

ANTIBRIBERY POLICY

The Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented in all business dealings and relationships wherever it operates. **The Company has a zero-tolerance approach to bribery and corruption activities.**

This Antibribery and Anticorruption Policy applies to all Company & Company Subsidiary Employees at any level (Onboard and Ashore, Permanent or Temporary), including Senior Executive and Financial Officers and members of the Board of Directors , as well as Contractors, Trainees, Seconded Staff, Agents and any other persons associated with the Company (including Third Parties).

In the context of this Policy, “Third Party” refers to any individual or organization the Company meets and works with. Any arrangements the Company makes with a Third Party, is subject to clear Contractual Terms, including specific provisions that require Third Party to comply with minimum standards and procedures relating to anti-bribery and anti-corruption.

Bribery refers to the illegal act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage, in order to induce or influence an action or decision.

Corruption is the misuse of entrusted power for private gain involving bribery.

Gifts and Hospitality: The Company will accept appropriate gestures of hospitality and goodwill as long as the offered gift meets the following requirements:

- It is not made with the intention of influencing an action or decision.
- Is not made with the expectation of a return-favour.
- It is in compliance with Local Law.
- It is given in the name of the Company, not the Individual’s name
- It does not include cash or cash equivalent (i. vouchers for luxury travel, excessive entertainment)
- It is appropriate for the circumstances (i.e small gifts around Christmas) but of not excessive value.
- It is offered and received openly, not secretly
- It is not selectively given to Key& influential Persons of the Company, clearly with the intention of directly influencing them.

The intention behind the gift being given /received should always be considered.

Where it is inappropriate to decline the offer of a gift (i.e when meeting with an individual of a certain religion/culture who may feel offended by the decline) the gift may be accepted, as long as this is declared to the Company.

Facilitation Payments: The Company does not accept and will not make any facilitation payments with the purpose of expediting routine governmental actions.

Political Contributions: The Company will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates since such donations may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions: The Company accepts and encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions– and agrees to disclose all charitable contributions it makes, as long as it ensured that they are not used to facilitate and conceal acts of bribery.

Employee Responsibilities

All Company Employees are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to or imply a breach of this anti-bribery policy. If any employee has reason to believe or suspect that an instance of bribery or corruption has occurred or is about to occur, he/she should report it at once to the Company at the e-mail address

openreporting@prime-marine.net The Company reserves the right to terminate a contractual relationship with an employee if this Policy is breached.

Signed by COO:



George A. Kouleris