



Anti-Bribery and Fraud Prevention Policy

Queensway Navigation Co. Ltd. is committed to conducting its business in a legal, fair, honest and transparent manner, with the highest standards of integrity and probity. The Company expects all shipboard and shore-based personnel to perform their duties and responsibilities in accordance with these principles at all times.

Queensway Navigation Co. Ltd. maintains a strict zero-tolerance approach to fraud, bribery, and any form of corrupt or unethical behavior. The Company will not tolerate fraudulent, dishonest or illegal activity under any circumstances, whether involving its own employees, partners, contractors or suppliers. Queensway Navigation Co. Ltd. is committed to thoroughly investigating all suspected cases of fraud or illegality, and where appropriate, will take disciplinary action or refer matters to the competent authorities for further investigation and potential prosecution.

Fraud, for the purposes of this policy, refers to any intentional act of deception carried out to unlawfully obtain money, property, or services, or to secure an unfair or unlawful advantage.

Fraud can involve assets of any value and may occur either through a single significant act or through a series of smaller actions over time. Examples may include, but are not limited to, the misappropriation of goods, funds or equipment.

For the purposes of this policy, fraud and bribery include, but are not limited to, the following acts:

- Theft or misappropriation of Company assets or the assets of third parties with whom the Company engages
- Submission of false claims, invoices or documentation for payment or reimbursement
- Accepting or offering a bribe, or receiving gifts or favors under circumstances that may reasonably be perceived as intended to influence a decision
- Blackmail or extortion
- Accepting or offering an inducement or kickback in any form
- Deliberate provision of substandard services in breach of contractual or legal obligations
- False accounting or the intentional creation of misleading or fictitious financial records, entries, or documentation
- Payment of excessive, unjustified prices or fees with no valid business rationale

Any gifts, hospitality, or benefits offered or received must be reasonable, proportionate, and declared to management. Such conduct shall be subject to oversight and approval by the Company's Top Management.

Responsibility for the overall deterrence, detection, management, and investigation of fraud and other improper behavior lies with the designated Director – Financial Manager, who is accountable for the effective implementation of this policy.

