

ANTI-BRIBERY & CORRUPTION POLICY

This policy applies to all **XT Management Ltd.** employees ashore & at sea.

Employees should adhere to this policy while they are on duty, off duty and on vacation. The company has adopted a zero tolerance policy, any breach of this policy by employees may lead to a disciplinary action.

The company is committed to complying with all applicable anti-corruption laws including laws prohibiting bribery and money laundering, and to conducting its operations and dealings in an ethical, honest and fair manner.

It is strictly prohibited for all company Directors and Employees ashore & at sea, to pay, offer to pay or promise to pay money or anything of value, to a government official, to an existing or potential business partner or any other party, whenever such payment or offer is intended to influence latter's (or a decision of any governmental authority) act or decision, to award or retain business, or to induce or reward unethical or illegal behavior or a breach of duty. Each employee must comply with all applicable laws and regulations in all countries to which they may visit, while serving on board fleet vessels and or while doing business on behalf of the company.

Likewise, company Employees are not to request, receive, solicit, agree to receive, money or anything of value that may reasonably be regarded as a bribe or as an improper incentive for the Company's business activities.

The company, its Directors and Employees shall neither receive nor offer or make, gifts, donations or other benefits which are intended to or perceived to obtain business. However, Employees and Directors may accept and offer nominal gifts which are customarily given.

The company's reputation for its fair dealings and honesty is an invaluable component of its success. Please be sure to comply with this policy at all times.

Internal Reporting

Directors and Employees shall take all reasonable action to stop any misconduct and or violation of this policy, as soon as they become aware of it.

Directors and Employees are expected to report any known or suspected misconduct to the **DPA** (dpa@xtholdings.com).

If any employee needs any further guidance or clarification on this policy, please contact the Company QA Manager by email: qa@xtholdings.com

SIGNED: 
QA Manager

DATE: 27.05.20