

Ethics and Corporate Social Responsibility Policy

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The Following statements detail the Ethics and Corporate Social Responsibility (CSR) policy for Fathom Offshore Services Ltd

Fathom Offshore expects that all of its business is conducted in compliance with high ethical standards of business practise and with due regard at all times to their social and community impact. We apply these standards to all dealings with employees, customers, suppliers and other stakeholders.

This policy, which has been approved by the senior management of Fathom Offshore, is set out below. Our Ethics and CSR policy has been developed to ensure that our business is conducted in adherence with high ethical and legal principles and sets standards of professionalism and integrity of all employees and operations worldwide.

- All employees have the right to expect and the responsibility to ensure that Fathom's business is conducted with high ethical standards and legal principles
- The company commits to the fulfilment of equal opportunities
- The company commits to help develop the local community in which it operates and will on an annual basis actively engage with local charitable organisations to achieve this.
- Our policy is to always operate within the applicable laws of the countries we operate in and specifically the United Kingdom and United Arab Emirates
- We commit to never accept or seek shareholdings, however minor, in third party companies, single purpose companies or vessel owning companies that could cause a conflict of interest with the company's integrity as an independent shipbroker.
- The company will only receive commissions in line with the company's terms and conditions of business for short term duration charters (less than 30 days) and medium to long term vessel charters (more than 30 days)
- No bribes shall be given or received with the intention to solicit favourable conditions for ourselves or our clients.
- Employees are encouraged and supported to report, in confidence, any suspected wrong doing
- Our internal control procedures include the annual review of appropriate ethical and social behaviour.

Signed:

Managing Director

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