

Anti – Bribery Policy

Good business ethics are integral to who we are, what we do, and what we stand for, and underpin our reputation and credibility that has been built over the last 50+ years.

It is a policy of Lavar Shipping to conduct all of its business in a transparent, honest and ethical manner. Under no circumstances do we tolerate bribery and corruption.

We are not influenced, nor do we seek to influence others, by payments of money or anything of value, corporate hospitality or gifts.

Across all of our departments, no matter the scope of work, or the nature of our activities, as well as in our dealings with all clients, collaborators and affiliates, we are committed to acting professionally, fairly and with integrity.

Within our organisation and the business environment in which we operate, we aim to build a culture of anti-bribery and anti-corruption, while simultaneously implementing effective systems of compliance with relevant regulations and best practices.

The purpose of this Anti-Bribery and Anti-Corruption Policy is to:

- Set out our responsibilities for observing and upholding our zero-tolerance position on bribery and corruption; and
- Provide information and guidance to those working for us on how to identify, report and ultimately avoid, all instances of bribery and corruption.

We uphold all relevant anti-bribery and corruption laws, including the US Foreign Corrupt Practices Act 1977 (FCPA), Canada's Corruption of Foreign Public Officials Act (CFPOA), the United Kingdom Bribery Act 2010, and the relevant provisions of the Cyprus Penal Code.

We also seek to adopt (and adapt) best practices around the world into all aspects of our work. These include Transparency International's 'Business Principles for Countering Bribery', which has served as a guide in developing our policy.


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Reginos P. Tsanos
CEO

8/8/2017
Date