



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY (SHIPPING & VESSELS)

This policy applies to all full-time employees, contractors, and consultants of BW LPG Ltd and its subsidiaries, as well as, where applicable, the joint ventures and associated companies of BW LPG Ltd and its subsidiaries (collectively referred to as the “Company”). This policy guides our interactions with suppliers, customers, members of the industry and other stakeholders at all levels within the organization.

The Company is committed to support and promote a business environment free of corruption and bribery, and to comply with all applicable laws relating to anti-bribery and anti-corruption in the jurisdictions in which we operate in and in particular with respect to the UK Bribery Act 2010 (the “Act”) of the United Kingdom and the Foreign Corrupt Practices Act 1977 (as amended) of the United States.

This further supports employees in their daily course of business, which provides practical tips and advice to all staff who might find themselves in a scenario where authority representatives, such as terminal workers and other affiliated persons, demand facilitation payments, including monetary and non-financial requests, or other bribery.

These guidelines are divided into three parts:

- I. Practical Standard and Guidelines
- II. Definitions
- III. Support and Reporting

I. Practical Standards and Guidelines

The Company complies with all applicable laws relating to anti-bribery and corruption in the jurisdictions in which we operate. With respect to the UK Bribery Act 2010. There are four offences outlined in the Act and they have international reach:

- Offering, promising and/or giving a bribe
- Requesting, agreeing and/or receiving a bribe
- Bribing a Public Official
- Failure of commercial organizations to prevent bribery

These offences can be committed anywhere in the world – not just the UK.

All staff are required to review and ensure practices are in accordance with the latest version of the policy at all times.

II. Definitions

Public Officials

'Public officials' include:

- Port Authorities, Classification Societies (acting on behalf of flag states), Coast Guards, Pilots, and officials who hold a legislative, administrative or judicial position of any kind
- Officials from governmental, audit or investigative bodies carrying out corporate reviews, inspections or spill / accident investigations
- Anyone who exercises a public function

Corporate Hospitality

The Act does not prohibit reasonable and proportionate corporate hospitality. However, there is no minimum value for a bribe and any expenditure may be considered a bribe if given or received with the intention of influencing business decisions. A very expensive or disproportionate gift is an indication of bribery. Any gift, entertainment or hospitality that exceeds the monetary thresholds outlined in the Gift and Entertainment Policy must be recorded as set out in that policy which is in the Company's Staff Handbook. As a matter of good conduct employees should never ask for or suggest any gifts and/or entertainment of any kind or amount from suppliers or any other person.

Facilitation Payments

Should any type of facilitation payment or "kickback" occur, local custom/practice or the fact that it may be commonplace is not an excuse. However, we, and indeed those who administer the enforcement of the Act, recognize that it is not yet possible to fully eliminate all facilitation payments in the shipping sector when pressure is applied. Even so, individual responsibility must remain clear as to the intention of complying with

the Anti-Bribery and Anti-Corruption Policy (Shipping & Vessels) of the company. Any decision to the contrary should only be taken by the appointed Anti-Bribery representative.

Payment by items (not just cash) can also be categorized as “Facilitation Payment”, where there is an intention to influence a public official in the performance of his/her official function and gain an advantage in the conduct of business.

DECLARATION OF GIFTS AND ENTERTAINMENT

- All gifts and entertainment must be declared
- Applies both to ‘giving’ and ‘taking’
- To be updated by the Master and kept in Master’s custody
- The Gift and Entertainment Log is collated and reported back to office bi-annually.

IV. Support and Reporting

Never INITIATE any discussions about payments. Be assertive, polite and confident. Wherever possible, don’t give in. Attitude can go a long way in these kinds of situations, so stand your ground and display the right body language. Never lose your temper. Be polite, calm and show respect.

1. REFUSE to make the payment and PRESENT the individual with the Company’s Anti-Bribery and Anti-Corruption Policy (Shipping & Vessels).
2. If they are FORCEFUL OR INTIMIDATING and there is a risk of loss of LIBERTY, SAFETY AND WELL BEING OF MASTER AND HER CREW ON BOARD OR ASHORE, SAFETY OF VESSEL AND CARGO, then such demands for gratuities and or payments deemed inappropriate according to the policy shall be conceded to.
3. CONTACT the Company’s Anti-Bribery Representative (see contact details below).
4. The Company's Anti-Bribery Representative and fleet teams will support you in the situation with further guidance and can obtain any necessary assistance through appropriate third parties/ authorities/ consulates.
5. A Statement of Fact can be printed to acknowledge the findings that the demands are based upon, so that payment of a valid nature could be made through official channels.
6. Any cash payment including official fines needs to be reported to and PRE-APPROVED by the office.
7. The Anti-Bribery representative will liaise with Compliance and Legal to assess / vet through any payment request if circumstances permit.

8. Always best endeavor to obtain a RECEIPT in respect of any payments made.

If you are in doubt about whether any proposed corporate hospitality/gifts are permitted, or if you have questions on facilitation payments, you must contact our Anti-Bribery Representative for advice.

We have prepared an easy-to-follow Red Flags guide which is appended in this memo for your reference.

It is important that all employees understand and comply with the Company's Anti-Bribery and Corruption Policy (Shipping & Vessels).

If you have any questions or require further information or guidance, please contact one of the Company's Anti-Bribery Representatives:

Primary Anti-Bribery Representative	Email Address	Handphone
Prodyut Banerjee	prodyut.banerjee@bwlpg.com	+65 9011 4717
Anne Chevalier	anne.chevalier@bwlpg.com	+65 9674 4095

If you encounter any person or become aware of an occurrence that relates to the Red Flags appended below, please report as soon as practicable, directly to the Primary Anti-Bribery Representative. Ship's Masters must inform the vessel operator in every case. The ship operator is also directed to inform the Primary Anti-Bribery Representative accordingly.

All staff should speak up where they have concerns on breaches of ethics in the Company, with the reassurance of protection from reprisals or victimization from reporting such concerns. Our whistleblowing platform for employees is hosted by an independent provider which supports easy reporting of concerns through an anonymous web reporting portal.

<https://secure.ethicspoint.eu/domain/media/en/gui/105447/index.html>

Bribery Red Flags

If you encounter any of these red flags whilst working for or representing BW LPG, you must report them promptly to a BW LPG Anti-Bribery Representative.

- ▶ You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- ▶ You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- ▶ A third party insists on receiving a commission or fee before committing to sign up to a contract with us or carrying out a government function or process for us that appears large given the services being provided or in unusual circumstances.
- ▶ A third party insists on payment in cash and/or refuses to sign a formal commission or fee agreement and/or refuses to provide an invoice or receipt for a payment made.
- ▶ A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business, without providing a reasonable explanation.
- ▶ A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- ▶ You are offered an unusually generous gift or offered lavish hospitality by a third party.
- ▶ A third-party request that a payment is made to "overlook" potential legal violations.
- ▶ A third-party request that you provide employment or some other advantage to a friend or relative.
- ▶ You receive an invoice from a third party that appears to be non-standard.
- ▶ A third party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to us.
- ▶ A third party insists on the use of side letters or refuses to put terms agreed in writing.

WARNING: Conviction of a bribery offence is likely to result in a significant fine to BW LPG and damage to our reputation. In addition, if you are convicted of a bribery offence, you could face imprisonment.

Document version control

Document Title	Anti-Bribery and Anti-Corruption Policy (Shipping & Vessels)
Document Owner	Head of Operations
Version Control Manager/ Supported by	HR Manager
Version	2.1
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Control Log (Summary)

Version	Date Changed	Supported by	Change Description	Approver	Approval Date
1	Jan 2019	HR Manager, Ching Ching	-	Head of HR, Shirley	Jan 2019
2	31 Dec 2024	HR Manager, Jiaxin	The Anti-Bribery and Anti-Corruption Policy (Shipping & Vessels) was part of the Global Policy and is now a standalone guideline.	Head of Operations, Prodyut	31 Dec 2024
2.1	09 Apr 2025	HR Manager, Jiaxin	<ul style="list-style-type: none">Whistleblowing hotline removed; reports can be submitted via the web portal only.Updated contact details for Anti-Bribery Representatives.	Head of Operations, Prodyut	14 April 2025

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