

# Third Party Policy

For Dealing with External Parties,  
Suppliers and Agents



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# Overview of the Policy

Our core values are rooted in, and guide the commitment, passion and dedication of each and every team member at Swiftships to achieve, succeed, grow, and excel. We live by our core values and set the highest standard of ethical business conduct in everything we do.



# Purpose

This Policy, for working with Agents and 3rd Parties, is part of Swiftships' Business Code of Conduct and FCPA and will provide all employees and subcontractors a guideline for conducting company business.

# Scope

This Policy shall apply to Swiftships, any of its business partners and all of its subcontractors. It shall be binding for the entire staff, regardless of their job and position.

The enforcement of this Policy, in full or in part, may extend to any natural and/or legal person associated with Swiftships on any terms. Swiftships may develop a number of procedures and instructions to implement and enforce the obligations undertaken, and to bring it into line with the different local laws and regulations applicable to Swiftships. The process to identify and review business partners, suppliers and large customers engaged in relations with Swiftships, regarding corruption, fraud, international trade sanctions or similar risks hereunder described, and its implementing regulations, is independent of any other social, environmental, operational, financial commercial review or otherwise, that Swiftships may carry out with Suppliers or other Third Parties.



# Policy Statement

This Policy has been developed and is implemented based upon the following principles:

Swiftships shall identify and review all its Business Partners, Large Customers, Suppliers and Third Parties with whom it has trade relations, regarding corruption, fraud, international trade sanctions or similar risks.

Due Diligence processes shall be performed based upon reasonableness and best practices principles, and shall have different levels based upon the association of Third Parties with Swiftships, whether in terms of business volume, sector or market risk or otherwise. Swiftships will exercise risk-based due diligence before engaging into third-party contracts, including for joint venture or teaming agreements and with suppliers and international consultants.

Swiftships shall not engage in trade with any new Supplier, Business Partner, Third Party or Large Customer who has not been previously identified and reviewed pursuant to this Policy and its implementing regulations.

Swiftships shall not have any trade relations with any Third Parties whenever risks in the field of corruption, fraud, international trade sanctions or the like, have been detected within the scope of a Due Diligence review, without a remedy or mitigating them.

Upon carrying out any Due Diligence process, Swiftships will attempt not to delay the terms set in the Registration process in respect of any Business Partner, Supplier or Large Customer.



# Responsibilities

Swiftships shall employ any available means to carry out an appropriate Due Diligence process, including:

- Review of Suppliers
- Review of Customers
- External Compliance Databases

Direct information requirements to Third Parties by the buyer, and the following departments:

- Legal
- Administration
- Compliance
- Procurement

At any rate, the Due Diligence process may entail:

- A questionnaire on the potential Business Partner, Large Customer, Supplier or any other Third party's system for corruption prevention
- The identification of their main shareholders, directors and Beneficial Owner
- The investigation carried out through external Compliance Databases or otherwise, regarding the information provided by the Business Partner, the Large Customer, the Supplier or any other Third Party

Enhanced due diligence is performed on high risk third parties. In case of joint ventures, agents or offset partners, due diligence shall extend to their beneficial owners and the business rationale of the relationship or transaction.



# Related Standards, Policies and Processes

This Policy will be implemented in coordination and with the enforcement of the regulations described in section 1 above.

Swiftships undertakes to assign specific resources to ensure the effective implementation of the Policy. The company shall carry out appropriate processes for the regular identification of current and potential impacts in the field of corruption, fraud, international trade sanctions or similar risks which may occur, and if appropriate, take the relevant measures to prevent and mitigate any potential negative consequences. Likewise, Swiftships may collaborate with most relevant stakeholders upon implementing this Policy.

The Compliance Officer will be responsible for implementing and monitoring the Policy as a control system, with the required collaboration from the following departments: Senior Management, Technology, Administration, Procurement and any other departments directly associated with the Third Party. the Internal Audit department shall be responsible for overseeing the Policy.

All Swiftships departments and subsidiaries shall be responsible for the appropriate implementation of the Policy, and namely for the application of the principles set out in section 4 above from the moment they engage in relations with Third Parties.



# Policy Compliance

This Policy will be available and applicable to all employees, and to all stakeholders of the Company on the corporate website. Likewise, the Policy shall be subject to the appropriate disclosure, training and awareness-raising action, aimed at its full understanding and enforcement.





# Definitions and Terms

**Registration:** process whereby a business partner, a supplier or any other third party becomes a part of Swiftships' internal systems.

**Compliance Databases:** third parties' external tools aimed at managing international databases for the purposes of detecting alerts and negative information (including, without limitation, convictions for corruption, fraud, lists of international trade sanctions or the like).

**Due Diligence:** process to identify and review business partners, suppliers and other third parties with whom Swiftships has relations, in the field of corruption, fraud, international trade sanctions or similar risks.

**Large Customer:** customers not deemed to be end users with which Swiftships has a direct sales relationship.

**Action Plan:** set of measures that must be implemented, or requirements that must be executed to address or mitigate a risk detected in the Due Diligence process.

**Supplier:** third parties who sell products or supply services to Swiftships.


**Risk:** serious incidents detected throughout the Due Diligence process that must be addressed and that entail the impracticability of engaging in trade relations with a third party.


**Business Partner:** suppliers or other third parties with whom Swiftships has a particularly relevant connection and whose risks in the field of corruption are particularly sensitive for Swiftships.


**Third Party:** any person, whether natural or legal, with whom any Group company has trade relations, except for end-user customers.

**Beneficial Owner:** natural person or persons who ultimately own or control, whether directly or indirectly, any legal person.



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