ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Purpose

To prevent bribery and corruption to meet the principles set out in the UK Bribery Act 2010 (the "Principles").

Scope

This policy applies to all employees ashore and on board.

Policy Statement

- The Company has Zero Tolerance to facilitation payment or gifts of any kind unless it is done under duress.
- To comply with all applicable laws relating to Anti-Bribery and Anti-Corruption in the jurisdictions in which we operate and in particular with respect to the Principles.

In order to achieve this, we shall:

- Support any employee who passes up an opportunity or advantage that would compromise our standards.
- To ensure that our reputation for ethical behaviour and fair dealing with suppliers, customers, competitors and other stakeholders is maintained.
- To expect all employees to conduct themselves with high standards of integrity.
- To prohibit the giving or receiving of any gift, cash, entertainment or hospitality where the intention is to influence a business decision.
- To prohibit unofficial payments or gifts made to facilitate routine government action (facilitation payments) where there is an intention to influence a public official in the performance of his/her official function and gain an advantage in the conduct of business.
- To prohibit employees from asking for or suggesting any gifts and/or entertainment of any kind or amount from suppliers or any other person.
- If persons ask for gifts or facilitation, this shall be reported to concerned authorities.

Responsibility:

- Head of Technical, DPA, Alt. DPA: Policy review, enforcement and to actively support the employees to implement the principles.
- Heads of Department and Master: To ensure that the policy and procedures are strictly complied and provide guidance sought from employees.
- All employees of the company to strictly comply with the policy and procedures.

Head of Technical