

SEAWAYS SHIPPING AND LOGISTICS LIMITED

(CIN: U63010TG1989PLC010716)

Regd. office: “Seaways Pride”, Plot No: 731, Road No 36, Jubilee Hills,
Hyderabad- 500 034,

Tel: +91 40 66447000, Fax: +91 40 66102040,

Website: www.seawaysindia.com

ANTI- BRIBERY POLICY

Policy statement

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and in implementing and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption.

Coverage of the policy

This policy applies to all employees including the directors working at all levels and grades (whether permanent, fixed-term, executive, non-executive, or temporary), consultants, trainees, and agency staff or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy).

The Company could be liable for the acts of people that act on our behalf. This includes agents, distributors, suppliers and joint venture partners (together referred to as “third parties”). As such we are committed to promoting compliance with effective anti-bribery and corruption policies by all third parties acting on our behalf. All third parties should be made aware of the terms of the policy and of their obligations to comply with it. All arrangements with third parties should be subject to clear contractual terms including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

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Facilitation payments and kickbacks

The company does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a government action by a government official.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality under the following circumstances:

- it complies with local laws;
- it is appropriate in the circumstances. For example small gifts to be given at festival time or similar occasions;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly.

Donations

The company only makes donations that are legal and ethical under local laws and practices.

The policy shall be effective immediately from the date of approval by the Board and continue to be in force until and unless amended, if any.