

Data Protection & Retention Policy

BMS-IGS-COR-POL_005 · REVISION 01 · ISSUED 19 JUNE 2026

PURPOSE

The purpose of this Data Protection & Retention Policy (“Data Protection Policy” or (“Policy”)) is to formalise InterOcean Group’s (“InterOcean”) commitment to protecting the personal data and information entrusted to it and to managing records responsibly throughout their lifecycle. This Policy sets out InterOcean’s principles, responsibilities and controls for the lawful, fair, and transparent processing, protection, retention, and disposal of information.

Relationship to the InterOcean Code of Conduct: This Data Protection Policy supports InterOcean’s commitment to ethical conduct, regulatory compliance and good governance, and should be read in conjunction with the Code of Conduct and other applicable corporate policies; where standards differ and there is no conflict with applicable law, apply the higher/more stringent standard.

MESSAGE FROM THE CHIEF EXECUTIVE

Understand and apply the Data Protection & Retention Policy (“Data Protection Policy”) or (“Policy”). At InterOcean, trust, integrity and accountability are fundamental to how we conduct our business. Our people, clients and partners trust us to manage information responsibly, ethically and in full compliance with applicable laws and regulations. Protecting personal data and managing records appropriately are therefore essential to maintaining that trust and to upholding our values.

Information governance and data protection depend on personal accountability: Everyone is expected to understand their responsibilities under this Policy, handle information responsibly, follow required controls, and seek guidance where uncertainty exists. If there is any doubt, stop and ask—speak with your manager or the Commercial Department – Legal where compliance advice is required.

Follow the Data Protection Policy without compromise. This Data Protection Policy sets out our commitment to safeguarding information throughout its lifecycle, from creation and use through to secure retention and disposal. It reflects our responsibilities as a global organisation and supports the standards of behaviour outlined in the InterOcean Code of Conduct.

Compliance with this Policy is mandatory for all InterOcean Representatives. Each of us has a responsibility to understand how this Policy applies to our role and to ensure that personal data and records are managed with care, confidentiality, and professionalism always.

DOCUMENT CONTROL

REFERENCE

BMS-IGS-COR-POL_005

REVISION

01

ISSUED

19 June 2026

OWNER

Commercial Department – Legal

APPROVED BY

Fraser Moore, Chief Executive Officer

APPLIES TO

Global – all units

This statement is drawn from the controlled document of the same reference in InterOcean’s Business Management System, which remains the official version. InterOcean Group — Move. Manage. Maintain.

Fraser Moore

CHIEF EXECUTIVE OFFICER