

CODE OF CORPORATE CONDUCT

PAO Sovcomflot

The present Code of Corporate Conduct has been approved by PAO Sovcomflot's Executive Board on 29th of August, 2019 (Protocol # 30 (975)) and is deemed effective from the date of its approval by the Board respectively

Contents

1. Sovcomflot Group Principles
2. Protection of Reputation
3. Health Safety Security Environment (HSSE) Excellence
4. Working Conditions
5. Confidentiality
6. Ethical Behavior
7. Press and Social Media
8. Conflicts of Interests
9. Documentation Retention
10. Modern Slavery and Human Trafficking Statement
11. Open Reporting
12. Commitment to Code of Corporate Conduct

1. Sovcomflot Group Principles

This Code of Conduct is adopted by the Executive Board of PAO Sovcomflot and applies to every employee in every company of Sovcomflot Group, being an essential element of all employment relationships. All employees across all countries where the Sovcomflot group of companies (hereinafter referred to as “Sovcomflot”, “Sovcomflot Group”, “SCF” or the “Company”) operates should familiarize themselves with this Code and commit to comply with it and with all other policies applicable to SCF staff members. The goal of this Code is to enable employees to act responsibly and accountably in their daily work and to exercise diligence in their judgment and decision making.

This Code of Conduct comprises a set of principles and core values which support ethical behaviour and decision making across Sovcomflot Group. All SCF employees worldwide must adhere to this Code and engage with any third parties who work on behalf of Sovcomflot to ensure that they also act in accordance with this Code in order to maintain SCF’s reputation as a leader of the global shipping industry.

Each SCF employee has an obligation to act responsibly and in accordance with all applicable laws and regulations and to do everything reasonably possible in all their business dealings and in the provision of services to customers to create the best outcomes for SCF Group, while at the same time prudently managing risks.

Sovcomflot Group works with world-class charterers, leading oil and gas companies and traders who care strongly about their own reputation. In order to meet customers’ expectations SCF strives to adhere to the highest standards of ethical and professional behavior while always engaging only in lawful activity. It is the responsibility of each employee to ensure that all actions and decisions are always taken in accordance with those standards and with a view to creating economic value and long-term profitability for SCF Group and all its stakeholders and to enhance SCF’s reputation and integrity.

2. Protection of Reputation

Sovcomflot is an industry leader and its reputation is one of its most valuable assets. Every SCF employee is responsible for protecting SCF’s reputation through their actions and decisions.

Sovcomflot’s core values - Safety (“Safety Comes First”), Honesty, Respect and Motivation – are established in order to protect Company’s reputation and serve as a foundation for this Code of Conduct.

Safety - Safety Comes First

SCF places great emphasis on a systematic approach to health, safety, security, quality, energy and environmental management in order to achieve continuous improvement in performance. Sovcomflot manages these matters as critical business activities, sets targets and objectives, measures, analyses and reports performance internally and externally. SCF continually looks for ways to reduce the environmental impact of its operations and services.

Honesty

SCF insists on honesty, integrity and fairness in all aspects of its business and expects the same in the relationships it has with those with whom it does business.

Respect

SCF respects the human rights of its employees and provides them with good and safe working conditions, and competitive terms and conditions of employment.

Motivation

SCF promotes the development and best use of the talents of its employees and creates an inclusive work environment where every employee has an equal opportunity to develop his or her skills and talents. SCF encourages the involvement of employees in the planning and direction of their work and provides them with channels to report concerns. SCF recognises that commercial success depends on the full commitment of all its employees.

In order to protect the Company's reputation SCF employees should not use SCF's name, logo, trademarks, vessels, facilities for personal use without prior authorization or prior agreement. SCF's brand and trademarks represent the Company's image and reputation to the world. Sovcomflot's vessels displaying the SCF name and logo represent those values around the world and it is the combined effort of all employees at sea and onshore to safeguard and promote Sovcomflot's highest industry standards and values.

In order to ensure that business relationships are formed only with reputable and qualified counterparties all SCF staff should evaluate potential partners, suppliers and service providers based on the applicable procedures and the "Know Your Supplier" Questionnaire, where required. Additional information about the due diligence process applicable to third parties is to be found in the Sovcomflot Anti-Bribery and Corruption Policy (ABC Policy).

3. Health Safety Security Environment (HSSE) Excellence

Sovcomflot commits to the highest HSSE standards and best industry practices in all its operations to protect People, Environment, Assets and Reputation. All employees shall ensure adherence to all relevant and applicable rules, regulations and procedures which are in force across the Sovcomflot Group.

To maintain its reputation as one of the leading ship management companies in the world, building on its expertise through innovative solutions, Sovcomflot is always aiming to abide by its watchword "Safety Comes First" and to achieve operational excellence in the provision of ship management services.

In order to maintain and develop HSSE standards of excellence SCF consistently aims for:

- Zero injuries to people
- Zero damage to the environment and a constant reduction of its environmental impact by using energy efficient systems

- Zero damage to the Company's assets
- Zero damage to the Company's reputation
- Zero rule breaking
- Zero tolerance to any form of bribery or corruption

SCF's main mission is to meet and exceed its customers' and stakeholders' expectations, ensuring stability, growth and value. To achieve this goal all SCF employees are expected to adhere to the following safety and quality guidelines:

- One "Safety Comes First" culture across the entire organization requiring all vessels, shore personnel and contractors to demonstrate their commitment to this goal and to lead by example, continuously promoting a culture of safety
- To control and minimize all identified risks to a level that is low as reasonably practicable thus creating a healthy and safe working environment for all employees
- Business Continuity ensuring that adequate financial and human resources are made available in all our business operations including the resources required to maintain the Company's Safety Management System
- Results-oriented teamwork as a valuable asset by recognizing the strengths, capabilities and limitations of the people within a team and to take the best advantage of the attributes of each team member
- Continuously focus attention on the business, Company and vessel rather than only on the implementation of individual functions
- Only operate vessels with Masters and Officers who have the appropriate competence, experience and training on the particular type and size of vessel
- Ensure that every voyage is carried out with the utmost efficiency to maximize profit through optimization of voyage costs and improvement of TCE, without compromising the safety and quality of day-to-day operations or compliance with the terms and conditions of the fixture as agreed between Sovcomflot and the charterers
- Safe Navigation Excellence on all vessels as the foremost objective for the safety of people, the environment, assets and the protection of SCF's reputation
- Establishing and maintaining measures needed to prevent unlawful actions that might threaten the safety and security of personnel and property on board the Company's vessels
- Follow all safety requirements and ensure appropriate behaviour at all workplaces, whether on board or onshore
- Continuously look for ways to make it easier for parties to do business with Sovcomflot
- Promote honesty, integrity, transparency and the highest standards of business and personal ethics
- Be prepared to respond to potential emergency situations

4. Working Conditions

Sovcomflot Group is extremely sensitive to safety conditions on board its vessels and other workplaces wherever its people may be located. SCF's safety principles and procedures are based on augmenting Russian maritime traditions which are themselves based on respect for knowledge and experience accumulated over decades.

All SCF employees shall exercise due diligence when using the Company's property in order to ensure its proper maintenance, security, handling and operation. An employee may be held responsible for any losses caused as a result of the mistreatment or wrongful use (which may include personal use or removal) of SCF property.

All SCF employees are responsible for the safety and security of their workplaces. Employees should comply with all applicable personal security and fire safety regulations and other similar standards, as well as any related country or regional safety polices. All staff should refrain from making verbal or physical threats or commit any acts that adversely impact the work environment. A safe, secure and healthy work environment is one that is free of the adverse effects of drug and alcohol abuse.

Sovcomflot maintains training centers where SCF crews receive regular training and refresher courses. All sea-going personnel engaged in this important element in Sovcomflot's system of professional development and safety awareness, should exercise diligent care while attending such trainings and courses.

All employees are expected to maintain and improve their professional skills. Employees are also expected to perform tasks safely, efficiently and effectively using their qualifications, knowledge and experience, and to interact successfully with other people, systems and equipment. All employees should strive to work effectively as a team exercising cooperation and the willingness to work together to achieve a common goal.

In their work all SCF employees should maintain good situational awareness by accurately perceiving the immediate environment around them and any relevant external factors, predicting their status in the near future, and developing effective strategies to manage threats or risks.

All employees should exercise personal assessment of their work and processes in order to ensure compliance with this Code of Conduct and all other SCF rules and procedures.

5. Confidentiality

Sovcomflot Group places the highest value on the confidentiality of business or personal information, intellectual property and has in place systems to comply with the applicable laws and regulations in respect of personal data and to protect personal data and other confidential information which it collects, uses and maintains about its staff, including, but not limited to, social, medical and background check information. Employees who handle personal information should safeguard such information and use or share it only for the purpose for which it was collected and only with authorized persons. Sovcomflot requires companies or individuals that provide services to Sovcomflot to protect personal and confidential information they receive about its workforce.

Employees should always follow applicable laws when collecting, sending, storing and using information about other SCF staff wherever they are located, including in locations other than the workplace. Personal and confidential information should only be disclosed to regulatory bodies and counterparties based on lawful and justified requests.

SCF employees are obliged to safeguard personal, proprietary and confidential information that they obtain or create in connection with their activities for Sovcomflot, regardless of its form, both during or after ceasing their employment with SCF. All employees should use any relevant information only for their work purposes. All employees should assume that any information they receive about Sovcomflot, its workforce, suppliers, vendors, business partners or shareholders is confidential information and should be protected from disclosure. It is important to ensure that business-related documents are produced, copied, faxed, transmitted, filed, stored and disposed of by means designed to prevent unauthorized disclosure of, or access to, such information.

The following rules should be followed in order to ensure proper confidentiality:

- Secure access to computers and work areas to prevent unlawful interference. Change login passwords on business computers regularly. Sensitive information should be stored on removable media only when required in the performance of assigned duties and must be encrypted.
- Ensure compliance with the Company's clean desk policy - remove all sensitive/confidential materials from workstations and lock them in a secure place when the items are not in use or when an employee leaves his/ her workstation.
- Refrain from discussing sensitive matters or proprietary or confidential information in public places such as elevators, hallways, restaurants, restrooms and public transportation or on the internet in blogs and social networking sites.
- Exercise caution when using mobile phones or other communication devices or messaging services, and take care when discussing confidential or proprietary information in open workplace areas.
- Inform your manager or the PAO Sovcomflot Head of the Legal Department and/or PAO Sovcomflot Compliance Head, if you believe you have received confidential information inappropriately.
- Return all means of access to SCF information when your employment ends.

6. Ethical Behaviour

Sovcomflot promotes ethical behavior in the work environment. Employees are encouraged to prevent discrimination based on a person's race, sex, gender, colour, religion, national origin, nationality, citizenship, age, physical or mental disability or medical condition, marital status, culture, ancestry, military status, veteran's status or employment status. Discrimination and harassment are completely inconsistent with the Company's policy of providing a respectful, professional and dignified workplace. Sovcomflot is committed to promptly investigating any allegations of harassment or discrimination, handling any such investigations with sensitivity and taking appropriate disciplinary action to the fullest extent possible permitted by local law. Any retaliation against individuals for raising claims or concerns regarding discrimination, harassment or intimidation or for participation in the investigation of any such claim or concern is prohibited.

Sovcomflot strives to be a company with a healthy work environment where people are respected and valued. Sovcomflot creates equal opportunities for the professional development of all employees. SCF employees are encouraged to treat each other with mutual respect and dignity.

Sovcomflot Group and its employees undertake not to enter into any activity considered to be illegal, unethical or immoral or of such nature that it can adversely affect the integrity or reputation of SCF.

7. Press and Social Media

Each SCF employee is responsible while at work and when away from work for safeguarding the reputation of the Company. Sovcomflot Group employees should not claim, nor imply that they are speaking on behalf of the Company, unless duly authorized to do so. Employees should owe a duty of loyalty and respect when publicly communicating in press or in social media (which includes printed materials, such as, newspapers, books, articles and to the internet, such as, multimedia, social networking web sites, blogs and wikis both for professional and personal use) and it is prohibited to share sensitive or confidential information about SCF on personal social media without prior authorization. SCF employees should take care not to mislead readers/followers into thinking that a comment or post has been made on behalf of Sovcomflot, no matter whether or not Sovcomflot is mentioned in any such post or blog. Posting any content on social media in breach of this Code of Conduct may result in disciplinary action and or termination of the relevant employment contract.

8. Conflicts of Interest

Sovcomflot aims at avoiding conflicts of interest and to behave and act transparently in any area of its business dealings. Employees are encouraged to avoid any conflicts of interest or even the appearance of any such conflict. Personal interests of employees must not interfere with SCF's goals and stakeholders' interests. Business decisions should be driven by business reasons, rather than by individual personal gain. Employees should evaluate situations which could potentially lead to a conflict of interest and promptly report any concerns to their business manager or to the Sovcomflot Anti-Bribery Officer and/or PAO Sovcomflot Compliance Head and/or PAO Sovcomflot Head of the Legal Department. Employees should always use their fair judgment to manage, mitigate and avoid potential conflicts of interest.

Sovcomflot is committed to the prevention of bribery in its business dealings around the world. All employees are expected to conduct business and operations in accordance with the highest standards of business conduct, which include compliance with all applicable laws prohibiting bribery, corruption, fraud, while also always avoiding the appearance of any wrongdoing. All employees should strictly avoid any situations which might give rise to the risk of bribery in their dealings with third parties, which may include inter alia but are not limited to: (i) giving or accepting or allowing a close family member to accept a payment (including cash or cash equivalents such as gift certificates, vouchers or bank cards), gifts or hospitality with the expectation or hope that an advantage will be received, or to reward a business advantage already given; (ii) giving or accepting a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome of such negotiations or tender (this includes giving or accepting a gift or hospitality in return for the withdrawal of a tender or inducing someone to withdraw a tender); (iii)

accepting a payment, gift or hospitality from a third party where there is a risk that it is offered with the expectation that it will provide a business advantage for them or anyone else in return; (iv) accepting hospitality from a third party that is unduly lavish or extravagant under the circumstances.

Whenever SCF employees are engaged in any outside business, political or pro bono activities there is the risk of potential conflict of interest. Employees are encouraged to comply with any applicable laws and regulations and maintain the highest standards of personal and professional integrity to ensure real and potential conflicts of interests are appropriately managed or mitigated, which may include not engaging in any such outside activity.

For more detailed information on countering bribery and corruption SCF employees are urged to refer to the Sovcomflot Group Anti-Bribery and Corruption Policy (ABC Policy).

9. Documentation Retention

Sovcomflot aims to maintain accurate and complete records and documentation. All employees are responsible for the integrity of data and information, including reports and documents under employees' control. To achieve best practice in document retention employees should maintain records in sufficient detail, follow appropriate accounting standards, and store and file relevant documents appropriately subject to any retention terms as specified by relevant procedures or applicable regulations. Employees should not destroy or alter any records that are potentially relevant for audits, investigations or claims.

All SCF staff should always remember that communications and files created by an employee during the course of business are the property of the Company and not the private property of employees. Sovcomflot may at any time review and audit any files and records of employees to ensure compliance with this rule in the best interests of business integrity.

10. Modern Slavery and Human Trafficking Statement

Sovcomflot's strategy is to offer 'best in class' integrated commercial and technical services underpinned by a culture of a socially responsible business with ethical behavior as its core value. SCF recognizes that slavery, servitude, forced labor and human trafficking ("Modern Slavery") is a global and growing issue. No sector or industry can be considered immune. Sovcomflot is committed to ensuring that there is no Modern Slavery of any kind within its operations or supply chains.

Sovcomflot promotes a zero-tolerance approach to Modern Slavery (which involves the deprivation of a person's liberty by another to exploit them for gain either personally or commercially) and believes that respect of human rights is integral to being a responsible company.

Sovcomflot is committed to providing a workplace free of any form of harassment or discrimination and expects all SCF suppliers to do the same. The supply chains supporting SCF's business comprise suppliers providing a wide range of support functions and products including but not limited to services such as equipment maintenance, information technology, cleaning and security. Sovcomflot Group is committed to building and strengthening existing policies and practices to eliminate Modern Slavery and human rights violations within its supply chains.

All SCF business functions have overall responsibility and accountability for preventing Modern Slavery in their supply chains (which measures include procurement policies and due diligence of suppliers, including "Know Your Supplier" Questionnaire and procedures) and commit to combating Modern Slavery and human trafficking anywhere within the SCF organization or its supply chains.

11. Open Reporting

If an employee has a concern about any activities in the Sovcomflot business, this Code provides a mechanism by which they can notify management. All notifications under this Code should be investigated as a matter of priority in order to reach a prompt resolution.

If an employee has a legitimate concern about, and holds a reasonable belief that the information he/she has, relates to one of the areas and he/she wishes to raise the concern in good faith, it could be raised with his/ her Manager / Director (if ashore) or the Master (if onboard) for resolution. If at any time an employee knows of, or suspects, any of the occurrences listed above in this Code of Conduct or any other legitimate similar concerns, they may also report the matter immediately to PAO Sovcomflot Head of the Legal Department and/or PAO Sovcomflot Compliance Head, so that appropriate action may be taken to deal with the situation.

If an employee prefers not to raise the matter with his/her management or he/she feels his/her management has not addressed the concern adequately and he/she wishes to raise the concern in good faith, he/she should raise this concern through Open Reporting tool available at the Company's official website – www.scf-group.ru

Open Reporting is a confidential way to get answers to questions and to raise concerns. Sovcomflot will provide crew members and other staff members with information about the Open Reporting prior to each employment and will also remind them of the availability of this reporting system by posting relevant notices in offices and crew mess rooms, the Engine Control Room (ECR), the Bridge and other common areas onboard.

The Company's Open Reporting strictly prohibits any retaliation against such 'Whistleblowers'. Whistleblowing reports sent through Open Reporting must be made without fear of reprisal and may be anonymous. Any victimization of an employee who reports openly, or any attempt to deter him/her from reporting openly, will be regarded as a serious disciplinary offence and will result in action under SCF's disciplinary procedures.

12. Commitment to Code of Corporate Conduct

Sovcomflot requires its employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. All employees should practice honesty, integrity and transparency in every respect of their dealings with clients, stakeholders, the business community, the public, suppliers, government authorities and the other employees of Sovcomflot.

Sovcomflot endeavors always to deal fairly with its clients, competitors, suppliers and employees. Sovcomflot shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misinterpretation of material facts, or any other unfair dealing practice.

Every SCF employee is responsible for adhering to this Code. Sovcomflot will review and monitor the relevant processes and activities to evidence compliance with this Code of Conduct and applicable laws and regulations. Any violation of established procedures may lead to negative consequences which may include disciplinary action up to and including termination of employment. Sovcomflot is committed to fostering and maintaining a culture of the highest ethics and moral principles among its employees in all the countries and territories where it operates.