we should conduct business together, and the rules you should comply with when engaging with GSL. The Company expects our suppliers to have a reporting system to raise any questions, concerns or complaints with respect to suspected or actual violations of ethical standards and the law, without any fear of retaliation and to investigate them in an impartial and timely manner.

The Company also encourages anyone to alert us if they suspect or know of any potential or actual violation of this Code. The Company will not retaliate or allow retaliation for reports made in good faith. Any reports may be made anonymously.

In addition to any reporting system set up by any Supplier, any questions or reports of potential violations of this Code can also be made in one of the following ways:

- in writing by email to [whistleblower@globalshiplease.com](mailto:whistleblower@globalshiplease.com) or by mail to Global Ship Lease, Inc., Attention: Audit Committee Chairman, c/o Technomar Shipping Inc., 3-5 Menandrou Str, Kifissia 145 61, Athens, Greece;
- by calling our whistleblower hotline at +30 210 623 6778 and leaving a voice message; or
- directly to management by contacting the Company's Head of Internal Audit in person or in writing at Global Ship Lease, Inc., Attention: Head of Internal Audit, c/o Technomar Shipping Inc., 3-5 Menandrou Str, Kifissia 145 61, Athens, Greece.