

In the workplaces of all OTTO MARINE Group of Companies (the Group), our Values, Principles and Code of Conduct define our culture and shape the attitudes and behaviours that we are expected to embody at work. These are instrumental as we strive to achieve the Group's vision.

The Group's Code of Professional Conduct serve to guide our conduct and decisions at work. It should:

- Influence our commitment and decisions in everyday work;
- · Improve employee morale, job satisfaction and engagement;
- Increase productivity as we work collaboratively towards the same goals;
- Stamp out 'incivility' such as excluding others, rudeness, negativity, etc.

As a guiding principle for all of us, the workplace practices outlined below constitute a professional work ethic that would speak highly of you and reveal a good character.



A COLLABORATIVE WORK RELATIONSHIP AND ENVIRONMENT

You are encouraged to:

- Help your colleagues alleviate any challenges they may be experiencing;
- Proactively share information with others so that they can do their jobs better;
- Understand and respect the views of those affected by your work. We are a diverse workforce with differing cultures, religions, genders, local norms etc. that influence how we see the world;
- Through your actions, contribute to our reputation as a socially responsible company that exercises fairness, honesty, respect, courtesy and sensitivity to others, making the Group a positive and safe place, in which to work;
- Maintain a positive mindset and attitude toward team development, taking the opportunity and time to practise teamwork skills which enhance shared-problem solving;
- Trust and be confident in each other's abilities by encouraging equal participation and brainstorming of ideas;
- Let others know how you value their contribution.



You are encouraged to:

- Be inclusive and communicate openly by sharing information and knowledge with your colleagues;
- Show respect during meetings by being physically and mentally present and be open to the ideas and points of view of others;
- Avoid a 'my way or the highway' attitude. Listen for understanding and let others finish speaking before sharing your thoughts;
- Make truthful statements, promises or commitments that you and the Group are able to meet and communicate any changes as they occur.

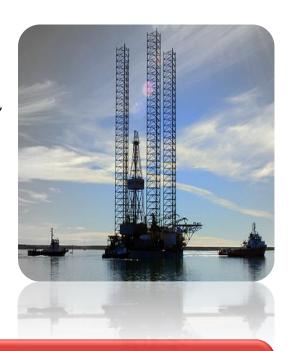
SHARED ACCOUNTABILITY

When you come to work, you represent yourself and the Group. Remember that you are the best advocate and representative of the Group. How you connect with and affect those around you matters.

In determining whether a specific behaviour is acceptable or not, consider what a "reasonable person" would judge as acceptable or unacceptable, having regard to the circumstances. Below are some examples of unacceptable workplace behaviours which are not tolerated in any OTTO MARINE GROUP of Companies:

- Displaying rude, discourteous and aggressive behaviour which shows lack of regard for others, through offensive and/or derogatory emails;
- Threatening and/or intimidating behaviours such as yelling at others, and any form of physical assault;
- Being inconsistent in your treatment of others, leading to perceptions of favouritism and preferential treatment;
- Setting goals and expectations that others would reasonably view as unrealistic;

- Withholding approval for or denial of requests maliciously, discriminatorily, unfairly or without any reasonable basis;
- Undermining the performance, reputation or professionalism of others by deliberately withholding information, resources or authorisation or supplying incorrect information;
- Expressing belittling opinions or providing unreasonable and unconstructive criticism.



It is everyone's responsibility to ensure mutual respect is maintained whenever we interact with our colleagues and clients. Differing social and cultural standards may mean that behaviour that is acceptable to some may be perceived as unacceptable or unreasonable to others. This means having high levels of self and/or situational awareness as well as personal accountability of one's actions, both physical and verbal.

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Group Chief Executive Officer OTTO MARINE LIMITED 9 June 2014

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