



# Business Conduct & Ethics Policy

The Board of Directors of ASP Ship Management Group (**ASP**) hereby confirms its adherence to the requirements of sound business practices and a commitment to the following principles of business conduct and ethics. ASP acknowledges that both it and its customers are carrying on business with a view to profit and, in this regard, ASP requires that all its employees, officers and representatives take steps to ensure that ASP:

- provides services in compliance with its Integrated Management System;
- does not accept business for which it does not have the necessary capability and resources;
- allocates its resources so as to render equitable and lawful performance to each of our customers;
- advises the customer of any conflict of interest in accordance with all relevant provisions of the Management Agreements;
- complies with obligations of confidentiality including in respect of each customer's business and activities;
- complies with its obligations in relation to safety, protection of the marine environment and to the safeguarding of our customer's property;
- whenever practicable, advises the customer of any potentially dangerous or other unacceptable situations;
- observes standards of ethical conduct and complies fully with all applicable laws and regulations, including anti-bribery legislation, in every jurisdiction in which ASP does business;
- avoids situations where personal interests could conflict with, or even appear to conflict with, the interests of the Company;
- promotes a healthy working environment including, but not limited to, the provision of safeguards against drug and alcohol abuse;
- always conforms with internationally accepted standards and the requirements of our customer;
- does not knowingly participate, practice, commit to or continue to carry out business for customers when the service to be provided may be used in the furtherance of illegal activities to its actual knowledge;
- at all times adhere to sound business principles with respect to the management of funds and cash;
- abides by applicable privacy legislation and regulations; and
- does not commit to, or continue to serve, a customer who displays a lack of commitment to Maritime Legislation.

**Authorised By:**

David Borcoski

Group Managing Director & CEO

Adrian Whatley

Group COO – Crew Management

Robert Bird

Group COO - Technical