



# Focal Ethics Policy

## Introduction

At Focal, we are committed to upholding the highest ethical standards in every aspect of our business. This Ethics Policy serves as a guiding framework to ensure that all employees, contractors and business partners conduct themselves with integrity, fairness and accountability. Our commitment to ethical practices ensures trust with our customers, stakeholders and the communities in which we operate.

## Purpose and Scope

The purpose of this Ethics Policy is to:

- Establish clear expectations for ethical behaviour across all Focal operations.
- Promote a culture of integrity, transparency and respect.
- Ensure compliance with applicable laws, regulations and industry standards.
- Provide guidance on addressing ethical dilemmas and reporting misconduct.
- This policy applies to all employees, contractors, agents and business partners globally.

## Core Ethical Principles

### 1. Integrity

We act with honesty and transparency in all business dealings, ensuring that our actions align with our values and commitments.

### 2. Accountability

We take responsibility for our actions and decisions, ensuring that we fulfil our obligations to customers, colleagues and stakeholders.

### 3. Respect

We treat everyone with dignity and fairness, promoting an inclusive and collaborative work environment.

### 4. Compliance

We adhere to all applicable laws, regulations and industry standards, including anti-bribery and corruption laws, data protection laws and maritime regulations.

## Specific Ethical Guidelines

### 1. Anti-Bribery and Corruption

Focal strictly prohibits bribery, facilitation payments and other forms of corruption. Employees and representatives must:

- Never offer, give, request or accept bribes.
- Report any suspected incidents of bribery or corruption immediately.
- Adhere to the UK Bribery Act, FCPA and other relevant anti-corruption laws.



## 2. Conflicts of Interest

Employees must avoid situations where personal interests could conflict with the interests of Focal. This includes:

- Disclosing any potential conflicts of interest to management.
- Avoiding personal relationships or financial interests that could compromise objectivity.

## 3. Confidentiality

Protecting confidential information is essential to maintaining trust. Employees must:

- Safeguard sensitive company, client and stakeholder information.
- Refrain from sharing confidential information without proper authorisation.
- Comply with data protection laws such as GDPR.

## 4. Ethical Use of Resources

Focal resources, including time, funds and assets, must be used responsibly and for legitimate business purposes.

## 5. Workplace Conduct

We are committed to fostering a respectful and inclusive workplace. Employees must:

- Avoid discriminatory, harassing or abusive behaviour.
- Promote diversity and inclusion in all aspects of the business.

## Reporting and Whistleblowing

Focal Shipping encourages employees and stakeholders to report unethical behaviour or policy violations through [management@focalshipping.com](mailto:management@focalshipping.com). Reports can be made anonymously, and we ensure protection against retaliation for whistleblowers. All reports will be investigated thoroughly and confidentially.



**Capt. Parag Jain**

**CEO**

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