



ETHICAL CONDUCT POLICY

Policy Commitment: Ethical Conduct, we will pursue our business with integrity, respecting the different cultures and the dignity and rights of individuals wherever we operate.

PT. Perusahaan Pelayaran Equinox company promote universal respect for and observance of human rights, and fundamental freedoms for all, without distinction as to ethnicity, religion, gender, language as well we accept seafarers from all educational institutions without distinction to one alma mater. The promotion and protection of all human rights is a legitimate concern of business. In our actions and our dealings with others, we will:

- **Respect the rule of law.**
- **Promise only what we expect to deliver,** make only commitments we intend to keep, not knowingly mislead others and not participate in or condone corrupt or unacceptable business practices.
- **Fulfil our obligations and commitments,** treat people according to merit and contribution, refrain from coercion and never deliberately do harm to anyone.
- **Act in good faith,** use company assets only for furthering company business and not seek personal gain through abuse of position in the company.
- **We will respect the law in the countries and communities in which we operate.** This will include competition and antitrust laws and the Foreign and Corrupt Practices Act. Where the law is unclear or conflicting, we will take expert advice but will always seek to act in accordance with these commitments.
- **We will never offer, pay, solicit or accept bribes in any form, either directly or indirectly.**

- **We will hold no secret or unrecorded funds of money or assets. We will only give or accept gifts and entertainment that are for business purposes and are not material or frequent.**
- **We will avoid situations where loyalty to the company may come into conflict with personal interests or loyalties.** If such a conflict does arise, it should be declared in writing to more senior management, who must make sure that the individual is insulated from any decision making or operation in the area of the conflict of interest.
- **Company performance will always comply fully with the US Foreign Corrupt Practices Act (FCPA)**
- **We will not employ forced labor or child labor.** We will not use child labor in our own operations or in the provision of our goods or services and we will seek to facilitate the transition to alternatives to child employment, such as apprenticeships, training and further education.
- **Before we make major investments in a new area, we will evaluate the likely impact of our presence and activities.** These assessments will consider the likely impact of major developments on local communities and indigenous peoples, local infrastructure and the potential for conflict and its implications for security.
- **Fees for services rendered by third parties, including agents and consultants, must be for legitimate business purposes that are demonstrably commensurate with the service provided. We will not choose business partners who contravene these commitments.** We will not employ agents to carry out actions that conflict with these commitments. In joint operations, we will apply these commitments where we are operators; where we are not, we will seek to influence our partners such that the joint operation adopts similar commitments.

Date: March 2024



Board of Director

Risk assessment

5. PT. Perusahaan Pelayaran Equinox will assess every third party prior to doing business with them in respect to the aforementioned risks the third party may expose PT. Perusahaan Pelayaran Equinox.

Due Diligence

6. PT. Perusahaan Pelayaran Equinox will conduct due diligence on every third party prior to doing business with them based on the results of the initial risk assessment. The level of due diligence conducted on a third party will be proportionate to the risks identified and to the possibility to perform the due diligence according to the type of third party. PT. Perusahaan Pelayaran Equinox will periodically review and amend the arrangements with a third party to mitigate anti-bribery and corruption risks identified as part of PT. Perusahaan Pelayaran Equinox ongoing compliance monitoring. The renewal period for reviewing and updating written agreements with a third party will be no longer than three years. Mitigating strategies may include, but there are not limited to:
 - a. Periodically receiving defined information from a third party supporting its compliance with anti-bribery policies.
 - b. Periodically exercising PT. Perusahaan Pelayaran Equinox audit rights.

Monitoring

7. PT. Perusahaan Pelayaran Equinox will conduct red flag analysis with respect to bribery and corruption risks associated with a third party on an ongoing basis during the business relationship. Based on the results of these analyses PT. Perusahaan Pelayaran Equinox will define and implement appropriate strategies to mitigate risk throughout the duration of the relationship with a third party.

Training

8. PT. Perusahaan Pelayaran Equinox will provide adequate training and coaching to its employees that have a responsibility to manage any part of the relationship with a third party.

Reporting

9. PT. Perusahaan Pelayaran Equinox welcomes and provides for third parties to report incidents or suspicions of unethical behaviour through Complaint Form and/or whistle blowing.

General principles of due diligence

10. If as a result of the due diligence it is concluded that the risks associated with the third party cannot be managed to an appropriate level by PT. Perusahaan Pelayaran Equinox, the third party must be rejected and any business relationship with it discontinued.
11. The due diligence conducted on a third party must be approved by the appropriate level as directed in PT. Perusahaan Pelayaran Equinox due diligence procedure.
12. If there are any material changes to the risks associated with a third party, then the Due Diligence already conducted must be updated based on the new information. This will require the original risk rating of the third party to be reconsidered and additional due diligence procedures to be conducted as appropriate.

Guidance and reporting

13. For further guidance please contact PT. Perusahaan Pelayaran Equinox, Director and QHSE Manager.
14. If you would like to make an anonymous report of violations or suspicions of violations of this policy, you can do so through available channels of Complaint Form and/or whistle blowing.

Alternatively, you can speak directly to:

- Board of Director
- QHSE Manager
- Human Resources

Date: March 2024



Board of Director