

Code of Ethics and Code of Conduct

Samos Steamship (Cyprus) Ltd. is committed to promoting an honest and trustworthy working environment, both on board and ashore, to compliment the Company's procedures and to reinforce the vision of business ethics within the Company.

The Code of Ethics and Code of Conduct (referred to hereafter also as the Codes) is 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.**

All employees of the company are required to:

- *Act with integrity, competence, dignity and in an ethical manner when dealing with the public, clients, employers and colleagues;*
- *Be proactive;*
- *Practice and encourage others to practice in a professional and ethical manner that will reflect credit on the company's employees and their shipping profession;*
- *Strive to maintain and improve their competence and the competence of others in the profession;*
- *Use reasonable care and exercise independent professional judgment.*
- *All personnel shall not conceal any identified unsafe act or event which affects or could affect human health and safety, the environment and the property.*
- *All information regarding the company's 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 safety and environmental 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, contactors, suppliers or employees of any such party or government officials.*
- *Procurements are conducted in a fair and transparent manner.*

The Managing Director, Heads of Departments and ships' Masters are responsible for ensuring that the standards set forth by this policy are communicated to their teams and that their own conduct sets a good example in this respect.

Adherence to the Company's Ethics Code makes each of us responsible for bringing suspected violations of applicable standards, policies, regulations or requirements to the attention of the responsible person. Raising such concerns is a service to the Company and will not jeopardize one's position or employment.

The Company expects all individuals to comply with this policy at all times and to protect the Company's reputation.

Please be aware that violation of this policy may be grounds for disciplinary action up to and including termination of employment.