



### **Conflict of Interest and Transparency Policy**

Queensway Navigation Co. Ltd. is committed to maintaining the highest standards of integrity, transparency, and accountability in all areas of its operations. In support of this commitment, the Company requires all personnel, both shipboard and shore-based, to avoid any situation in which personal interests' conflict, or appear to conflict, with the interests of the Company.

A conflict of interest arises when personal, financial, or other interests have the potential to interfere with the objective performance of duties or decision-making on behalf of the Company. Such conflicts may compromise professional judgment, create unfair advantage, or harm the Company's reputation.

Examples of situations that may give rise to a conflict of interest include, but are not limited to:

- Engaging in business transactions with companies in which the employee or a close family member has a financial interest
- Accepting gifts, favors, payments, or other benefits that may influence or appear to influence decision-making
- Using Company information, resources, or property for personal gain
- Holding external employment or consultancy roles that conflict with Company duties
- Participating in decisions involving a family member, partner, or close associate

All personnel have a duty to promptly disclose any actual, potential, or perceived conflict of interest to the Company's Top Management. Disclosures must be made in writing and will be handled with discretion and professionalism. Top Management will assess each case and determine whether mitigation, reassignment of duties, or other actions are necessary to resolve the conflict appropriately.

No adverse action will be taken against any individual for making a conflict-of-interest disclosure in good faith. However, failure to disclose a known conflict, or engaging in activities in violation of this policy, may result in disciplinary measures.

This policy applies at all times during employment and extends to situations where the actions of the employee, even outside working hours, may reasonably affect the Company's interests or reputation.

Queensway Navigation Co. Ltd. expects all employees to uphold the principles of integrity and transparency and to conduct their duties in a manner that prioritizes the Company's interests above personal gain.

