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SAFETY MANAGEMENT MANUAL According to IMO Resolution A.741(18), as amended – ISM Code				
CODE OF ETHICS & CODE OF CONDUCT ANNEX TO COMPANY SQE POLICY				
This annex is reprinted when necessary. It is not subject to Certifying Body (RINA) approval and its change should not be recorded in the manual's revisions checklist.				

CODE OF ETHICS AND CODE OF CONDUCT

The Code of Ethics and Code of Conduct (referred to hereafter also as the Codes) are based on Company's beliefs and values establishing its commitment to honesty and integrity. The main function of the Codes is to make the fundamental values and principles, which guide the activities of the Company, known within the Organization and its managed vessels and to all agents, contractors, suppliers and other third parties, the Company cooperates with.

The Codes apply to the whole Company and managed vessels.

The aim of the Codes is to ensure that the Company is united by strong and clear values and the highest standards of behaviour and to orient individual conduct with the purpose of confirming the image of correctness, prestige and the good reputation, which have always been the assets of our Company. The Company expects from all personnel behaviour in line with the established principles, laws, rules and standards in order to protect its image, reputation and the quality of the services provided. All employees are responsible to comply with the Codes and actively support their principles. The Managers are responsible to ensure implementation and management of the Codes in their area of interest.

The development, implementation, applicability and relevance of the Codes are reviewed during internal audits and management reviews.

Any employee who fails to comply with the Codes is subject to disciplinary action up to and including dismissal.

- The Company's shore staff and seagoing personnel shall not be involved in any kind of harassment, abuse, discrimination or child pornography.
- The Company's personnel shall not conceal any identified unsafe act or event which affects or could affect human health and safety, the environment and the property.
- The Company's personnel shall carry out their duties in a professional and impartial manner. All Company's employees shall act in honesty and good faith.
- All information regarding Fratelli d'Amico Armatori operations, projects, reports or any work carried out shall be treated as business confidential to the extent that such information does not conflict with Company's policy for HSEQ excellence and is not already disseminated or made generally available to third parties.
- Any kind of offer, gift or bribe in any form direct or indirect, including kickbacks is strongly prohibited in all Company's operations. Furthermore, the Company prohibits the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from agents, contractors, suppliers or employees of any such party or government officials.
- Procurements are conducted in a fair and transparent manner.

RESPONSIBILITIES

Company's Management provides evidence of commitment to the development and implementation of the SMS and continually improving its effectiveness by:

- establishing the Company's policies and objectives;

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- communicating the importance of meeting the customer's as well as the statutory and regulatory requirements; and
- conducting management reviews and internal audits.

The Company determines, provides and maintains the infrastructure needed to achieve the specified or implied requirements of its customers. Furthermore, the Company determines and manages the work environment, both on board the ships and in the office, as needed, to achieve conformity to the requirements of the provided services.

The Company's Management has appointed a member of the management as the DPA who, irrespective of other responsibilities, has defined roles, responsibilities and authority to:

- provide a link between the Company and those aboard;
- liaise with external parties on matters concerning establishment, approval, and timely auditing of the SMS to comply with applicable Codes, standards or industry guidelines;
- monitor the HSEQ aspects of the operation of each ship and provide adequate support;
- verify that the SMS is established, implemented and maintained, as appropriate;
- organise management reviews and report to the Management on the performance of the SMS, including recommendations for improvement;
- promote the Company's HSEQ culture; and
- provide awareness of meeting customers' as well as statutory and regulatory requirements.

The DPA has direct access to the Management regarding his responsibilities and support for the SMS implementation. The Company provides adequate resources and support to enable the DPA to carry out his functions. The identity of the DPA is made available to all persons working under the Company's control.

The Managers of the various departments are responsible for implementing the requirements of the SMS and for ensuring that personnel at all levels of the organization understand the Company's Policies. All Managers ensure that they have the necessary equipment, resources, personnel and capability to achieve the required Company's standards and quality of service.

The Master has total responsibility for the operation, seaworthiness and safety of the vessel at all times both at sea and in port. He has the overriding authority and responsibility to act decisively and according to his best judgement, in order to prevent:

- Injury to Personnel or loss of life.
- Damage to the environment.
- Damage to property (including vessels, cargo and other third-party property).

Furthermore, the Company ensures that each ship is manned with qualified, certified and medically fit seafarers, in accordance with national and international requirements.

The Company has also established procedures to ensure that new personnel and personnel transferred to new assignments related to safety and protection of the environment are given proper familiarization with their duties. Ships' personnel receive relevant information on the SMS in a working language understood by them, and are able to communicate effectively in the execution of their duties.