



# ETHICS POLICY STATEMENT



**The Clarkson group of companies (“the Group”) is the world’s leading provider of integrated shipping services with an exceptional breadth of expertise, especially in ship broking, finance, research, port services and other aspects of shipping. The Group is founded on a commitment to provide the highest quality of service to our clients while maintaining the highest level of integrity.**

## **OUR GOALS**

- To act fairly, honestly and with integrity at all times and in everything that we do, and to comply with all applicable laws.
- To treat our employees, clients, contractors and suppliers and other stakeholders fairly and with respect.
- To create a high-quality, equal opportunity working environment for all our employees, based on merit and free from discrimination, bullying and harassment.
- To respect human rights.
- To maintain accurate and complete books and records and uphold our system of internal controls.
- To provide relevant information to shareholders and the financial community on a transparent, accurate and timely basis.
- To earn the trust of all our stakeholders by acting consistently and reliably in accordance with this Ethics Policy Statement.

## **COMPLIANCE CODE**

We provide on-line, written and in-situ sanctions training to relevant employees.

Our Compliance Code (“Code”) sets out both the Group’s standards of conduct and certain of its legal obligations covering inter alia bribery/corruption, insider dealing, confidentiality, conflict of interest and sanctions/embargoes and reporting.

Given that the Group has operations in many countries, employees, directors, non-executive directors and officers (collectively “Employees”) doing business internationally must:

- Comply with the Code.
- Comply with applicable laws and regulations in the countries concerned (the “Laws”).

## **TRAINING**

The Group is committed to providing training to help embed this Ethics Policy and our Code of Conduct.

