

Code of Conduct Policy

This company policy of code of conduct describes the expectations we have of ourselves and our coworkers; it articulates the ideals to which we aspire.

The purpose of this policy is to instil confidence in our partners and co-workers, that we would conduct ourselves with honesty, fairness, and respect at all times, particularly during difficult circumstances.

We hope this policy helps to be a catalyst for our other partners and stakeholders to define their code of conduct policy in the shipping-Industry.

Persons to whom the policy applies:

- Our management team
- Our other staff (both direct and contracted)
- Our business partners

HONESTY:

- Honesty is our duty to understand the truth and act in a truthful manner both in our communications and in our conduct.
- We earnestly seek to understand the truth.
- We are truthful in our communications and in our conduct.
- We provide accurate information in a timely manner.
- We make commitments and promises, implied or explicit, in good faith.
- We strive to create an environment in which others feel safe to tell the truth.
- We do not engage in or condone behaviour that is designed to deceive others, including but not limited to, making misleading or false statements, stating half-truths, providing information out of context or withholding information that, if known, would render our statements as misleading or incomplete.
- We do not engage in dishonest behaviour with the intention of personal gain or at the expense of another.

FAIRNESS:

- Fairness is our duty to make decisions and act impartially and objectively. Our conduct must be free from competing self-interest, prejudice, and favouritism.
- We demonstrate transparency in our decision-making process.
- We constantly re-examine our impartiality and objectivity, taking corrective action as appropriate



- We provide equal access to information to those who are authorized to have that information.
- We make opportunities equally available to qualified candidates.

RESPECT:

- Respect is our duty to show a high regard for ourselves, others, and the resources entrusted
 to us. Resources entrusted to us may include people, money, reputation, the safety of others,
 and natural or environmental resources.
- An environment of respect engenders trust, confidence, and performance excellence by fostering mutual cooperation—an environment where diverse perspectives and views are encouraged and valued.

DIRECTOR