

## Anti Bribery and Corruption (ABC) Policy

Optimarin is subject to ABC laws in countries in which it operates directly or through third party intermediaries, including, but not limited to the local law of country(ies) of incorporation and Anti Bribery laws of country(-ies) of main operations. ABC laws include those adopted by other countries to implement the Organisation for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

1. Optimarin's ABC Policy applies to all employees, officers, and directors of Optimarin and all of Optimarin's affiliates worldwide, as well as any third party intermediaries/representatives such as resellers, contractors or agents.
2. Optimarin prohibits bribery in any form, direct or indirect. A bribe is not defined by a specific amount of money or gifts changing hands. A bribe may include any offering, giving, or receiving, of payments, lavish or excessive entertaining, favours, gifts, other inducements, or anything else of value in order to gain an unfair business advantage.
3. No Optimarin director, officer, employee, agent, intermediary, or other representative worldwide may, directly or indirectly, offer, promise, pay, give, or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for Optimarin or its members, or improperly reward the recipient for past conduct. Optimarin personnel and representatives who interact with Government Officials must ensure that any benefit conveyed to a Government Official complies with all applicable laws and regulations, with the internal rules of the recipient's organization, and with the policies and procedures in this Policy. Note that employees/consultants of state, or partially state owned, companies, including national shipping companies, are considered Government Officials.
4. All contracts with agents must include a clause that accepts Optimarin's ABC Policy and allows for termination if Optimarin's ABC Policy is breached. If a third party is not sure whether an activity would violate Optimarin's ABC Policy, the third party should contact the senior Optimarin employee with whom it works before engaging in the activity.
5. Optimarin and its employees and intermediaries/ representatives can be held liable both civilly and criminally for bribery and other corrupt conduct. Violations of anti-corruption laws can give rise to substantial fines and/or imprisonment.
6. Travel and accommodation cannot be provided to third parties in order to improperly affect or influence the outcome of a business transaction or regulatory decision. Travel expenses for a customer, Government Official, or any other third party may only be paid if the trip has a clear and legitimate business purpose, costs are reasonable, transparency exists between the persons who are traveling and their employer, and any non-business activities (such as sightseeing) are nominal and occupy no more than 20% of the total program time up to a maximum of 5 hours.

7. Gifts, hospitality, and entertainment are limited to reasonable and bona fide expenses that have a legitimate business purpose. They cannot under any circumstances be provided in order to improperly affect or influence the outcome of a business transaction.
8. A "facilitating" payment is a small payment that is designed to secure or expedite a routine government action by a government official. Examples include processing a visa, providing police protection, or securing mail pick-up or delivery. Facilitating payments are prohibited, even if considered legal or customary in the country where business is done. However, if you believe that the safety or health of you or another individual are in jeopardy then a payment to protect safety or health would not be considered a breach of this policy. The Optimarin's CEO, CFO or HSE Q/HR Manager must be notified promptly if this situation occurs, and payments must be accurately documented as such on expenses or bookkeeping records.
9. Employees and third parties are required to report directly to Optimarin's CEO and CFO any unethical or illegal activity that they witness or are made aware of. All allegations will be investigated. If employees and third parties prefer to remain anonymous they may, but it is important that all information regarding the actual events and details of the incidents are provided so that a thorough investigation may be completed.
10. No retaliation against individuals who come forward in good faith with allegations or information of wrongdoing will be tolerated by Optimarin's Management or Board of Directors.
11. All payments made in connection with the business activities of Optimarin must be accurately recorded in the books of the paying organization, and accurate records regarding the payment must be maintained.
12. All employees, contractors, resellers, agents and any other third party intermediary/representative are required to familiarize themselves with this ABC policy
13. Given employees and third parties' access to Confidential Information, they are reminded of the consequences of misuse of that information including possible severe penalties for Insider Trading.

Sandnes, 1<sup>st</sup> November 2016



Tore Andersen  
CEO, Optimarin AS