

Palau International Ship Registry



Europe Head Office
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USA Head Office
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www.palaureg.com

MARINE CIRCULAR 140.2

To: ALL SHIPOWNERS, MANAGERS, MASTERS, and REGISTRATION OFFICERS OF MERCHANT SHIPS AND RECOGNIZED ORGANIZATION.

Subject: ACCEPTANCE OF MEDICAL PRACTITIONERS FOR SEAFARERS' MEDICAL EXAMINATION AND CERTIFICATES STCW Regulation I/9, par. 2

1. PURPOSE

The purpose of this Marine Circular is to ensure that those responsible for assessing the medical fitness of seafarers are dully qualified and apply the provisions of section A-I/9 of the STCW Code in the scope of seafarers' medical examination. Palau International Ship Registry (PISR) will not accept any Medical Certificate which has not been issued by an approved Medical Practitioner.

2. APPLICATION

This Marine Circular applies:

- ✓ To all seafarers willing to issue either a PISR Certificate of Competency (CoC) or a PISR Seafarer's Indedification Record Book (SRIB).
- ✓ All Medical Practitioners willing to become accepted by this Registry.

3. QUALIFICATIONS OF MEDICAL PRACTITIONERS

Palau International Ship Registry has an evaluation process for acceptance of Medical Practitioners, responsible for assessing the medical fitness of seafarers, who need to comply with the following:

- 3.1. Be a Licensed physician with independence from employers, workers and their representatives in exercising medical judgment with respect to examination procedures;
- 3.2. Be experienced in general and occupational medicine or maritime occupational medicine;
- 3.3. Be familiar with the STCW relevant requirements as this is a safe operational issue for all Vessels.
- 3.4. Be familiar with the requirements of PISR / MARINE NOTICE 194.1 about "SEAFARER MEDICAL EXAMINATION, MEDICAL STANDARDS AND CERTIFICATES"
- 3.5. PISR accepts Medical Practitioners approved by competent authorities of States that are parties to the Maritime Labour Convention 2006, the Medical Examination (Seafarers) Convention 1946 (ILO No. 73): or the Standards of Training Certification Watchkeeping (STCW).



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- 3.6. Interested Medical Practitioners shall submit to Palau International Ship Registry Administration in application together with all additional information documents duly signed. Upon Satisfactory review of an application providing information on the above requirements, a formal acceptance shall be issued by PISR Administration.

PISR in cooperation with regional Deputy Registrars (DR) shall create and keep available to any one concerned a data base with all information about the approved Medical Practitioners.

4. MEDICAL CERTIFICATES REQUIREMENTS

- 4.1. Medical certificates should be in the official language of the issuing country and in English.
4.2. For information about an accepted medical examination form, you may visit PISR website: <http://www.palaureg.com/product/mn-194-1seafarer-medical-examination-and-certificates/>
4.3. A Medical certificate is subject to revalidation at least every two years unless the holder is under 18 years in which case it is every year.

5. Medical Practitioners wishing to become accepted by PISR, may apply by sending a written request to:

PALAU INTERNATIONAL SHIP REGISTRY

Europe Head Office
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Medical Practitioners will be approved for a period of five (5) years, subject to renewal.

****This Marine Circular supersedes
Marine Circular 140.1**

Click [here](#) or use the below QR Code
for the list of the last updated Marine
Circular





APPLICATION FOR MEDICAL PRACTITIONER REGISTRATION

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PART 1. PERSONAL DESCRIPTION AND INFORMATION

	Surname	
	Given Name(s)	
	Date of Birth (mm/dd/yyyy)	
	Sex	<input type="checkbox"/> Male <input type="checkbox"/> Female
	Place of Birth (City and Country)	
	Citizenship	
	Permanent address (street, city and country)	
	Telephone Number	
	Email Address	
	Business address (street, city and country)	
	Business Telephone Number	
	Business Email	

PART 2. ADDITIONAL INFORMATION TO BE ACCOMPANIED WITH THIS APPLICATION

- Current CV
- Proof of accreditation by national medical registration authority
- Proof of current good standing by national medical registration authority
- Copy of valid passport or ID
- Signed the attached Non-Disclosure Agreement
- Signed the attached PISR Code of Conduct and Business Ethics
- Signed the attached PISR Anti Bribery Policy
- Signed the attached acknowledgement letter according to Anti-Bribery Policy

PART 3. AFFIRMATION BY MEDICAL PRACTITIONER

I _____, applicant, have read and understanding of Marine Circular 140.1 Acceptance of Medical Practitioners for seafarers medical examination and certificates STCW Regulation 1/9, par. 2, Marine Notice 194.1 Seafarer Medical Examination Medical Standards and Certificates and the ILO/WHO publication Guidelines for Conducting Pre-sea and Periodic Medical Fitness Examinations for Seafarers, as may be amended by any subsequent publication and agree to abide by the policy and guidelines contained therein.

I _____, applicant, further agree to notify the Palau International Ship Registry upon any material changes to the information contained in this application and affirm that the contents of this application and supporting material are true under the penalties of law.



Scan to download this application form

Signature - Stamp

Date



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NON-DISCLOSURE AGREEMENT

Confidential Information

We set out below Palau International Ship Registry's Confidentiality Undertaking Clause which bounds all individuals directly or indirectly employed/appointed by Palau International Ship Registry (PISR), including but not being limited to the employees, officers, directors, consultants, auditors, surveyors and representatives, hereinafter referred to as '**the Parties**'. This Agreement shall survive even after the termination of the Parties' direct or indirect employment/appointment with/by PISR.

1. The Parties agree that they must not at any time during their direct or indirect employment and/or appointment (except so far as may be necessary for the proper performance of their duties) or after the termination of their employment/appointment:
 - a) Use to the detriment or prejudice of PISR or divulge to any person (other than with proper authority or in the proper performance of their duties -as these are stated in the Contact, Employment and/or Appointment Agreement, or as required by law or a court or authority of competent jurisdiction) any Confidential Information or information (whether confidential or not) concerning the business, finances, transactions or affairs of PISR which may have come to their knowledge during their employment/appointment, except for information which may come into the public domain other than by reason of a disclosure by the Parties which is in breach of the Parties' obligations under this clause.
 - b) Use to the detriment or prejudice of PISR or divulge to or discuss with any person (other than with proper authority or as required by law or a court or authority of competent jurisdiction) their knowledge of clients of PISR or of their business or that of PISR's business, gained during their employment/appointment for any purpose whatsoever. The Parties shall not, without the written consent of PISR, publish any articles, postings or participate in discussions (other than within PISR) where such relate to the business of PISR.
2. The Parties agree that they shall promptly whenever requested by PISR and, in any event upon the termination of their direct or indirect employment/appointment with/by PISR, deliver any Confidential Information and all PISR property and documents in their possession or under their control in any format (whether prepared by the Parties or any other person and whether stored electronically, on paper or otherwise), including -but not limited to- lists of clients, correspondence, papers and records, software, databases and course codes which may have been prepared by the Parties or have come into their possession in the course of their employment/appointment with/by PISR. The Parties shall not (other than in the proper performance of their duties as these



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are stated in the Employment, Contact and/or Appointment Agreement be entitled to and shall not retain any copies thereof or extracts therefrom. Any copyright, and rights in the nature of copyright, subsisting in any of the said documents which have been created by the Parties in the course of and relating to their employment with PISR shall vest in PISR.

3. The Parties may not remove any documents or electronic or other media containing any Confidential Information from the premises of PISR at any time without proper advance authorization. All such documents, electronic or other media and any copies are PISR's property.

Personal Data

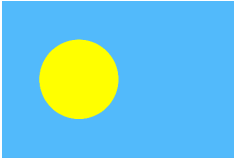
1. The Parties shall comply with all relevant data protection legislation (GDPR) regarding data protection when processing personal data in the course of employment/appointment including personal data relating to -but not being limited to- any employee, external supplier, direct client, agent etc. of PISR.
2. In order to manage the Parties' contract of employment and for related purposes, such as updating and enhancing our records, analysis for management purposes, legal and regulatory compliance and crime prevention, the Parties have supplied us with their personal data and we can therefore process, use and disclose personal data about the Parties as is necessary in compliance with data protection legislation. Some data may be supplied to external suppliers who administer employee benefits, solely for the purpose of providing those benefits to the Parties.

Name:

Date:

Signature:





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ACKNOWLEDGEMENT LETTER ACCORDING TO ANTI-BRIBERY POLICY

Full Name:

Job Title:

Company / Department:

If you are unable to make any of the statements contained in this certificate in good faith, unconditionally and without exception, you should consult the Management Director.

I have read and understood the Anti-Bribery Policy and the Compliance Manual of PISR ("Politics"). I am fully familiar with its content and agree to abide by and implement the provisions of the Policy as a condition for my employment.

All PISR's employees, officers, directors, consultants, auditors, surveyors, representatives and any individual cooperating with PISR whatsoever who refer to me have been informed of this Policy and have received a copy of it.

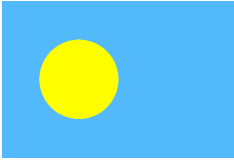
I am not aware of the existence of any gift, offer, promise, agreement or authorization prohibited by the Policy nor the existence of any offence of accounting requirements, record keeping requirements or financial audit requirements which are referred in the Policy or the Code of Business Conduct.

I do not know any facts that constitute valid grounds for suspecting an offence of the Policy statement by any person who is subject to it.

Date:

Signature:





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APPENDIX B

PROVISION FOR AGREEMENTS WITH THIRD PARTIES / CONTRACTORS

..... confirms the receipt of the Anti-Bribery Policy and the Compliance Manual ("Policy") of PISR and agrees that he/she and all members of the BoD, executives, employees, suppliers, subcontractors, joint venture partners will comply, in fulfilling their obligations under the Contract, with the Policy as applicable to third parties.



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Code of Business Conduct and Ethics

Adopted on 04.06.2018

1. Introduction

This Code of Business Conduct and Ethics (**'the Code'**) has been adopted by the Chief Executive Officer (**'the CEO'**) of Palau International Ship Registry (**'PISR'**) and summarizes the standards that must guide our actions. While covering a wide range of business practices and procedures, these standards cannot and do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather set forth key guiding principles that represent PISR's policies and establish conditions for indirect or direct employment at PISR.

We must strive to foster a culture of honesty and accountability. Our commitment to the highest level of ethical conduct should be reflected in all of the PISR's business activities including, but not being limited to, relationships with employees, customers, suppliers, competitors, the USA and Palau Governments and the public. All of our employees, officers, directors, consultants, auditors, surveyors, representatives and any individual cooperating with PISR whatsoever (**'The Parties'**) must conduct themselves according to the language and spirit of this Code and seek to avoid even the appearance of improper behavior. Even well-intentioned actions that violate the law or this Code may result in negative consequences for PISR and for the individuals involved in its practices.

One of PISR's most valuable assets is its reputation for integrity, professionalism and fairness. We should all recognize that our actions are the foundation of our reputation and adhering to this Code and applicable law is imperative.

2. Compliance with Laws, Rules and Regulations

We are strongly committed to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules and regulations. No employee, officer or director of PISR shall commit an illegal or unethical act, or instruct others to do so, for any reason.

3. Compliance with PISR Anti-Bribery/Anti-Corruption Policy

PISR enforces **ISO 37001:2016** and continuously maintains a compliance and ethics scheme to educate cooperating individuals about laws designed to prevent bribery and corruption, as well as violations of these laws. The Parties are expected to conduct business on a legal and ethical basis. Improper gifts, payments or offerings of anything of value to customers, partners, government officials or other third parties could form violations of the Anti-Corruption Laws and might jeopardize the



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Registry's growth and reputation. The use of Registry's funds or assets for any unlawful, improper or unethical purpose is prohibited.

4. Trading on Inside Information

Using non-public, business information to trade in securities, or providing a family member, friend or any other person with a "tip", is illegal. All non-public, business information should be considered inside information and should never be used for personal gain.

5. Protection of Confidential Information

Confidential information generated and gathered in our business is a valuable asset to PISR. Protecting this information plays a vital role in our continuous growth and ability to compete, and all information should be maintained in strict confidence, except when disclosure is authorized by PISR or required by law.

Confidential information includes all non-public information that might be useful to competitors or that could be harmful to PISR, its customers or its suppliers if disclosed. Intellectual property, such as trade secrets, patents, trademarks and copyrights, as well as business, research and new business plans, objectives and strategies, records, databases, salary and benefits data, employee medical information, customer, employee and suppliers lists and any unpublished financial or pricing information must also be protected.

Unauthorized use or distribution of confidential information violates PISR's policy and could be illegal. Such use or distribution could result in negative consequences for both PISR and the individuals involved, including potential legal and disciplinary actions.

The Parties' obligation to protect PISR's confidential information continues for five (5) years even after their direct or indirect employment and/or appointment is ceased, and the Parties must return all information in their possession upon leaving PISR.

6. Conflicts of Interest

The Parties have an obligation to act in the best interest of PISR and they shall avoid situations that present a potential or actual conflict between their interest and the interest of PISR.

A "conflict of interest" occurs when a person's private interest interferes in any way, or even appears to interfere, with the interest of PISR, including its subsidiaries and affiliates. A conflict of interest may arise when the Parties take an action or have an interest that may make it difficult for them to perform their work objectively and effectively.



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Situations involving a conflict of interest may not always be obvious or easy to resolve. The Parties shall report actions that may involve a conflict of interest to PISR's Compliance Officer through e-mail at compliance@palaureg.com.

7. Protection and Proper Use of PISR Assets

Protecting PISR assets against loss, theft or other misuse is the responsibility of every employee, officer and director. Any suspected loss, misuse or theft should be reported to a manager or supervisor.

The sole purpose of PISR's equipment, supplies and technology is the conduct of our business. They may only be used for business/actions consistent with PISR's guidelines.

8. Corporate Opportunities

The Parties are prohibited from taking for themselves business opportunities that are discovered through the use of corporate property, information or position. The Parties must refrain from using corporate property, information or position for personal gain, and they are prohibited from competing with PISR. Competing with PISR may involve engaging in the same line of business as PISR, or any situation where the Parties take away from PISR opportunities for provision of services. The Parties owe a duty to PISR to advance its legitimate interests when the opportunity to do so arises.

9. Fair Dealing

The Parties should endeavor to deal fairly with employees, customers, suppliers, Deputy Registrars, Flag State Inspectors, competitors, the public and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No bribes, kickbacks or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. PISR and any of the Parties involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this policy. Occasional business gifts to, or entertainment of, non-government employees in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of PISR. However, these gifts should be given infrequently, and their value should be modest. Gifts or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted.



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10. Compliance with This Code and Reporting of Any Illegal or Unethical Behavior

The Parties are expected to comply with all of the provisions of this Code. The Code will be strictly enforced, and violations will be dealt with immediately, including by subjecting breaching Parties to corrective and/or disciplinary action such as dismissal or removal from office. Violations of the Code that involve illegal behavior will be reported to the appropriate authorities.

Situations which may involve a violation of ethics, laws, rules, regulations or this Code may not always be clear and may require the exercise of judgment or the making of difficult decisions. The Parties should promptly report any concerns about a violation of ethics, laws, rules, regulations or this Code to PISR's Compliance Officer through e-mail at compliance@palaureg.com.

PISR encourages all Parties to report any suspected violations promptly and intends to thoroughly investigate any good faith reports of violations. PISR will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith. Open communication of issues and concerns by the Parties without fear of retribution or retaliation is vital to the successful implementation of this Code. The Parties are required to cooperate in any internal investigations of misconduct and unethical behavior.

11. Equal Opportunity, Non-Discrimination and Fair Employment

PISR's policies for recruitment, advancement and retention of cooperating individuals forbid discrimination on the basis of any criteria prohibited by law, including but not limited to race, sex and age. Our policies are designed to ensure that employees are treated, and treat each other, fairly and with respect and dignity. In keeping with this objective, conduct involving discrimination or harassment of others will not be tolerated. The Parties are required to comply with PISR's policy on equal opportunity, non-discrimination and fair employment, copies of which were distributed and are available from the legal department.

Your signature below indicates that you have read, understood and agreed with the provisions of this Code of Conduct.

Name:

Date: _

Signature: _



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Data Protection Statement

GDPR Compliance

1. Introduction/ Important Legal Notice

The EU General Data Protection Regulation (“GDPR”) comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age. The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardize data protection laws and processing across the EU, affording individuals stronger, more consistent rights to access and control their personal information.

2. Our Commitment

Palau International Ship Registry is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognize our obligations in updating and expanding this program to meet the demands of the GDPR. PISR is dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarized in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

Prior to providing us with any personal data, you should read through our Policy in full and make sure that you are comfortable with our privacy practices.

3. How are We Preparing for the GDPR

3.1. PISR already has a consistent level of data protection and security across our organization, however it is our aim to be fully compliant with the GDPR by carrying out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.



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3.2. Policies & Procedures

PISR adopts data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

- **Data Protection:** Our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
- **Data Retention & Erasure:** We have updated our retention policy and schedule to ensure that we meet the 'data minimization' and 'storage limitation' principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new 'Right to Erasure' obligation and are aware of when this and other data subject's rights apply; along with any exemptions, response timeframes and notification responsibilities.
- **Data Breaches:** Our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
- **International Data Transfers & Third-Party Disclosures:** Where PISR stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with enough adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those countries without. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
- **Subject Access Request (SAR):** We have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.



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- 3.3. Legal Basis for Processing:** We are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR are met.
- 3.4. Privacy Notice/Policy:** We are revising our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- 3.5. Obtaining Consent:** We are revising our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
- 3.6. Direct Marketing:** We are revising the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
- 3.7. Processor Agreements:** Where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting etc), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organizational measures in place and compliance with the GDPR.
- 3.8. Special Categories Data:** Where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements and have high-level encryptions and protections on all such data. Special category data is only processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

4. Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide ways to access information of an individual; via familiarization procedure; right to access any personal information that PISR processes about them and to request information about:



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- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

5. Information Security & Technical and Organizational Measures

PISR takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures, including but not limited to:

- i) Encryption of storage media, backup devices, laptops, mobile phones etc.
- ii) Firewall utilizing Intrusion Prevention System / Intrusion Detection System
- iii) Accountability for any file access needed by the personnel
- iv) Physical security utilizing card access control system
- v) Anti-virus and endpoint management software
- vi) Secure LAN & Wi-Fi infrastructure
- vii) Logging – Log analysis & Audit software
- viii) All data media is monitored, and all actions are logged
- ix) All data leaving the Company is under Data Loss Prevention techniques
- x) All access outside the Company is under monitored way
- xi) There is appropriate infrastructure providing accountability, creditability and authenticity



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6. GDPR Roles and Employees

PISR has a designated data privacy team to develop and implement our roadmap for complying with the new data protection Regulation. The team is responsible for promoting awareness of the GDPR across the organization, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures. PISR understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and has involved our employees in our preparation plans. We have implemented an employee training program specific to the which will be provided to all employees prior to May 25th, 2018, and forms part of our induction and annual training program.

7. Data Protection Officer:

If you have questions about the processing of your personal data, you can contact our Data Protection Officer directly. He is also at your service in cases regarding access requests, applications or complaints:

E-mail: compliance@palaureg.com



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Anti-Bribery & Anti-Corruption Policy

Revision	Revision Date	Prepared by	Reviewed by	Approved by
Initial	08.06.2018	Ms. Kleopatra Michalakopoulou	Ms. Leslie Mezzich	Mr. Panos Kirnidis

The Purpose of Palau International Ship Registry (PISR)

PISR deals with the provision of Ocean, Coastal and Interior Water Vessels' registration and documentation services, as well as with the provision of Vessels' inspection, certification, plan approval, technical assistance and investigation services. What is more, PISR provides mortgage and financial charter recordation services and undertakes the issuance of officers' and crew documents, the approval of training centres and STCW training courses.

PISR declares that the present Anti-Bribery & Anti-Corruption Policy is appropriate to its purpose, as this is stated above.

Scope

PISR (hereinafter 'the Organization') enforced and continuously maintains a compliance and ethics scheme to educate employees, officers, directors, consultants, auditors, surveyors, representatives and any individual cooperating with PISR whatsoever ('The **Parties**') about laws designed to prevent bribery and corruption, as well as violations of these laws. In light of this, **this Policy prohibits bribery.**

The scope of the present Anti-Bribery & Anti-Corruption Policy ("the Policy") is to aid the Organization to comply with applicable laws (Art. 235 on passive bribery and Art. 236 on active bribery of the Greek Criminal Code, the Civil Law Convention on Corruption ratified by Law 2957/2001 and the Law 4320/2015). **Applicable laws prohibit the Organization and the Parties to bribe any person or entity.**

The Organization is also required to keep accurate and complete records and to maintain proper internal accounting controls on an annual basis or when a bribery action is reported by one of the Parties or any interested party in general.

All personnel are expected to conduct business on a legal and ethical basis. Improper gifts, payments or offerings of anything of value to customers, partners, government officials or other third parties could form violations of the applicable laws and might jeopardize the Organization's growth and



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reputation. The use of Organization's funds or assets for any unlawful, improper or unethical purpose is strictly prohibited.

Policy Statement

The Organization has implemented this Policy against violations of applicable laws governing anti-bribery and anti-corruption, along with complementary standards and procedures required to be followed by the Organization's Parties with responsibilities that include interactions with third parties on behalf of the Organization.

This Policy, and its standards and procedures, are intended to reduce or eliminate conduct that may violate the applicable laws.

This Policy extends to all of the Organization's domestic and foreign operations, including operations conducted by any department, agent, contractor or other representative. This Policy also extends to all of the Organization's financial record-keeping activities.

Although the manner in which the Organization may obtain or retain business, is a manner that may create an environment in which the risk of bribery or other corrupt behavior is increased, it is against the Organization's policy to bribe any person, directly or indirectly. There are laws that prohibit commercial bribery, and the Parties must not knowingly violate any such laws or engage any third-party agents that may knowingly violate any such laws or engage any third-party agents that may knowingly violate such laws. Parties responsible for the engagement of third-party agents should use the procedures established in this Policy.

If any of the Parties or any interested party has any queries about the application of the anti-bribery provisions in general, or the use of these Policy guidelines in connection with a transaction, then he or she should consult with the Anti-bribery Officer of PISR by sending an e-mail to: compliance@palaureg.com. **Parties are encouraged to raise concerns in good faith, or on the basis of a reasonable belief in confidence, without fear of reprisal.** Furthermore, any interested party can contact the Anti-Bribery Officer to report any illegal and dubious business activities carried out by the Organization via e-mail to: compliance@palaureg.com.

The Organization's procedures are designed in such a way so that Parties will exercise due care to refrain from delegating substantial discretionary authority to individuals, within or outside the Organization, who an officer or employee, or any of the Parties, knows, or should know through the exercise of reasonable due diligence, may engage in illegal activities.



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The Organization conducts reviews on an annual basis of its corporate policies and compliance schemes regarding the anti-corruption laws of each jurisdiction to which the Organization, or the Parties may be subject.

Summary of Anti-Corruption Laws

Anti-bribery Provisions

This policy prohibits bribery to third parties, including but not limited to business people and foreign officials in order to obtain or retain business or to secure any improper advantage.

For purposes of this Policy, a “*foreign official*” means any employee or agent of a foreign government or of a “*public international organization*,” any person acting in an official capacity for or on behalf of a foreign government or government entity or of a public international organization, any foreign political party or party official, or any candidate for foreign political office. Thus, foreign officials include not only elected officials, but also consultants who hold government positions, employees of companies owned by foreign governments, political party officials and others.

As this Policy prohibits both direct and indirect payments to third parties, the Organization can be liable for improper payments made by its agents or other business associates. Accordingly, corrupt behavior is not excused by inserting a third party between the Organization and the prospective customer or foreign official. Nor is the Organization excused where such behavior was not sanctioned by the Organization, but it knew or should have known that the agent or business associate it employed was likely to engage in such activity based on readily available information.

Record-Keeping, Accounting and Payment Practices

The record-keeping provisions of applicable laws require the Organization to keep its books, records and accounts in reasonable detail, accurately and such that they fairly reflect all transactions.

Thus, this Policy prohibits the mischaracterization or omission of any transaction on the Organization’s books or any failure to maintain proper accounting controls that result in such a mischaracterization or omission. Keeping detailed, accurate descriptions of all payments and expenses is crucial for compliance purposes.

Accordingly, the Parties must follow applicable standards, principles, laws and Organization practices for accounting and financial reporting. In particular, the Parties must be timely and complete when preparing all reports and records required by management. Prior to paying or authorizing a payment to a third party, the Parties should be sure that no part of such payment is to be made for any purpose other than that to be fully and accurately described in the Organization’s books and records. No one may create an undisclosed or unrecorded account of the Organization for any purpose. False, artificial



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or inaccurate entries may not be made in the books and records of the Organization for any reason. Finally, personal or third-party funds may not be used to accomplish what is otherwise prohibited by the Organization's policy.

Internal Controls

The Organization has an obligation to establish effective accounting controls over all of its business transactions. This legal duty is satisfied by devising and maintaining a system of internal accounting controls sufficient to provide reasonable assurances that:

- transactions are executed in accordance with management's general or specific authorization;
- transactions are recorded as necessary (a) to permit preparation of financial statements in conformity with generally accepted accounting principles and (b) to maintain accountability for assets;
- access to assets is permitted only in accordance with management's general or specific authorization.

The Parties are expected to facilitate Organization's compliance with its legal requirements to maintain adequate internal accounting and transactional controls and to cooperate fully with the Organization's accountants, internal and external auditors, and all other personnel designated or appointed by the Organization to enact and monitor these accounting and financial controls. Any attempt by one of the Parties to mislead these internal accounting and financial controls, or a failure by any of the Parties to cooperate fully with the Organization's accounting personnel charged with devising and maintaining these internal controls, is a serious breach of the Organization's policy, which may result in disciplinary action up to and including termination of employment for cause.

PISR ensures the independent nature of any such control and/or audit, regardless of whom it is executed and/or managed by.

Due Diligence and Selection of Representatives and Business Partners

The Organization is dedicated to the dynamic and profitable expansion of its operations worldwide. The Organization will compete for all business opportunities vigorously, fairly, ethically, and legally, and will negotiate in a fair and open manner. Regardless of any circumstance, the Organization will conduct business using only legal and ethical means.

This practice of fairness and professionalism must extend to the activities of the Organization's agents, representatives and business partners, particularly those third parties who are in a position to violate laws concerning Anti-Corruption. Organization's management team must follow the Organization's requirements governing investigating, pre-qualifying, certifying and entering into agreements with parties who will act on behalf of the Company in international transactions. Such a party may be



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selected only after careful consideration of appropriate information and they must agree to appropriate monitoring and audit procedures by the Organization.

All contracts and contract renewals within the scope of the Anti-Corruption Policy will contain provisions that represent that the parties have not engaged in and will not engage in activities which contravene applicable anti-corruption laws. In addition, each agreement shall contain consent to the Organization's audit rights.

PISR takes pride in its commitment to satisfy anti-bribery management system requirements.

Applicability

All PISR Parties are required to adhere to established policy and standards. **Violation of PISR policy and standards may result in disciplinary action up to and including termination.** Any suspected violation of PISR policy or standard should be reported to the Anti-Bribery Officer.

Palau International Ship Registry remains committed to the continual improvement of the anti-bribery management system.

