



Anti-Bribery, Corruption & Export Control Procedure

	<u>Name</u>	<u>Org. Unit</u>
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1. Introduction

This procedure sets out both the responsibilities in preventing bribery and corruption (including export control) and how LV Shipping will implement adequate control to do so, thus demonstrating compliance with UK and International Legislation. Consequently this procedure applies to all employees, contractors, directors in LV Shipping and companies under its control.

2. Scope:

2.1 Anti-bribery and Corruption:

The UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 create offences and penalties for bribery and corruption. The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires LV Shipping to implement adequate controls in the prevention of bribery.

Under the UK Bribery Act 2010 LV Shipping is required to implement procedures in order to prevent bribery by any individual or organisation that performs services for or on behalf of LV Shipping.

3. Reference Documents:

- » Policy Statements (including anti-bribery and corruption) DC-0403;
- » Register of Other and Legal Requirements DC-O304;
- » Control of Documents and Records Procedure LV/DC/0411;
- » Internal Audit Procedure DC-0407.

4. Definitions:

Broadly, bribery is the offer, promise, giving, demanding or acceptance of a financial or other advantage as an inducement or reward for an action which is illegal, unethical or a breach of trust. For example, a bribe could be a promise of anything of value, the offer or receipt of any kickback, loan, fee, reward or other advantage or even the giving of donations or charitable aid, in any case where it is designed to exert improper influence (e.g. in the award of a contract).

Corruption, broadly, 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.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. For the purposes of this procedure, whether the payee or recipient of the act of bribery or corruption works in the public or private sector is irrelevant.



Bribery and corruption behavior can be committed by:

- » An employee, manager or director;
- » Any person acting on behalf of LV Shipping (our business partners or agents);
- » Individuals and/or organisations where they authorise someone else to carry out these acts.

5. Responsibilities:

5.1 Senior Management:

The Managing Director is the Board Director with primary accountability for LV Shipping's anti-bribery and corruption efforts, as set out in the Anti-bribery and Corruption Policy, DC-0403.

5.2 HR/Risk Director:

The HR Director has the primary responsibility for the implementation of this anti-bribery and corruption procedure and for ensuring that it is adhered to by all LV Shipping business units.

5.3 Company Secretary (Head of Accounting):

The Company Secretary, shall through the internal audit accounting process monitor and report the results of adherence at least monthly to the LV Board of Directors.

5.4 Departmental Manager:

Departmental Managers are accountable for ensuring the implementation of this procedure within their area of operation and/or region.

5.5 Customs Manager:

Customs managers are responsible for ensuring the implementation of this procedure in relation to export controls within their area of operation and/or region.

5.6 All Employees:

All employees must report actual, potential or suspected corruption in LV Shipping or by any individual or organisation with whom LV Shipping does business. You must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an intention or plan to violate this procedure and policy.



6. Steps to Prevent Bribery and Corruption:

- » Effective risk assessment lies at the very core of the success or failure of this procedure. Risk identification pinpoints the specific areas in which we face bribery and corruption risks and allows us to better evaluate and mitigate these risks and thereby protect ourselves. Risk assessment is intended to be an on-going process with continuous communication between local management and the Company Secretary (Head of Accounting).
- » Many serious global bribery and corruption offences have been found to involve some degree of inaccurate record keeping. We must ensure that we maintain accurate books, records and financial reporting within all LV Shipping business units and for significant business partners working on our behalf. Our books, records and overall financial reporting must also be transparent i.e. they must accurately reflect each of the underlying transactions. False, misleading or inaccurate records of any kind could potentially damage the Company.
- » Our businesses must all maintain an effective system of internal control and monitoring of our transactions. Once bribery and corruption risks have been identified and highlighted via the risk assessment process (DC-0520), procedures can be developed in order to help mitigate these risks on an on-going basis.

7. Where do Corruption Risks Typically Arise:

The following section outlines the general requirements and processes to help identify the vulnerabilities and eliminate the potential for anti-corruption and bribery risk. In order to achieve this LV Shipping has identified the following risk areas:

- » Gifts, entertainment and hospitality (including government officials);
- » Third Parties;
- » Business development transactions;
- » Donations and contributions;
- » Facilitating payment;
- » Financial books, records and internal controls;
- » Employment procedures;
- » Multi-lateral export control.

Each business unit manager must ensure that the business for which he/she is responsible implements the necessary steps to prevent bribery and corruption.



8. Gifts, Entertainment and Hospitality:

Gifts, entertainment and hospitality includes the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

Circumstances that are usually acceptable include:

- » Modest/occasional meals with someone with whom we do business;
- » Occasional attendance at ordinary sports, theatre and other cultural events;
- » Gifts of nominal value, such as pens, or small promotional items.

As a rule, LV Shipping employees and business partners should not provide gifts to or receive them from any government official (or their close families and business associates). However, we do understand that in certain countries gift giving and receiving with these individuals is a cultural norm. On an exceptional basis, however, items of minimal/modest value may be provided to government officials where it is legal, would be considered respectful of local customs and provided it is done in a fully transparent way.

If you feel uncertain at any time regarding cultural acceptability of gifts, entertainment or hospitality, please consult the Company Secretary. In addition, if an example does not fall under the below categories, please in the first instance seek guidance from the Company Secretary. Generally, such examples would not be permissible without prior approval.

8.1 How to Ensure Compliance:

In order to evaluate what is "appropriate" it is worth asking yourself the following:

- » Intent, is the intent only to build a business relationship or offer normal courtesy, or is it to influence the recipient's objectivity in making a business decision?
- » Materiality and frequency, is the gift modest and infrequent or could it place you or the recipient under an obligation?
- » Legality, are you sure the gift is legal in your country and in the country of the recipient?
- » Compliance with rules, does the recipient's employer allow them to accept the gift?



- » Transparency, would you be embarrassed if your manager, colleagues, or anyone outside LV Shipping became aware of your actions? If so, there is probably something wrong.
- » Hypocrisy, are there double standards? We should only offer what we would be comfortable accepting, and vice versa.

If you find it difficult to answer one of these questions, there may be a risk involved which could potentially damage our reputation and business and the action could well be unlawful.

Although no two situations are the same circumstances which are never permissible include examples that involve:

- » Any gift that would be illegal, e.g. any gift offered to a government official in breach of local or international bribery laws;
- » Gifts to or from parties engaged in a tender or competitive bidding process;
- » Any gift of cash or cash equivalents;
- » Any gift that is intended as a quid pro quo, i.e. offered for something in return;
- » Any gift that appears excessive, e.g. because it might adversely affect LV Shipping's reputation
- » Any gift that is paid for personally in order to avoid having to report or seek approval.

9. Third Parties:

LV Shipping may be held liable for bribery or any other corrupt acts by third parties contracted by LV Shipping or in other situations where LV Shipping may benefit from bribery or corrupt acts by third parties. Third parties also include business development transactions i.e. mergers and acquisitions, licencing arrangements, joint ventures and deals where responsibility is contracted out to a third party.

In regard to the above it is important in knowing exactly who LV Shipping is dealing with. This is normally referred to as due diligence. Ensuring due diligence can help to protect our organisation from taking on people who might be less than trustworthy.



9.1 How to Ensure Compliance:

Since due diligence is be risk based, the sources of information about the third party will vary according to the level of risk and due diligence. The following are examples of some of the general risk to be aware of and will require checks before engagement and/or representation of LV Shipping in business dealings.

- » Country risk, high levels of corruption an absence of effectively implemented anti-bribery legislation;
- » Family, business or other "special" ties with government or political officials;
- » Reputation for violation of local law or company policy, such as prohibitions on commissions, or currency or tax law violations. Also negative press, rumours, allegations, investigations or sanctions;
- » Requests from government officials or agencies to engage or hire specific third parties;
- » Inadequate credentials for the nature of the engagement or lack of an office or an established place of business;
- » Missing or inadequate documentation to support services and invoices;
- » Unsupported charges or expenses, requests for payment of non-contracted amounts;
- » Convoluted or complex payment requests, such as payment to a third party or to accounts in other countries, requests for payments in cash or requests for upfront payment for expenses or other fees;
- » Requests for political, charitable contributions or other favours as a way of influencing official action;
- » Third party has a reputation for getting "things done", regardless of circumstances or suggests that for a certain amount of money, he can fix the problem or "make it go away".

As part of our due diligence process LV Shipping have in place a vendor/sub-contractor assessment procedure, DC-0413 (appendix A). This process requires the vendor/sub-contractor to supply details outlined in our form DC-04002 (Appendix B).

If you are unsure of the parameters around third party bribery and corruption, please contact the HR/Risk Director and/or Company Secretary.

10. Charitable Contributions:

As an organisation LV Shipping is committed to charitable donations in which it usually selects a different local charity each year.

It does not make contributions to the following:

- » Charitable contributions made to any organisation having any affiliation with a government official, customer or customer representative;
- » Charitable contributions made on behalf of a government official, customer or customer representative.

10.1 How to Ensure Compliance:

All donations made in accordance with this procedure require the authorisation and approval of the Board of Directors.

11. Facilitating Payments:

A facilitating payment is defined as a payment to an individual to secure or expedite the performance of a routine government action by government officials to whom one is already entitled. These are generally small payments to low ranking government officials, for example, in order to:

- » Obtain permits, licenses or work orders to which you are already entitled;
 - » Receive police protection, mail pickup or delivery;
- » Receive phone service, power and water supply, loading and unloading cargo, protecting perishable products;
- » Schedule inspections or transit of goods across country border controls.

LV Shipping regards all facilitating payments as a corrupt practice and therefore expressly forbid them.

12. Financial Books, Records and Internal Control:

Every LV Shipping employee has an obligation to truthfully report all transactions and ensure no payments are made based on false documentation. Compliance is monitored by LV Shipping finance department. LV Shipping employees having custody of accountancy records shall be responsible for their security and ensure that no improper or unauthorised alterations or disclosures occur.



The Company Secretary shall through the internal and external audit accounting process monitor and report the results of adherence at least annually to the LV Board of Directors.

There are certain criteria that may indicate possible concealment of the true nature of the transactions, including:

- » Unusual pay arrangements (e.g. requests for payments in cash or to out of country bank accounts, or upfront payment for services);
- » Invoices or requests for payment that are unusual or outside the normal vendor authorisation, approval or payments process;
- » Invoicing with a lack of supporting documentation. Vague or false description of services provided such as “Consultancy services” or “For services rendered”. No supporting written agreement with clear detail of the services being provided;
- » Excessive payments for the services described on the invoices;
- » Incomplete or unclear journal entries in the accounting system.

The following acts are prohibited by LV Shipping:

- » Authorising or funding any transaction that is undisclosed or unrecorded in the companys books, records and accounts;
- » Approving, inducing or making any payment with the intention, purpose or understanding that such payment or any part thereof is to be used for any purpose other than that described by the documents supporting the payment;
- » Omitting, falsifying or disguising entries, or otherwise creating misleading or incomplete entries in any of LV Shippings books and records; approving or inducing such acts or entries in any books, records or accounts of any third parties with whom the company conducts business;
- » Paying expenses that are improper, unauthorised and/or unsupported by proper documentation.

13. Employment Procedures:

Pre-employment screening provides a common methodology throughout LV Shipping of all LV Shipping new hires and the pre-engagement screening of all workers. Pre-employment screenings help protect LV Shipping staff and assets etc., by ensuring that individuals hired have the claimed qualifications and

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experience required for their positions. It also helps ensure that no hidden information is found which would preclude the staffs employment.

There are certain criteria that may indicate that the individual may not be appropriate for employment, including:

- » Refusal to sign a confidentiality agreement;
- » Unfavourable background checks results.

LV Shipping also engages the services of the UKBA in ensuring (where applicable) compliance is met in regards to visas and immigration for work within the UK.

13.1 How to Ensure Compliance:

All hiring managers must ensure that results from candidate pre-employment or pre-engagement screening processes meet LV Shipping standards before an appointment is made. As such, all offers of employment should include a conditional statement that satisfactory completion of the pre-employment screening is a condition of employment. Records of the above must be located within LV Shippings on-line HR systems "Alcumus".

14. Multi-lateral Export Control:

Exporting involves a complex number of suppliers, shippers, packers, carriers and freight forwarders etc. each wanting to move their goods speedily. But there are a number of requirements that conflict with moving goods speedily, those of which are outlined below:

- » Exporters are legally responsible for determining if the goods are licensable and for obtaining such licences as appropriate and for advising the freight forwarder accordingly;
- » Government has to balance conflicting demands and is committed to an ethical foreign policy;
- » HMRC and UKBA need to balance trade facilitation and regulatory duties
- » These interests collide during the export process;
- » Preventing the proliferation of Weapons of Mass Destruction (WMD);
- » Collective security of the UK, its forces sand it allies;
- » To maintain regional and international security;



- » Human rights (human trafficking);
- » Reinforcing respect for international law.

It is the legal responsibility for the exporter to complete their export customs formalities, with accurate information and providing clear instructions (in writing) to the freight forwarder.

The role of the freight forwarder in the export control process is an advisory and educational one, relative to informing the exporter of their responsibilities and where to seek guidance. It is also responsible for undertaking relative checks to see if exporters have taken the appropriate measures to see if the goods require a license.

14.1 How to Ensure Compliance:

LV Shipping is a member of the British International Freight Association (BIFA) and as such operates in line with BIFA Standard Terms and Conditions (STCs). Allied to sensible practices the STCs are the corner stone, along with training of staff in ensuring compliance with our legal obligations.

Our Freight forwarding activities in the US are governed by the US Federal Maritime Commission (FMC), in which LV Shippings Houston office holds the appropriate FMC licence in our freight forwarding operations.

In order to evaluate what is "appropriate" LV Shipping require a copy of all necessary information (in writing) from the exporter. This must include the following:

- » Correct name , address and VAT number;
- » The detail of the goods;
- » Community Code / Tariff Code / Harmonised System (HS) Code;
- » Value and currency;
- » Export licence reference number, or if not applicable, LIC99 (NLR);
- » EORI;
- » Consignee name and address;
- » Origin of the goods;
- » File reference;
- » Weight (mass) of consignment;
- » Country of final destination.

Upon receipt of the above information LV Shipping will act responsibly and undertake checks (including as to whether it requires a license in their own name), ask reasonable questions and keep and maintain records to this effect. Such checks shall include but not limited to the following:



- » Control Lists;
- » Are the goods subject to licence;
- » Correct use of LIC 99;
- » Commodity codes;
- » Sanctions and embargoes;
- » Impact to STCs.

Where information provided by the exporter is found to be incorrect i.e. the commodity code is flagged as subject to export restrictions and will require a licence number, LV Shipping will advise the exporter as to the deficiency and where to seek appropriate guidance.

All export information including follow-up correspondence will be recorded and held on LV Shippings Customs Data Freight System.

15. How to Report Concerns of Miss Conduct:

Alertness and an understanding of what is not permissible is the responsibility of everyone, particularly those of us who work directly with third parties and/or customers who are in a position to influence commercial decisions.

You must report any genuine concern regarding misconduct and please be reassured that anything you say will be treated in confidence. You can report any concerns of misconduct to:

- » Line management;
- » HR/Risk Director
- » Company Secretary.



Activity	Process	Responsibility
<p>CATEGORY 1 All sub contractors used for Safety critical work or training must conform to category 1</p> <p>CATEGORY 2 Able to demonstrate by audit or vendor assessment questionnaire, an acceptable HSQE system,</p> <p>CATEGORY 3 Adequate, assessed on past performance</p> <p>CATEGORY 4 Sole supplier of product or services required, or supplier of one off purchases</p> <p>CATEGORY 5 Company suppliers that don't require assessment</p> <p>CATEGORY 6 Routed Traffic</p>	<div style="text-align: center;"> <div data-bbox="485 405 1045 524" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Independently approved to BS EN ISO 9001-2008 BS OHSAS: 18001:2007 BS EN OSI 14001-2004 or have the HSG65 system. </div> <div data-bbox="746 533 762 577" style="text-align: center;">↓</div> <div data-bbox="485 584 1045 748" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Sub Contractors & Supplier: Used on a regular basis where the quality of service must be of a high standard and must have HSQE systems in place even if not accredited. </div> <div data-bbox="746 757 762 801" style="text-align: center;">↓</div> <div data-bbox="485 792 1045 965" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Sub Contractors & Suppliers Small companies that don't have a documented Used quality system. on a regular basis where the quality of service is assessed on past performance. </div> <div data-bbox="746 974 762 1019" style="text-align: center;">↓</div> <div data-bbox="485 1032 1045 1167" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Sub Contractors & Suppliers That is not used on a regular basis or offer a sole supplier service. (Not safety critical) </div> <div data-bbox="746 1176 762 1220" style="text-align: center;">↓</div> <div data-bbox="485 1227 1045 1391" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Sub Contractors & Suppliers Companies that come under category 5 are professional services/ bodies and hotels etc </div> <div data-bbox="746 1400 762 1444" style="text-align: center;">↓</div> <div data-bbox="485 1458 1045 1621" style="border: 1px solid black; padding: 5px;"> Sub Contractors & Suppliers Companies that come under category 5 are professional services/ bodies and hotels etc </div> </div>	<p>It is the responsibility of each operator to ensure the subcontractors they use are approved on the sapphire system</p> <p>The only time this does not apply is for Routed Traffic. See Category 6</p>



CATEGORY 2

Able to demonstrate by audit or vendor assessment questionnaire, an acceptable HSQE system,

- » As category 1 but don't have accreditations but have systems in place assessed by vendor and subcontractors form DC-04002. Preferred supplier would be from category 1
- » Subcontracted general warehouse companies.

CATEGORY 3

Used on a regular basis where the quality of service is assessed on past performance.

- » Standard haulage companies. (Insurance documentation must be obtained and maintained)
 - » White van man. (Insurance documentation must be obtained and maintained)
 - » Office equipment suppliers.
 - » Fuel suppliers.

CATEGORY 4

Supplier of specialist products or services that are required or supplier of a one off purchase.
(Not safety critical)

CATEGORY 5

Company suppliers that don't require assessment

- » Hotels.
- » Professional services.
- » Gas & Electric suppliers etc.

CATEGORY 6

Routed Traffic

- » LV Shipping has no responsibility for the transport of goods/cargo under the heading of Routed Traffic.



APPENDIX B

LV OFFICE USE ONLY

Approval Route (tick appropriate box)	Date of Approval:-		
Accredited to ISO & OHSAS standards			
Has the Compliance Acknowledgement certification been signed on page 6 by the third party Vendor or Sub Contractor?			
Audited and/or Vendor Questionnaire			
Does the company meet the requirements			
Category			
Is an audit required			
Temporarily Approved	Subject to comments		
Approved by			
Signature			
Position			

Vendors and Sub Contractor HSQE Questionnaire

This Questionnaire has been designed for ease of use but maintaining sufficient collective information that will remain strictly confidential.

It covers Quality, Health & Safety and Environment, and is in a format that covers all services required by LV Shipping Ltd.

On receipt of **this** questionnaire **it is in all** our interest's **to** complete and return as soon as possible as failure to do so may result in your company being removed or not being added to the list of authorised Vendors and Sub Contractors.



Company Name			
Service Product Supplied			
Registered address if different:	Trading address:		
Post Code			
Telephone No.		Fax No.	
Contact Name			
E-Mail			
Bank Name			
Bank Address			
VAT No			
Company Reg No			
Name Of Person completing this form & Job Title			
Commercial Section			



Vendor & Sub-Contractor's Quality Assessment Questionnaire

Quality Section

1.0	Quality System Information	Yes	No	N/A	Copy Supp
1.1	Date Company was established:				
1.2	Does your company hold any Quality Accreditation: If yes please supply a copy of				
1.3	Accreditation by:				
1.4	If no to question 1.2 is the company working towards accreditation.				
1.5	Has your company a documented quality policy statement and objectives: If yes please provide				
1.6	Does the company operate to formal written procedures:				
1.7	Are Management review meetings held:				
1.8	Is there an auditable, trace ability of contract records				
1.9	Are internal audits carried out on your procedures				
1.10	Do these audits cover all sections of the company i.e. Quality, Health & Safety and				



Vendor & Sub-Contractor's Safety Assessment Questionnaire

Health & Safety Section

2.0	Health & Safety System Information	Yes	No	N/A	Copy Supp
2.1	Does your company hold any Safety Accreditation: If yes please provide a copy of				
2.2	Accreditation by:				
2.3	Has your company a documented Health & Safety policy and objectives: If yes please provide a copy.				
2.4	Does the company operate to formal written procedures:				
2.5	Does the company have a no blame near miss reporting procedure				
2.6	Number of near misses and unsafe conditions reported in the last 12 month				
2.7	Does the company hold records of accident statistics If yes please provide a copy, if no please supply number of accident minor and reportable for the last				
2.8	Does the company hold Safety meetings				
2.9	Are all sections of the work force represented in Safety meetings				
2.10	Are minutes taken and filed for audit				
2.11	Does the company have a documented training program in Health & Safety				
2.12	Are records kept of all Safety training				
2.13	Does the company have a documented procedure of assessing the competency of its staff				
2.14	Does the company hold induction's for new employees				
2.15	Does the company have a file of generic Risk Assessments for duties carried out				
2.16	Are signatures obtained and recorded of Risk Assessment briefings				
2.17	Does the company hold COSHH assessments on products its employees come in to contact with.				
2.18	Does your company operate a Drugs & Alcohol system				
2.19	Does your company operate right to refuse work policy on H&S grounds				



Vendor & Sub-Contractor's Environmental Assessment Questionnaire

3.0	Environmental System Information	Yes	No	N/A	Copy Supp
3.1	Does your company hold any Environmental Accreditation: e.g. EMAS ISO 14001: If yes please				
3.2	Accreditation by:				
3.3	If no to question 3.1 is the company working towards accreditation.				
3.4	Has your company a documented Environmental policy and objectives: If yes please provide a copy				
3.5	If no is the company working towards an Environmental Management system				
3.6	Does the company operate to formal written procedures:				
3.7	Does the company operate a recycling program wherever possible				
3.8	Does the company use recycled materials / products or environmentally friendly products				

Vendor & Sub-Contractor's Additional Questions

4.1	Insurance information please supply copies of all certificates				
4.2	Has the company got any pending or had any convictions, prosecutions, or notices served in the last 3 years by the HSE or Environmental agency. If yes				
4.3	Does your company hold an Anti bribery and Corruption policy. If yes please provide a copy				
4.4	Does your company have a trade compliance policy. If yes please provide				
4.5	If your company has any other accreditations that you feel would be of interest. If yes please provide copy.				



May LV Shipping Ltd thank you for your time taken to complete this Questionnaire. Your comments regarding this Questionnaire would be appreciated in order for LV to make amendments for ease of use to other suppliers.

Easy to fill in:	Yes	No
Questions easy to follow:	Yes	No
Are there to many questions:	Yes	No

Any Comments:

Please return this form to:

Email:

Tel:



Third Party Compliance Acknowledgement and Certification

The undersigned acknowledges that the undersigned:

1. Is familiar with the Foreign Corrupt Practices Act ("FCPA") and its prohibition against making an offer, payment, promise to pay, or authorization of the payment of any money, or offer, gift or promise to give, or authorisation of the giving of anything of value to any foreign official, political party official, or candidate for foreign public office for purposes of influencing any act or decision of a foreign official in his official capacity, inducing such foreign official to do or omit to do any act in violation of the lawful duty of such official, or for any other improper purpose, and has reviewed LV Shipping's policies.
2. Is familiar with the UK Bribery Act (the "Bribery Act") and its prohibition against directly or indirectly offering, promising or giving a financial or other advantage to another person intending that person to improperly perform a function or activity or knowing or believing that acceptance itself constitutes the improper performance of a function or activity.
3. Is aware of compliance trade laws, antiboycott laws and has reviewed LV Shipping's policy summaries on export controls and sanctions.

The undersigned represents, warrants, and agrees that the undersigned:

1. Has not in the past year or otherwise and will not take any action that would constitute a violation of the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act or local anti-corruption laws, including making any offers or payments to any Foreign Official to obtain or retain business on behalf or for the benefit of an LV Shipping company, or for any other improper advantage.
2. Has not in the past year or otherwise and will not sell services or export products obtained from LV Shipping in violation of export controls sanctions and antiboycott laws, including by selling /moving goods without the necessary licenses or in violation of license conditions, selling to prohibited countries end-users, or selling LV Shipping products / services for prohibited end-uses, such as the development of weapons; Has not in the past year or otherwise and will not sell or export any goods



obtained from LV Shipping or manufactured by LV Shipping to Cuba, Iran, Syria, and Sudan or to nationals or permanent residents of those countries and any other sanctioned countries.

The undersigned agrees that he/she shall promptly notify LV Shipping Ltd of any possible export violation involving LV Shipping's goods/ services or if the undersigned is under investigation for possible violation of U.K or U.S. trade, anti-corruption and antiboycott laws, including U.S. export controls, sanctions, antiboycott, the FCPA or the Bribery Act. The undersigned also agrees that it will provide this Acknowledgment and Certification now and as requested on an annual basis and at any other time if reasonably requested by LV Shipping Ltd

The undersigned further agrees that if any of the above statements should become incorrect due to a change in law, fact or both, the undersigned shall promptly notify LV Shipping Ltd.

Signature:

Name:.....

Position:.....

Company:.....

Date:.....