Ethical Business Conduct Policy

The company is committed to maintaining the highest ethical standards in relation to the work we do and the services we provide. The Company’s reputation is one of its most valuable assets and responsibility lies with all employees to ensure that reputation is not damaged in any way.

It is Company policy that all staff ashore and afloat must not enter into any activity considered to be illegal, unethical, and immoral or of such nature that it can reflect adversely on the integrity of the Company.

Company policy prohibits:

* Commercial bribes, kickbacks or similar payoffs or benefits to be paid to any supplier or client.
* Gifts or hospitality are not to be accepted or offered. Employees are prohibited from receiving, directly or indirectly, anything of a significant value in connection with any transaction entered into by the Company, other than salary, wages or other ordinary compensation.
* Theft involving ship, cargo, stores and bunkers or any other action not in ship owner’s best interests.
* Any form of false or incorrect record keeping of official documents or records.
* Employees disclosing confidential or proprietary information outside the Company, either during or after employment, without the Company's authorisation to do so.
* Discrimination on account of race, colour, age, sex, religion and natural origin. All persons are to be treated with dignity and respect and they shall not be unreasonably interfered within the conduct of their duties and responsibilities.

Prior to accepting any engagement for services the Company shall disclose to any potential client any known conflicting interest it may have involving another client or employee. If any such conflict arises after commencement of services, that interest shall also be disclosed to the client.

The Company policy is to deal fairly with its clients, competitors, suppliers and employees. Unfair advantage shall not be taken of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

The Company is committed to operating to the highest ethical standards where commitments are honoured, personal responsibility is taken for actions and everyone is treated fairly and with respect.

**Media Policy**

It is Company policy to be open and honest with the media and provide factual information. However, all communications with the media are to be handled only by those trained to do so and it is a requirement of our Policy that there are a number of media trained personnel in each office. Employees must not provide information other than this or express any personal opinions.

**Social Media Policy**

The Company recognises the importance of social media as a forum for employees to post their own views and ideas.   The Company policy requires rules to be followed when posting an article or picture concerning V.Group or any vessel managed by V.Group companies. Material posted online can severely impact the Company and clients’ reputations and inaccurate or harmful material must not be posted. Staff must make it clear that views are their own and not as a Company representative.