



Aethon Marine Services LLC

CONFLICTS OF INTEREST POLICY

Policy

The high level of clients support and respect that the company enjoys results not only from the recognition of its professional services, but also from the highest degree of integrity, objectivity, and professionalism of its employees and contractors. The purpose of this policy is to establish a standard of conduct to ensure that personnel in the company act in the best interests of the company and its clients and, in pursuing this goal, maintain standards relating to conflict of interest.

These standards are intended to enhance client confidence in the integrity of the company and its personnel. The company benefits from the expertise of individuals with a multiplicity of interests; however, these interests must not conflict with the interests of the company.

Scope

This policy applies to all employees and contractors of the company.

Conflicts of Interest

A situation where an individual, or the organization he/she represents or has an interest in, has a direct or indirect competing interest with the Company's activities. This competing interest may result in the individual being in a position to benefit from the situation or in the company not being able to achieve a result in the best interest of the company. A conflict may arise where an individual is a party to a contract with the company or has an interest in an enterprise, or is related to a person who is party to such a contract; or where an individual receives payment by the company for services rendered to the company other than reimbursement for reasonable out-of-pocket expenses. Conflict of interest also includes conduct which is not in keeping with the Fundamental Principles. In particular, the principles of neutrality and impartiality cannot be comprised.

Conflict of interest includes, but is not limited to situations

- *Where an employee or contractors affairs or financial interests are in conflict with their work duties, responsibilities and obligations, or result in a public perception that a conflict exist;*
- *Which could impair the employee or contractor's ability to act in the company's interest;*
- *Where the actions of an employee or contractor would compromise or undermine the trust that the clients and industry as a whole places in the company.*

Responsibility

The Managing Director is responsible for final decisions on any potential or actual conflicts of interest.

The Department Heads are responsible for presenting a recommendation on any potential or actual conflicts to the Managing Director. Employees are responsible for declaring any potential or actual conflict of interest.

Employees have a responsibility to review their obligations yearly. For contractors, they should review when appropriate or subject to their assignment.

Managing Director

03 January 2021

Approved: _____

Date: _____