



### **1. Objectives**

Pacific Basin is committed to its Vision, Mission and Business Principles as well as high standards of corporate governance. This includes, among other things, a commitment to provide a workplace free of dishonest, illegal or discriminatory activities.

In line with these commitments, the Group has set out detailed procedures enabling employees to raise their concerns about any suspected misconduct or malpractice within the Group in confidence and without fear of reprisal or victimisation. In addition, stakeholders including but not limited to customers, suppliers and any other third parties involved in business relations with the Group are encouraged to report any concerns they may harbour about dishonest or illegal activity involving the Group.

### **2. Reporting Matters**

Reporting matters include, but are not confined to:

- a) Misconduct;
- b) Unethical behaviour;
- c) Malpractices;
- d) Illegal acts;
- e) Harassment;
- f) Victimisation;
- g) Failure to comply with regulatory requirements; and

Whistleblowers are encouraged to raise serious and genuine concerns in relation to the matters listed above in confidence and in good faith without fear of reprisal.

### **3. Reporting Channels**

All whistleblowers can raise their concerns without fear of victimisation, discrimination, or disadvantage to the Chairman of the Audit Committee, who is an independent non-executive director of the Company.

<b>Name:</b>	Patrick Paul
<b>Email:</b>	<a href="mailto:whistleblowing@pacificbasin.com">whistleblowing@pacificbasin.com</a>
<b>Telephone:</b>	+852 2233 7296
<b>Address:</b>	31/F One Island South 2 Heung Yip Road Wong Chuk Hang Hong Kong <i>(please mark strictly confidential)</i>
<b>Attention:</b>	Chairman of the Audit Committee (PB)



If you wish to report, please use the form provided on the last page. It may be submitted by electronic mail, telephone or by mail as set out above. Whistleblowers are required to disclose their full names. If the report is to be sent by mail, please enclose the form in a sealed envelope clearly marked "Strictly Private and Confidential – To be Opened by Addressee Only".

#### **4. Actions**

- a) All reports will be treated with great care and the strictest confidence.
- b) All reports, except for item (c) below, will be investigated promptly by the person receiving them. If required, the recipient can obtain assistance from other resources within the Group. The progress and results of the investigation will be reported to the Audit Committee as soon as possible.
- c) Anonymous report will usually not be considered.
- d) The format and the length of an investigation will vary depending upon the nature and particular circumstances of each report made. The matters raised may be:
  - i. investigated internally;
  - ii. referred to the relevant public or regulatory bodies;
  - iii. referred to the External Auditor; and/or
  - iv. the subject of an independent inquiry.
- e) The Chairman of the Audit Committee will write to the whistleblower as soon as practicable after receipt of the communication, acknowledging that the report has been received and stating whether an investigation is considered appropriate.
- f) Upon the completion of the investigation, an appropriate course of action will be recommended to the Audit Committee for its deliberation. Decisions taken by the Audit Committee will be implemented immediately.
- g) The Chairman of the Audit Committee will write to the whistleblower detailing the action(s) taken.

#### **5. Confidentiality**

All concerns will be treated with great care and the strictest confidence, although in some cases the Company may be legally required to disclose the information.



**PACIFIC BASIN SHIPPING LIMITED (the "Company" or "Group")**  
**EXTERNAL WHISTLEBLOWING POLICY AND PROCEDURES**

**Pacific Basin** Version: 4 May 2017

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**EXTERNAL WHISTLEBLOWER REPORT**  
**(CONFIDENTIAL)**

Please confirm you have read the Whistleblowing policy and procedures by ticking the box.

If you wish to make a report, please use this form. All fields must be filled in. You may submit the report by electronic mail, telephone or by mail as set out in Section 3.

Full name of Whistleblower: \_\_\_\_\_ Date: \_\_\_\_\_

Company: \_\_\_\_\_ Email: \_\_\_\_\_

Telephone number: \_\_\_\_\_

**The names of those involved** (if known): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**Details of concerns:**

Please provide full details of your concerns: names, dates and places and the reasons for the concerns (continue on a separate sheet if necessary) together with any supporting evidence / documents.

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