

PERISCOPE SHIPPING PTE. LTD.



We Look Ahead, For You

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(Company Registration No: 202121439Z)

Anti-Bribery / Corruption Policy

This Anti-Bribery and Corruption Policy principles must govern our conduct in order to: a) conform to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and similar anti-corruption laws worldwide and b) more broadly, reinforce our intention and obligation to act honestly and ethically in all our business dealings.

This policy applies to all employees of Periscope.

Policy statement

Bribery and corruption are not only against our Company values; they are illegal and can lead to both the employee and the Company to fines and penalties, including imprisonment and reputational damage.

At Periscope, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity. Employees and representatives of the Company are expected to decline any opportunity which would place our ethical principles and reputation at risk. The Policy applies to non-government business partners as well as Government Employees if are interacted with. "Facilitation or grease payments" are payments that facilitate a normal governmental function, such as to expedite processing paperwork. While these types of payments may be accepted as "a cost of doing business" in some cultures, they are illegal and counter to our values.

Employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law. If you are offered a bribe from a person or entity doing business with or seeking to do business with the Company, report it immediately to Director/legal contact.

A handwritten signature in black ink, appearing to read "Shaminder Rahil", is written over a horizontal line.

Shaminder Rahil

Director

Periscope Shipping Pte Ltd



Dated: 20 Aug 2021