



**VS TANKERS**

**Anti-Bribery, Corruption &  
AML (Anti-Money Laundering)  
Policy**

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# **VS TANKERS**

## **Anti-Bribery, Corruption & AML (Anti-Money Laundering) Policy**

## 1. OBJECTIVE & POLICY STATEMENT

- 1.1 VS TANKERS is committed to doing business the right way. VS TANKERS aims to comply at all times with applicable local and international anti-bribery, anti-corruption and anti-money-laundering (AML) laws and regulations, in all countries where VS TANKERS carries on business (collectively “Laws”). The principles in this anti-bribery, anti-corruption and AML policy document (the “Policy”) apply to VS TANKERS’s management, staff, personnel and representatives, and to the full range of VS TANKERS’s business activities around the world, including both shipping, chartering and VS TANKERS’s other commercial trading activities.
- 1.2 In addition to legal obligations, VS TANKERS believes that long term, successful business relationships are built on honesty, integrity, the strength of VS TANKERS’s services, and business being conducted ethically and legally. VS TANKERS is therefore also committed to doing business and engaging with commercial counterparties who also abide by AML, anti-bribery and anti-corruption laws and regulations.
- 1.3 This Policy is intended to help VS TANKERS, and its management, employees, staff and representatives, to identify and understand what money laundering, bribery and corruption are and where these may arise, in order to help them make the right decisions in performing their professional duties and when conducting commercial activities with counterparties. This Policy provides rules and guidance for VS TANKERS’s staff, personnel and also for when dealing with any third parties or commercial partners engaged in business with VS TANKERS, in relation to expectations of ethical standards and to ensure compliance with the Laws of any country.

## 2. STANDARDS OF BUSINESS CONDUCT

In support of this commitment, VS TANKERS seeks to maintain a culture of openness, accountability, and professional ethical conduct (both internally and towards external counterparties). Prompt action will be taken to address any illegal or unethical conduct involving anyone working for or on behalf of VS TANKERS. Conduct or activities that amount to a breach of law or trust, or otherwise fall below high standards of ethical business conduct and professional behaviour will not be tolerated. It is the responsibility of all VS TANKERS employees, staff and representatives to ensure that they report any infringement or suspected infringement or breaches of any applicable laws or breaches of high standards of ethical business conduct involving VS TANKERS, to their Line Manager.

## 3. ANTI-BRIBERY & CORRUPTION: PROHIBITION AGAINST BRIBERY OR IMPROPER PAYMENTS

- 3.1 VS TANKERS staff, personnel and business partners or associates are prohibited from making or receiving bribes in connection with VS TANKERS’s business; and offering or receiving any financial or other advantage to or from another party with the intention to influence or reward the improper or illegal performance of a commercial activity. Bribes can take on many shapes and forms but typically they involve *corrupt intent*.
- 3.2 There will usually be a quid pro quo – that both parties will benefit from, and includes but is not limited to, *a direct or indirect promise, offering or authorization of anything of value or the offer or receipt of any kickback fee, reward or other advantage, in order to cause the person to perform or omit to perform an act which is illegal or contrary to his/ her legal or professional duties*. The use of intermediaries (including agents) for the payment of bribes or other improper payments is prohibited.
- 3.3 VS TANKERS staff, personnel and business partners or associates, should understand that:
  - (1) bribery consists of the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal or unethical;
  - (2) corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business outside the realm of government;
  - (3) acts of bribery or corruption are designed to influence the individual in the performance of their duty and induce them to act dishonestly, illegally or contrary to their professional duties.
- 3.4 If any VS TANKERS staff, personnel and business partners or associates are found to have breached this paragraph, disciplinary action may be taken against such employee or staff, and any commercial agreement or

arrangement may be terminated in the case of business partners, counterparties or associates.

- 3.5 There are no exceptions to the prohibition contained in this Policy against bribes or improper payment activity. The fact that VS TANKERS staff, personnel and business partners or associates, for example, may be pursuing business in a country where that individual believes corruption is widespread, is part of the culture or way of doing business, or where legal standards governing bribery are unclear, or in a transaction where an employee has been solicited for a bribe, will not serve as excuses for engaging in improper or illegal payment activity.
- 3.6 VS TANKERS's business activities with international counterparties, shall be done in compliance with applicable international standards such as those contained in the anti-bribery and anti-corruption laws such as the *U.S. Foreign Corrupt Practices Act 1977*, the *UK Bribery Act 2010* and the *Sanctions and Anti-Money Laundering Act 2018*.
- 3.7 Additionally, VS TANKERS carries on business in the UAE, and all of VS TANKERSs staff, representatives and employees are obliged to observe and comply with local UAE laws and regulations such as the UAE's *Federal "Penal Code" (Federal Law No 3 of 1987)*, which prohibits acts of bribery involving public officials and also individuals employed within the private sector in the UAE. It is a crime under UAE law and persons may be liable for imprisonment or a fine. The UAE has also adopted the United Nations Convention against Corruption, and the Convention's definition of a "bribe" is incorporated into the national legislation.

#### 4. CONFLICTS OF INTEREST

VS TANKERS's employees, personnel and representatives shall avoid placing themselves in situations, that does or could create a conflict of interest, that could or does interfere, prevent or adversely affect their professional and ethical judgement, duties and obligations towards VS TANKERS and VS TANKERS's business or commercial interests. A conflict of interest may arise where the staff, employee or representative is unable to perform or conduct himself/ herself objectively and in a manner with VS TANKERSs best interest in mind, due to some personal gain, benefit, payment or advantage which he/ she may obtain, at the expense of VS TANKERS's interest.

#### 5. ANTI-FRAUD

VS TANKERS and its employees, personnel and representatives shall not partake in, facilitate or commit any fraudulent activity, practices or behavior, and must at all times maintain the highest standards of professional business ethics and conduct.

#### 6. ANTI-MONEY LAUNDERING

- 6.1 "**Money Laundering**" is understood to be "*any financial or banking transaction aiming at concealing or changing the true nature of the funds which are originally obtained by illegal or criminal means, by then passing them through banking and financial system (or other commercial activities) to make them appear legitimate or otherwise "legal", and then injecting and investing them into other "legal" commercial activities to disguise their illicit or criminal origin*".
- 6.2 VS TANKERS and its employees, staff and representatives are committed to ensuring that it only conducts legitimate and legal commercial activities and business engagements with its counterparties. Failing to do so could cause serious harm to VS TANKERSs reputation, commercial relationships, and other legal consequences such as fines, penalties or imprisonment.
- 6.3 Some examples of "money laundering" includes, but is not limited to:

1. *the conversion/ transfer of property (including money), knowing or suspecting that such property originates from criminal or unlawful activity ("**criminal property**")*, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;
2. *conducting a financial transaction which involves criminal property;*
3. *the acquisition, possession or use of criminal property;*
4. *financially benefitting from the carrying on of unlawful and illegal activity, and promoting or representing it as a lawful or legitimate activity;*
5. *concealing, hiding, or disguising the true nature, source, location, disposition, movement, rights with respect to, ownership*

*or control of criminal property.*

#### 6.4 Some “red flags” or suspicious activity to be aware of:

1. *A Counterparty providing false information or reluctant to provide complete information for KYC purposes (such as valid trade license, details of shareholding/ ownership, place of incorporation or commercial trading);*
2. *Orders or purchases that are completely inconsistent with the customer’s official licensed trade or business;*
3. *Payments to or from third parties that have no logical connection or relation with the customer or transaction;*
4. *Payment to or from countries considered high risk for money laundering or terrorist financing;*
5. *Wire transfer activity that is not consistent with the business activities of the customer, or which originates or terminates with parties completely unrelated to the transaction;*
6. *The beneficiary bank account name is not the same as the counterparty’s registered entity name, or the invoicing supplier.*

6.5 Additionally, VS TANKERS carries on business in the UAE, and all of VS TANKERSs staff, representatives and employees are obliged to observe and comply with local UAE AML laws and regulations, such as the *The Federal Decree Law no. (20) of 2018 on Anti-Money Laundering, and its Implementing Regulation and Executive Resolutions (“the UAE AML Law”)*. Under the UAE AML Law, *any person, having the knowledge that the funds are the proceeds of a felony or a misdemeanor, and who willfully commits any of the following acts, shall be considered a perpetrator of the crime of money laundering: transferring or moving proceeds or conducting any transaction with the aim of concealing or disguising their illegal source; acquiring, possessing or using proceeds upon receipt; or assisting the perpetrator of the offense to escape punishment.*

#### 7. **ANTI-FINANCING OF TERRORISM AND FINANCING OF ILLEGAL ACTIVITIES**

VS TANKERS, it’s staff, employees and representatives will never engage in any commercial activity for the purposes of terrorist financing or for the benefit of any terrorist organizations or activities.

#### 8. **RESPONSIBILITY & COMPLIANCE**

It is the responsibility of all VS TANKERS staff, employees, representatives, and personnel to understand and comply with this Policy.

#### 9. **BUSINESS PARTNERS AND DUE DILLIGENCE**

As part of achieving the objectives of this Policy, VS TANKERS will ensure that it conducts business with ethical business partners, and does not breach any anti-bribery, anti-corruption, and AML laws. VS TANKERS will conduct KYC (“know your client”) checks and screening on business partners, counterparties or commercial associates and shall exercise an appropriate level of due diligence.

#### 10. **COMMITMENT TO COMPLIANCE**

VS TANKERS will exercise appropriate levels of due diligence and shall implement relevant KYC (“know your customer”) processes, procedures and screening on counterparties, to ensure that any commercial activities it engages in, or any funds it may receive or pay to counterparties, are legitimate and not in breach of any anti-money laundering, anti-bribery or corruption laws or regulations.

This includes, but is not limited to:

- (1) *Collecting relevant documents and forms from the counterparty as part of a KYC counterparty due diligence procedure, to identify and verify the legitimacy of the counterparty’s identity, ownership structure and business activities;*
- (2) *Identifying, where possible, the UBO (ultimate beneficial owners), directors or controlling management of the counterparty, and taking adequate risk-based measures to identify the ownership structure where relevant and appropriate;*
- (3) *Using KYC AML screening programs such as World Check, on the relevant entity or persons, to identify potential PEPs (politically exposed persons) or any other money-laundering or terrorist financing risks associated with that entity or person;*
- (4) *Ongoing and regular updating and monitoring of KYC records on counter-parties, and monitoring any significant or irregular changes in the counterparty’s core commercial activities, ownership structure or banking details.*