



Trade Compliance Policy

LV Shipping sees Global Trade compliance as a pre-requisite in order to be engaged in international transactions.

LV Shipping Ltd aims to succeed in the competitive arena by being innovative, quality-driven, reliable and fair. This means observing both company-specific and statutory regulations. It is LV Shipping's policy to comply with all applicable export, import and trade compliance laws in all countries in which we do business.

Principles

LV Shipping Ltd respects applicable law, including international law, and requires its employees and business partners to do likewise. We will follow all applicable trade control laws and regulations of all countries in which we conduct business.

10 Steps to compliance:

1. Fair competition

LV Shipping Ltd is absolutely committed to the principle of fair competition and, in particular, to the strict observance of antitrust law.

2. Integrity in business dealings:

Corruption will not be tolerated.

3. Principle of sustainability

LV Shipping Ltd is conscious of its responsibility to protect health and the environment and ensure people's safety.

4. Upholding foreign trade laws

The provisions of all national and international foreign trade laws must be observed.

5. Proper record-keeping and transparent financial reporting

Our internal control system provides for the proper documentation of key business processes. Our established controls ensure that all transaction details relevant for accounting purposes are fully and correctly captured.

6. Protecting our intellectual property rights and respecting those of others

Confidential company information must not be disclosed to any third party or made public. Employees must treat the intellectual property rights of other entities with the same respect.



7. Co-operation with the authorities

The company endeavours to be co-operative in its dealings with all authorities and government agencies. All information communicated to the authorities must be correct and complete and be provided in an open, timely and understandable manner.

8. Anti-Boycott Laws

LV Shipping Ltd will never co-operate with any restrictive trade practice that is subject to sanction. LV Shipping Ltd will not discriminate against someone based on race, religion, sex, national origin except in cases where such information is related to valid government documents such as visas; or executing business documents such as contracts, letters of credit, warranties that contain illegal boycott requests.

9. Operating Procedures/agreements

LV Shipping will develop and maintain standard operating procedures/agreements for both internal and external parties (i.e. freight forwarders, agents, subcontractors, brokers etc) clearly demonstrating contractual obligations and responsibilities, and will maintain full import and export transaction documentation for compliance audits.

10. AEO Status

LV Shipping have achieved Authorised Economic Operator certification in relation to customs operations and international trade.

- » The company provides employees with access to all the necessary information resources and counsel to prevent violations of the law or company regulations.
- » Every supervisor must organize his or her area of responsibility so as to ensure adherence to company rules and applicable law and thus to the Trade Compliance Policy.
- » The Managing Director of LV Shipping Ltd shall retain the ultimate responsibility to ensure trade compliance. The LV Shipping Group have an appointed Internal Auditor and trade compliance officer, whose responsibilities include providing advice and training on compliance issues and investigating any alleged compliance violations.

All employees are required to immediately report any violations of the Trade Compliance Policy.

Corporate Auditing will review the effectiveness of the Trade Compliance Policy at regular intervals.

A handwritten signature in black ink, appearing to read 'C Lewin'.

C Lewin
Managing Director
Issued: 24/03/2016 This policy is reviewed annually