



VIKEN SHIPPING AS

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Anti-Bribery and Corruption Policy

INTRODUCTION

In the Viken Shipping Group we believe that demonstrating the highest ethical standards in conducting business is essential to the behaviour of each employee in respect of their personal conduct within their working environment. We recognise that any involvement in an act of bribery or corruption will adversely reflect on our reputation. As a global organization, the provisions of the various anti-bribery legislation that exist today (such as the US "Foreign Corrupt Practices Act" are likely to be applicable to the Viken Shipping Group as some of our customers and suppliers reside in these varied jurisdictions, and they in turn require us to confirm in writing that we comply with their anti-bribery laws in order for them to do business with the Viken Shipping Group. In addition, anti-bribery provisions are being adopted in commercial practice and are likely to become universal. Furthermore, Viken staff are obliged to comply with the laws of the countries in which they do business. Viken commits to a "zero-tolerance" approach. Bribery is illegal and unacceptable in our organization.

PURPOSE

To set down the policy for Viken Shipping Group members in relation to anti-bribery laws.

SCOPE

In this policy the word "Viken Shipping Group" or "Group" means any wholly owned subsidiary, joint venture partner of the Viken Shipping Group, associate or affiliate company within the Viken Shipping Group of companies. This policy applies to all employees of the Group, and any third party and their members, contractors, subcontractors, associates and affiliates who act on behalf of the Group. Third parties such as contractors, agents or consultants engaged to work on behalf of the Group must be made aware of this policy and it shall be a condition of such engagement that they, and their employees, acknowledge and adhere to this Policy.

RESPONSIBILITY AND ENFORCEMENT

All employees of the Group are responsible for complying with this Policy. The Directors of each business unit is responsible for the implementation and the enforcement of this Policy. He / she shall ensure that all employees, and any third party who has a business relationship with the Group, are acknowledged and confirmed to comply with this Policy.

Failure to comply with this Policy will be regarded as a serious breach of Group discipline and may result in summary dismissal or disciplinary action against the employee concerned.



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THE ANTI-BRIBERY POLICY

The Group prohibits offering, giving, requesting or receiving any bribe, either directly or indirectly through a third party, whether in cash or other inducement with the intention of:

- influencing the judgment of others regarding any business of the Group;
- gaining an improper advantage when conducting business transactions;
- Influencing the use of authority, discretionary or otherwise, by any Government official to gain business, or a business advantage.

FACILITATION PAYMENTS

Facilitation and extraditing payments are prohibited. The purpose of these payments are to expedite or to secure the performance of a routine government action. An employee of the Group shall not pay any type of facilitation payment in cash or any other form of inducement either directly or indirectly to an official of the local government. Should the circumstance become inevitable, the employee will obtain advice from their reporting director and request the receipts and identification details of the official making the demand. Details of any action taken or to be taken must be immediately reported to the reporting director of the employee.

Proper and adequate written guidelines and procedures should be obtained in respect of facilitation payments if the areas in which the Group do business face a higher risk of violation of the applicable anti-bribery laws. This Policy does not apply to situations where the life, liberty or health of any Group employee or employee of an engaged third party is jeopardized.

INTERPRETING THE POLICY

It is not the intention of the Policy to prevent the following activities, particularly in relation to our role as shipowner:

- Normal and appropriate hospitality and promotional expenditure;
- The giving and receiving of ceremonial gifts on a festival or at another special time;
- The use of any recognised and official fast-track process which is publicly available to all on payment of a fee.

Such hospitality, promotional expenditure or gifts must be in moderation and not place any expectation on the recipient to reciprocate either in kind or by performing, or failing to perform, any other task in return. If there is any doubt as to whether an action might constitute a violation of the Applicable Anti-Bribery Laws, the matter should be referred to managing director for a decision **before proceeding**.



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PREVENTING AND REPORTING BRIBERY

All employees of the Group have the responsibility to prevent, detect and report bribery. Should you have any suspicion of bribery or violation of the applicable anti-bribery laws committed by or against an employee of the Group, agent or other third party acting on behalf of the Group, it must be reported to the management as soon as possible.

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