

PERISCOPE SHIPPING PTE. LTD.



We Look Ahead, For You

Registered office:

7, Siglap Road

13-58

Singapore 448909

Phone: +65 66676870

Phone: +65 82365755

Web: www.perisopeshipping.com

(Company Registration No: 202121439Z)

Code of conduct and Fraud

Employee Code of Conduct and Fraud company policy outlines our expectations regarding employees' behaviour towards their colleagues, supervisors and overall organization. We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment. This policy applies to any fraud, irregularity, or suspected irregularity, involving employees as well as shareholders, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Periscope Shipping Pte Ltd.

This policy applies to all employees of Periscope.

Policy statement

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image. We won't allow any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

All employees should treat our company's property, whether material or intangible, with respect and care. Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties. All employees must show integrity and professionalism in the workplace:

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. All employees should read and follow our company policies.

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the Director, who coordinates all investigations with the Legal Department and other affected areas, both internal and external.

PERISCOPE SHIPPING PTE. LTD.



We Look Ahead, For You

Registered office:

7, Siglap Road

13-58

Singapore 448909

Phone: +65 66676870

Phone: +65 82365755

Web: www.perisopeshipping.com

(Company Registration No: 202121439Z)

The terms Fraud, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the company
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment.

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company.

Employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law.

The management of Periscope is committed to complying with all laws. Any employee who violates the rules in this Policy or who permits anyone to violate those rules may be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to personal civil or criminal fines.

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: 20th Aug 2021