

 Chr. Th. Boe & Søn AS	<b>Code of Conduct &amp; Ethical Business Rules</b>	Dokument nr : 10.005
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**Chr.Th Boe & Son AS is committed to the highest standards of honesty and integrity. The purpose of the code is to describe our company's business conduct and ethics standards which we expect from our employees, and in our workplace.**

**This Code of Business Conduct and Ethics applies to all Chr.Th.Boe & Son AS management and employees, who at all time shall;**

***Compliance with laws and adherence to generally accepted standards***

- Comply with applicable laws and regulations of the countries in which we work or where we operate, including relevant anti-corruption legislation.
- Understand and adhere to the standards of business conduct relevant to our assignment, profession and position.
- Operate in accordance with generally accepted principles and standards relating to social and environmental responsibility, and internationally recognized human rights including laws preventing modern slavery.
- Co-operate with and contribute to the efforts of the appropriate authorities to combat all illegal activities such as, but not limited to, maritime fraud and the trade in banned drugs.
- Adhere strictly to the principles of honesty and integrity.
- Operate in a sound and honourable financial manner.
- Ensure that all the principal's business being handled is dealt with in confidence.
- Agree to provide every assistance to the principal and the master of the vessel in ensuring, so far as possible and subject to the limits of responsibility of the agent, that the vessel's statutory obligations to appropriate and relevant national, regional and international authorities are discharged in an orderly and timely manner.
- Ensure that brokers, acting for an owner, shall only offer firm a vessel for any one cargo at any one time.
- Ensure that charterers' brokers will only make firm bids of a cargo or cargoes to one vessel or one shipowners' broker at any one time.
- Ensure that a vessel or cargo will not, in any circumstance, be quoted unless duly authorised by a principal.
- Ensure that all business enquiries are bona fide by making all reasonable enquiries before placing them on the market.

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### ***Anti-Bribery and Anti-corruption***

- Not partake in any form of corruption or bribery, and ensure that business decisions are not influenced through any improper or illegal payments, either through cash, gifts, travel or anything else of value including intangible benefits.

- Refrain from presenting or receive any invitations or gifts, or anything of value, to/from 'any person' with an intention to gain any form of influence or advantage.

- Disclose to 'any person' any requests or pressure to provide bribes (any kind of benefit) in any form, either to Public Officials or any other parties, directly or indirectly, that may try to influence or provide an unfair business advantage.

### ***Conflicts of interest***

- Not engage in activities, hold or trade in assets that involve, or might appear to involve, a conflict between our personal interest and those of the company. Such conflicts of interest could compromise our liability to make correct business decisions. In case of doubt, we will discuss the situation with our respective manager.

### ***Protection of assets and information***

- Contribute to safeguarding Boe & Son's assets from theft, misuse or waste - Take necessary measures to protect, and keep Boe data - sensitive information confidential.

- Treat all sensitive and confidential information learned about our clients/other companies in the same manner as our own company's confidential and sensitive information.

### ***Maintaining accurate books and records***

- Maintain complete books and records that accurately reflect all business transactions and expenditures that are prepared in accordance with applicable laws and regulations.

- Make sure that our corporate and business records are completed accurately and honestly, so that the entries support the validity, accuracy and completeness of the information to our books of account.

- Make sure that our books, records and accounts are accurately and fairly reflected in our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities.

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#### ***Anti-competition and economic and trade sanctions***

- Not engage in any activities that could reasonably be construed as being anti-competitive, abusive or unfair, and comply with applicable anti-trust and anti-competition laws and regulations.

- Comply with laws and regulations governing the export or import of goods, products and services, and those relating to economic and trade sanctions, and anti-boycott.

#### ***Respect for people and nondiscrimination***

- Treat employees/colleagues with fairness and respect.

- Not tolerate discrimination against applicants, employees, colleagues or 'any person' based on race, color, religion, sex, age, marital status, national region, sexual orientation, citizenship status, or disability.

- Prohibit discrimination in decisions concerning recruitment, hiring, compensation, benefits, training, termination, promotions, or any other condition of employment or career development.

- Be committed to provide a work environment that is free from any type of discrimination or harassment, and the use of discriminatory slurs, unwelcome unsolicited sexual advances or harassment, or any other remarks, jokes or conduct that creates or fosters an offensive or hostile work environment will not be tolerated.

- Treat all clients, coworkers and outside firms with respect and civility.

#### ***Health and safety***

- they shall follow all safety, health rules and practices, which is implemented in the Company's policies and procedures in order to provide a safe healthful work environment.

All employees have a responsibility to report accidents, injuries and unsafe equipment, practices, or conditions to a designated safety representative, project supervisor or a more senior manager.

Furthermore, violent threatening or other unsafe behaviors are prohibited in the company's workplaces. Likewise, to maintain a safe workplace where employees can best perform their duties, the use or being under the influence of drugs and alcohol in the workplace is prohibited.

#### ***Environment***

- Conduct our operations safely and minimize the environmental impact of our business activities.

- Comply with applicable environmental legislation and permits.

#### ***Communities***

- Respect the local community and seek to prevent and mitigate adverse impact on local community.

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***Staff professional qualifications***

- Employ experienced professionally qualified staff to cover all aspects of the business being undertaken, so as to ensure the proper performance of all the functions of ship agent and shipbroker.

- Encourage such staff to improve their professional capacity qualifications in education, continuing education and courses.

***Corporate Responsibility*** - Encourage key personnel to:

- Develop strong professional relationships with all customers and principals, accept responsibility and accountability.

- Ensure a good and safe working environment for all concerned.

- Establish a stable business environment to ensure that all costs are economically based and provide a reliable service to clients.