



## **Anti-Corruption Compliance Policy**

Bibby Ship Management and its subsidiaries (collectively "the Company") embrace the highest standards of honesty, ethics, and integrity as core business values, and will do business only in lawful and ethical ways.

The Company corporate policy is to abide by all laws applicable to the jurisdictions in which it operates. The Company expects both its employees and anyone doing business on its behalf to comply with all applicable laws.

The Company expressly prohibits bribery in all its forms. The offering, promising, giving, accepting or soliciting of bribes or any form of gift/payment or inducement that could be considered a bribe is totally unacceptable, whether involving public officials or anyone else, and whether it happens in the UK or overseas. All directors, officers and employees, including all directors, officers and employees of each Company, subsidiary, branch and overseas office, are responsible for compliance with this policy.

Adherence is mandatory. Violation of this Policy - and / or failure to report a violation - may lead to disciplinary action which could result in dismissal and reporting to the appropriate authorities.

No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes or reporting an incident of bribery and whenever necessary, will receive full support from the Company when upholding this Policy.

Signed: .....

Director  
Bibby Ship Management Ltd

Date: .....

1st July 2011

Signed: .....

Managing Director  
Bibby Ship Management Group

Date: .....

1st July 2011