



NATIONAL AND INTERNATIONAL TRADE



Green Ocean* is committed to free, fair and ethical enterprise. You must follow all applicable trade laws and ensure Green Ocean*'s core values are applied in all your dealings. A failure to comply with these laws and regulations can severely damage our business and expose us to criminal charges. You could face dismissal, fines and imprisonment.

ANTITRUST (COMPETITION) LAW

Antitrust law protects free enterprise and prohibits behaviour that limits trade or that restricts fair competition. These laws apply to every level of business. They combat illegal practices like price-fixing, market-sharing or bid-rigging conspiracies, or behaviours that aim to achieve or maintain monopoly. Green Ocean* does not tolerate violation of antitrust laws.

Your Responsibility

You must not agree with competitors of Green Ocean* to fix price or any elements of price (such as discounts, rebates or surcharges). You must not agree with others not to compete in particular markets or for particular customers or accounts. You must not rig bids or tenders, and you must not agree with others to boycott any customers or suppliers except in connection with internationally imposed sanctions. Anti-competitive behaviour will damage Green Ocean*'s business and reputation for fairness and honesty. Anti-competitive practices are unacceptable. They are illegal in most countries and can lead to heavy fines and imprisonment.

The Principles

- Do not agree, even informally, with competitors on pricing, customers or markets without a lawful reason.
- Decisions on Green Ocean*'s pricing, production, customers and markets must be made by Green Ocean* alone.
- Do not discuss with competitors:
 - which suppliers, customers or contractors Green Ocean* deals and will deal with; or
 - which clientele Green Ocean* intends to sell to or on what terms Green Ocean* will deal.
- Leave industry meetings if competitively sensitive issues arise and ensure your departure is noticed. Report the matter to Green Ocean*
- Tell Green Ocean* if you know of any potentially anti-competitive practices or if you are uncertain whether practices are legal or not.

Challenge Yourself

- Was competitively sensitive information discussed at an industry meeting (either directly or indirectly)?
- Have I tried to set the resale price of my dealers or distributors?
- Are our suppliers or customers involved in any anti-competitive behaviour?
- Do I know what my line reports are doing?
- Have I obtained the relevant legal advice?



EXPORT CONTROLS AND SANCTIONS

Export Controls and Sanctions laws give countries legal control over the sale, shipment, electronic transfer or disclosure of information, software, goods and services across national borders. Exports include transfers electronically, through discussions or visual inspections, and not only through traditional shipping methods.

Your Responsibility

Think carefully about the potential impact of export control laws and sanctions before transferring goods, technology, software or services across national borders. Remember that controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and goods. You must know which of these controls or sanctions may result in restrictions or prohibitions on the way you conduct business. Green Ocean* could face criminal charges, fines and loss of export privileges if you do not comply with the relevant controls and sanctions. You could face dismissal, fines or imprisonment.

IMPORT CONTROLS AND SANCTIONS

Import Controls and Sanctions laws give countries legal control over the purchase, shipment, electronic transfer or disclosure of information, software, goods and services into their jurisdiction. Import controls apply to Green Ocean* as a company and also to you personally.

Your Responsibility

You must meet import requirements when bringing goods or services into a country, ensuring duties, levies and taxes are paid. You must not bring restricted goods into a country without declaring them. You must seek advice if you have doubts about an import. You must not import prohibited goods. Failure to observe import control laws and sanctions can cause operational delays and damage business. Green Ocean* could also face legal consequences, including fines and loss of privileges. You could face dismissal, fines or imprisonment.

The Principles (FOR EXPORT AND IMPORT CONTROLS AND SANCTIONS)

- Make sure you have proper authorisation before exporting or importing goods, technology, software or services across national borders.
- Know your customers and suppliers and how they will use the goods, technology, software or services that you supply to them.
- Seek advice before doing business with a country or individual if sanctions apply.
- Do not import from a country to which sanctions apply, into a country which applied those sanctions.
- Keep up to date with changing rules.
- Get advice if you have doubts about export and import controls or sanctions.

Challenge Yourself (FOR EXPORT AND IMPORT CONTROLS AND SANCTIONS)

- Do you understand the applicable export and import controls?
- Do you know which countries, entities, individuals and goods have had sanctions applied?
- Have the relevant duties, levies and taxes been paid?
- Have you obtained all required permits?
- Are you importing or exporting restricted or prohibited goods?