



Focal Compliance Policy

Introduction

Focal is committed to upholding the highest standards of corporate integrity and accountability. Compliance is the cornerstone of our operations, ensuring we conduct business ethically, transparently and in adherence to international, regional and local laws and regulations. This policy provides guidance to all employees, contractors and business partners on maintaining compliance in every aspect of our operations.

Purpose and Scope

The purpose of this Compliance Policy is to establish clear guidelines to:

- Ensure adherence to applicable laws, industry regulations and ethical standards.
- Promote a culture of integrity and transparency across all Focal operations.
- Safeguard against compliance risks, including bribery, corruption and environmental violations.
- Protect Focal's reputation and the trust of our clients, partners and stakeholders.
- This policy applies to all employees, contractors, agents and business partners globally.

Statement

Focal conducts its global operations with integrity, prioritising safety, compliance and ethical business practices. Adhering to international, regional and local compliance requirements is crucial for both our business and yours. We are committed to:

- Maintaining compliance with all relevant laws and regulations
- Avoiding conflicts of interest and unethical practices
- Ensuring accountability and transparency in all operations
- Protecting the health, safety and well-being of all stakeholders

Key Compliance Areas

1. Anti-Bribery and Corruption

Focal has zero tolerance for bribery and corruption. Employees, contractors, and agents are prohibited from offering, receiving or soliciting bribes or improper payments. Our operations align with the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable anti-corruption laws.



2. Sanctions and Export Controls

Focal ensures compliance with global sanctions, embargoes and export controls. Transactions involving prohibited countries, entities or individuals are strictly avoided. Employees must verify all parties against applicable sanction lists.

3. Health, Safety, and Environmental Compliance (HSE)

We prioritize the health and safety of our employees, partners and communities while striving to minimize environmental impact. Compliance with HSE protocols, including safe cargo handling, waste management and emissions reduction, is mandatory.

4. Data Protection and Confidentiality

Focal safeguards personal, business and operational data in line with data protection laws, including GDPR. Confidential information must be handled securely and responsibly.

Governance and Oversight

1. Employees and Representatives: Must comply with this policy and report violations.
2. Management: Responsible for fostering a culture of compliance, ensuring employees understand their obligations, and addressing compliance risks.

Reporting and Whistleblowing

Focal encourages the reporting of suspected violations of this policy through management@focalshipping.com. Reports can be made anonymously, and we ensure protection against retaliation for whistleblowers. All reports will be investigated promptly and thoroughly.

Capt. Parag Jain

CEO

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