Section 02 – Company Policies

ALL VESSELS

Approved by:
General Manager

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CODE OF ETHICS

Date: 10.04.2015

Revision: 01

We expect the companies we work and cooperate with to demonstrate the same ethical behavior that we assume they expect from us.

We are proud of our commitment to providing our services and conducting our business in accordance with high ethical standards and within the laws, rules and regulations of the countries and industries we operate in.

We treat our customers and suppliers, and even our competitors with respect and by doing so demonstrate that we are a serious and truly trusted partner within our industry.

Whether it being our employees or our worldwide network of customers, suppliers, agents or other third party service providers and partners we expect them to show integrity, strong commitment to business efficacy and adherence to our Code of Ethics, and to never compromise its priority, no matter what.

We expect every person involved in each aspect of our operations, whether internally or externally, to obey the laws of the ports, cities, states and countries we operate in, although we do not expect everyone to obtain detailed knowledge of the laws in question.

Opstad Shipping AS expects and requires every employee, customer, suppliers, or any other third party service provider to adhere, comply and commit to our Code of Ethics.

We...

Prepared by: JJ

- respect the rights and requirements of our customers, suppliers and competitors
- provide accurate and trustful information about our services
- compete within the laws, rules, regulations, requirements and standards applicable to our operations
- are fair and objective with our customers and suppliers
- use professional ethical business practices when selecting customers and suppliers, negotiation contracts and awarding business, and during purchasing activities
- avoid situations and actions that may be influenced by personal interests or may appear to be for personal financial gain
- adhere to our customers` policies and regulations

We do not...

- lie or mislead people
- discuss terms and conditions of our relationship with customers and suppliers with our competitors
- provide false or misleading information regarding our competitors
- misrepresent or lie about the services we are able provide
- falsify or make untrue entries in reports, records, inspections, audits, tests or other documents
- accept or offer bribes or gifts of substantial value
- provide any political contributions to any political party or candidate, even if such contribution is lawful
- tolerate harassment based on:

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- Sexuality
- Race
- Color
- o Religion
- o Origin
- o Citizenship
- Pregnancy
- Disability
- Work performance
- Financial status

If you have any question regarding our Code of Ethics we kindly ask you to contact you supervisor, manager, superior officer, or Designated Person Ashore (DPA).

Opstad Shipping AS will take disciplinary actions against those who violate our Code of Ethics. Such actions may include termination of contact or agreement, reductions, retention or suspension of payments, suspension of duties, reductions, retention or suspension of wages or permanent employment termination.

Acknowledgement for receipt and acceptance:

- 2.1 Company policy
- 2.2 Drug and alcohol policy
- 2.3 Health, safety and environment policy

Name: Company:	
Position: Place/Date:	