

THE GREAT EASTERN SHIPPING COMPANY LIMITED

CODE OF BUSINESS CONDUCT AND ETHICS FOR THE BOARD OF DIRECTORS AND MEMBERS OF SENIOR MANAGEMENT

(Effective January 28, 2025)

INTRODUCTION

This Code of Business Conduct and Ethics ("the Code") is in line with the Company's philosophy on Code of Governance, which is based on openness, credibility and accountability, which is an essence for the Company's long term success.

This Code has been adopted by the Board of Directors and summarises the standards that must guide actions. This Code is intended to provide guidance and help in recognizing and dealing with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability.

Our commitment to the highest level of ethical conduct should be reflected in all of the Company's business activities including, but not limited to, relationships with officers, customers, suppliers, creditors, competitors, the government, the public, the shareholders and any other stakeholders. We should recognize that our actions are the foundation of our reputation and adhering to this Code and applicable law is imperative.

It is understood that some words and phrases in this Code are subject to varying interpretations and that any ethical principle may conflict with other ethical principles in specific situations. Questions related to ethical conflicts can best be answered by thoughtful consideration of fundamental principles. In case of conflict and questions arising/relating to interpretations, the decision of the Board shall be final.

A. APPLICABILITY

This Code is applicable to the following persons, referred to as Officials:

- Members of the Board
- Members of Senior Management.

'Senior Management' shall mean officers/personnel of the Company who are members of its core management team excluding board of directors and normally this shall comprise all members of management one level below the chief executive officer/managing director/whole time director/manager (including chief executive officer/manager, in case they are not part of the board) and shall specifically include persons identified and designated as key managerial personnel, other than the board of directors, by the listed entity. #&

The Compliance Officer shall maintain a list of Senior Management personnel to whom this Code will be applicable and shall keep the Board of Directors informed about any changes therein.

amended w.e.f. 12.02.2020
& amended w.e.f. 28.01.2025

The Company Secretary will be the Compliance Officer for the purposes of this Code.

This Code will come into force with effect from January 1, 2006.

All Officers must conduct themselves according to the language and spirit of this Code. Every officer must not only comply with applicable laws, rules and regulations but should also promote honest and ethical conduct of the business.

B. DUTIES AND OBLIGATIONS UNDER THE CODE:

1) HONEST AND ETHICAL CONDUCT

An Officer shall, at all time:

- a) act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct while working on the Company's premises, on Company's vessels, at offsite locations where the Company's business is being conducted, at Company sponsored business and social events, or any other place where Officer is representing the Company;
- b) act and conduct free from fraud and deception;
- c) conform to the best-accepted professional standards of conduct. Ethical conduct includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- d) maintain independence and impartiality in discharging responsibilities in the Company;
- e) do nothing, which is unbecoming of his conduct as an Officer;
- f) not commit any act which is illegal or considered unethical or induce his colleagues and/or subordinates to do so.
- g) not possess, consume or distribute prohibited drugs or substances whether at the workplace or otherwise.®
- h) follow the applicable safety norms.®

2) CORPORATE OPPORTUNITIES

Officers owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Officers are expressly prohibited from:

- a) taking for themselves personally, opportunities that emanate through the use of Company's property, information, or position;
- b) competing directly with the business of the Company or with any business that the Company is considering.
- c) promoting or allowing the above through family members or relatives without express written approval from the Compliance Officer.®

® inserted w.e.f. 12.02.2020

3) CONFLICTS OF INTEREST

A) All Officers should avoid situations that present a potential or actual conflict between their interest and the interest of the Company and not enter into situations, which affects ability to exercise sound judgement and is likely to lead to conflict of interest.

Personal involvement with a competitor, supplier, customer or their employees, which impairs an Officer's ability to exercise good judgement on behalf of the Company, creates an actual or potential conflict of interest.#

Dating or physical relationship between employees, which negatively impacts workplace environment, also creates an actual or potential conflict of interest.®

Conflict of Interest when occurs:

- i. A "conflict of interest" occurs when an Officer's private interest interferes in any way, or even appears to interfere, with the interest of the Company, including its subsidiaries and affiliates.
- ii. A conflict of interest can arise when an Officer takes an action or has an interest that may make it difficult for him to perform his or her work objectively and effectively.
- iii. Conflicts of interest may also arise when an Officer receives improper personal benefits (which includes physical relationships) as a result of the Officer's position in the Company.#

Although it would not be possible to describe every situation in which a conflict of interest may arise, the following are examples of situations, which may constitute a conflict of interest:

- a. Any outside business activity that detracts an individual's ability to devote appropriate time and attention to his or her responsibilities with the Company.
- b. The receipt of any favours or non-nominal gifts or excessive entertainment from any person/company with which the Company has current or prospective business dealings.#
- c. Any significant ownership interest in any supplier, customer, development partner or competitor of the Company.
- d. Any consulting or employment relationship with any supplier, customer, business associate or competitor of the Company.
- e. Competing with the Company for the purchase or sale of property, products, services or other interests.

amended w.e.f. 12.02.2020

® inserted w.e.f. 12.02.2020

- f. Directing business to an entity owned or managed by, or which employs, a relative or friend or batchmate.#

Batchmate will include classmate or someone who was in the same year in the same school, college or institute as the Officer concerned.

Where any business deal is being discussed with any such entity, the Officer concerned should refrain from participating in the decision making process, unless he has made complete prior disclosure.

- g. Dating or physical relationship between employees whether having a direct or indirect reporting relationship or otherwise with each other.®

The Officers should be scrupulous in avoiding 'conflicts of interest' with the Company. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the Compliance Officer who will report the same to the Whole Time Directors and if it involves Whole Time Directors then to the Audit Committee. Prior written approval should be obtained in all such cases.#

- B)^ Without prejudice to the generality of the foregoing, Whole Time Directors and members of Senior Management and their relatives have expressly been prohibited from entering into any kind of commercial / financial transactions or relationships with the competitors of the Company or its group entities or employees of such competitors.

Whole Time Directors and members of Senior Management shall forthwith terminate all such transactions or relationships, if any, and make complete disclosure of such termination within 15 days of this clause becoming effective to the Compliance Officer in the format enclosed as **Annexure 'E'**.

Whole Time Directors and members of Senior Management who do not have any such transactions or relationships shall also submit 'nil' disclosure within 15 days of this clause becoming effective to the Compliance Officer in the format enclosed as **Annexure 'E'**.

However, relatives of the Whole Time Directors and members of Senior Management may enter into such transactions or relationships, subject to the Whole Time Director or member of Senior Management obtaining prior approval from the Compliance Officer. Application for such approval may be made in the format enclosed as **Annexure 'F'**.

Application for approval of such pre-existing transactions or relationships by relatives shall be made in the format enclosed as **Annexure 'F'** within 15 days of this clause becoming effective to the Compliance Officer.

Whole Time Directors and members of Senior Management whose relatives do not have any such transactions or relationships shall also submit 'nil' disclosure within 15 days of this clause becoming effective to the Compliance Officer in the format enclosed as **Annexure 'F'**.

amended w.e.f. 12.02.2020

® inserted w.e.f. 12.02.2020

^ inserted on 29.10.2020

In case such transactions or relationships by relatives are not approved, the same shall be terminated forthwith and disclosure of such termination shall be made to the Compliance Officer within 15 days of intimation of such non-approval in the format enclosed as **Annexure 'F'**.

If such transactions or relationships are continued without making disclosure and obtaining approval within the stipulated period, the same shall be treated as violation of this Code.

4) PUBLIC DISCLOSURES

- a) The Company has the responsibility to communicate effectively with shareholders so that they are provided with full and accurate information, in all material respects, about the Company's financial condition and results of the operations.
- b) Reports and documents required to be filed with the Reserve Bank of India, Securities and Exchange Board of India, Stock Exchanges or other regulatory agencies and other public communications shall include full, fair, accurate, timely and understandable disclosure.#

5) FAIR DEALING

- a) Officers should endeavour to deal fairly with customers, suppliers, competitors, the public and one another at all times and in accordance with ethical business practices.
- b) They should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential, proprietary or trade secret information, misrepresentation of material facts, or any other unfair dealing practices.
- c) They should not restrict the freedom of choice and free competition in any manner while designing, promoting and selling the services of the Company.%
- d) No payment 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 favourable action.
- e) Giving and receiving occasional business gifts and entertainment in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of the Company's business. Gifts or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted.#

In case of receipt of any gift/entertainment of more than Rs. 10,000, the approval (pre/post) of the Compliance Officer should be obtained by the Officers.*

The Compliance Officer shall, in turn, keep the Managing Director informed about such approvals from time to time.\$

*Amended w.e.f. August 10, 2018
\$ Inserted w.e.f. February 12, 2020
#Amended w.e.f. 12.02.2020
% inserted w.e.f. October 29, 2021

f) All Officers shall ensure that he/she, any of their relatives or any firm, company or association in which the relative is associated in any significant role, shall not enter into any transaction with the Company.

If such a related party transaction is unavoidable, they must fully disclose the nature of the related party transaction to the Compliance Officer for consideration and take prior permission. Any dealings with a related party must be conducted in such a way that no preferential treatment is given to that party.[§]

6) TRADING ON INSIDE INFORMATION

a) In the normal course of business, Officers may come into possession of significant, price sensitive information. This information is the property of the Company. Using non-public information to trade in securities, or providing a family member, friend or any other person with a 'tip' is illegal. All non-public information should be considered inside information and should never be used for personal gain.

b) Officers should comply with the Company's Insider Trading Code, follow the pre-clearance procedures for trading and trade only when the trading window is not closed. Insider trading rules are strictly enforced, even in instances when the financial transactions seem small. Officers are expected to read the Company's Insider Trading Code carefully, paying particular attention to the specific policies and the potential criminal and civil liability and/or disciplinary action for insider trading violations.

7) PROTECTION OF CONFIDENTIAL PROPRIETARY INFORMATION

Confidential proprietary information generated and gathered in our business is a valuable asset. Protecting this information plays a vital role in our continued growth and ability to compete, and all proprietary information should be maintained in strict confidence, except when disclosure is authorised by the Company or required by law. This obligation also extends to confidential information of third parties, which the Company has rightfully received under Non-Disclosure Agreements.

Proprietary information includes all non-public information that might be useful to competitors or that could be harmful to the Company or its customers if disclosed. Unauthorised use or distribution of proprietary information violates the Company's policy and could be illegal. Such use or distribution could expose the Company to legal problems. Hence, Officers dealing with such matters have to be extremely vigilant and careful.

Officers are also prohibited from transferring proprietary information to personal drives or email ids.[®]

Any instance of leakage, loss, theft or destruction of any confidential proprietary information should be promptly reported to the Compliance Officer.[®]

[§] Inserted w.e.f. February 12, 2020
[®] inserted w.e.f. 12.02.2020

8) ACCURACY OF BUSINESS RECORDS

Honest and accurate recording of information is extremely important. Investors count on the Company to provide accurate information about its affiliates and to make responsible business decisions based on reliable records. Appropriate members of management must properly authorize all payments and transactions. All financial books, records and accounts must be correctly maintained to accurately reflect transactions and events, and conform both to generally accepted accounting principles and to the Company's system of internal controls. Undisclosed or unrecorded funds or assets are not allowed. No entry may be made that intentionally hides or disguises the true nature of any transaction.

Almost all business records may become subject to public disclosure in the course of litigation or governmental investigations. Records are also often obtained by outside parties or the media. Officers should therefore attempt to be as clear, concise, truthful and accurate as possible while disseminating any information. Avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory characterizations of people and their motives.

9) PAYMENT PRACTICES

a) Accounting Practices:

The Company's responsibilities to its stockholders and the investing public require that all transactions be fully and accurately recorded in the Company's books and records in compliance with all applicable laws. False or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation and approval are strictly prohibited and violate Company policy and the law. Any willful material misrepresentation of and/or misinformation of the financial accounts and reports shall be regarded as a violation of the Code apart from inviting appropriate civil or criminal action under the relevant laws.

b) Political Contributions

The Company reserves the right to communicate its position on important issues to elected representatives and other government officials. It is the Company's policy to comply fully with all central, local, state, federal, foreign and other applicable laws, rules and regulations regarding political contributions. The Company's funds or assets must not be used for, or be contributed to, political campaigns or political practices under any circumstances without the prior approval of the Board of Directors.

c) Prohibition of Inducements

Under no circumstances may any officer make payment, promises to pay, or issue authorization to pay any money, gift, or anything of value to customers, vendors, consultants, government officials, etc. that is perceived as intended, directly or indirectly, to improperly induce any business decision, any act or

failure to act, any commitment of fraud, or opportunity for the commission of any fraud.#

Officers are expected to be aware of and follow anti- corruption and anti-bribery laws including but not limited to Foreign Corrupt Practices Act of 1977 (FCPA), United Kingdom Bribery Act 2010 (UKBA), Prevention of Corruption Act, 1988, etc. which prohibit bribery to public and private officials. @

%10) HUMAN RIGHTS

The Company recognizes the role of business enterprises as organs of society, required to respect human rights. The Company seeks to protect the human rights of all stakeholders impacted by its business, if any. Wherever it is observed that the Company is causing, contributing or otherwise linked to adverse human rights impacts, appropriate actions shall be taken for its prevention, mitigation and, where appropriate, remediation.

The Company also supports freedom of association and right to collective bargaining by its employees. The Company believes in creating equal opportunity workplace for them. The Company is against any form of forced or compulsory labour or child labour.

11) HARASSMENT AND DISCRIMINATION FREE WORKPLACE @

The Company is committed to maintaining a workplace where each employee's personal dignity is respected and protected from offensive or threatening or violent behavior. The Company believes that everyone has the right to work in an environment that is free from intimidation, harassment (including sexual harassment) and abuse.

The Company understands that harassment and abuse undermines the integrity of employment relationships and can cause serious harm to the productivity, efficiency and a harmonious workplace. For these reasons, the Company does not tolerate verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment.

The Company does not tolerate-

- Threatening remarks, obscene phone calls, stalking or other form of harassment
- causing physical injury to another
- appraisal bias or favoritism
- intentionally damaging someone else's property or acting aggressively in a manner that causes someone to fear injury

amended w.e.f. 12.02.2020

@ inserted w.e.f. 12.02.2020

% inserted w.e.f. October 29, 2021

- threatening, intimidating or coercing other employees on or off the premises at any time, for any purpose
- carrying weapons in the workplace
- discrimination on the basis of race, colour, religion, disability, gender, national origin, age, etc.

If any employee becomes aware of conduct relating to sexual harassment, they must raise a concern with the Prevention of Sexual Harassment Internal Complaints Committee formed by the Company under the Prevention of Sexual Harassment at Workplace Act, 2013.

12) COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

- a) Officers shall comply with all applicable laws, rules, and regulations.
- b) Officer who is unfamiliar or uncertain about the legal rules involving Company business conducted by him/her should consult the Compliance Officer before taking any action that may jeopardize the interest of the Company or that individual.
- c) The Company shall contribute to public finances by timely and complete payment of all applicable taxes in accordance with laws and regulations governing such payments.%

%13) ADVOCACY POSITIONS

Officers shall, when engaging in influencing public and regulatory policy, do so in a manner that is responsible and transparent. In case of matters having industry or broader implications and to the extent possible, policy advocacy shall be undertaken through trade and industry chambers and associations. The Company's policy advocacy positions should promote fair competition and respect for human rights.

14) DUTIES OF DIRECTORS

All the Directors shall comply with provisions of Section 166 of the Companies Act, 2013 which lays down duties of Directors.

% inserted w.e.f. October 29, 2021

Further, Code for Independent Director as specified under Clause III of Schedule IV of the Companies Act, 2013 also lays down certain duties of Independent Directors. The Independent Directors shall comply with the same.

The aforesaid provisions of Companies Act, 2013 are enclosed as Annexure I to this Code.

C. COMPLIANCE WITH THE CODE

All Officers are expected to comply with all the provisions of this Code. It is important for every officer to adhere to the principles expressed in this Code.

- a) Every Officer shall make annual declaration (in the format enclosed as **Annexure 'B'** by 30th April every year) affirming compliance with the Code to the Managing Director through the Compliance Officer. The Managing Director shall in turn make a declaration affirming compliance with the Code by the Officers including himself in the Company's Annual Report.^{#^}
- b) Members of Senior Management shall make annual disclosures (in the format enclosed as **Annexure 'C'** by 30th April every year) to the Board of Directors relating to all material, financial and commercial transactions (even though prior approval was obtained while entering such transaction), where they have personal interest that may have a potential conflict with the interest of the Company at large.^{@^}

Explanation - For the purpose of these disclosures, conflict of interest shall relate to dealing in the securities of the Company, commercial dealings with bodies, which have shareholding of Senior Management and their relatives, friends, batchmates, etc.[@]

[#] amended w.e.f. 12.02.2020
[@] inserted w.e.f. 12.02.2020
[^] amended on 29.10.2020

- c) Whole Time Directors and members of Senior Management shall make annual disclosure (in the format enclosed as **Annexure 'D'** by 30th April every year) of any kind of commercial / financial transactions or relationships which their relatives may have with the competitors of the Company or its group entities or employees of such competitors.[^]
- d) For the purpose of this Code, the term 'relative' shall include Members of HUF, Spouse, Father (including step-father), Mother (including step- mother), Son (including step-son), Son's wife, Daughter ((including step-daughter), Daughter's husband, Brother (including step-brother), Sister (including step-sister).[^]

The Compliance Officer shall be responsible for the proper implementation of the Code.

D. VIOLATION OF THE CODE

- a) The Code will be strictly enforced and violations will be dealt with immediately, including subjecting persons to corrective and/or disciplinary action. Disciplinary action by the Company may include wage freeze, suspension, termination, recovery, etc.[#]
- b) Violations of laws, regulations, rules and regulatory orders will subject the Officers to individual criminal or civil liability, apart from disciplinary action by the Company.
- c) Such individual violations may also subject the company to civil or criminal liability or the loss of business. The Company shall have the right to claim damages from the violating Officer(s).
- d) The corrective and/or disciplinary action under this Code shall be determined:
 - i. in case of violation by any member of the Board, by the Board of Directors.
 - ii. in case of violation by any member of Senior Management, by the Managing Director of the Company.
- e) If any Officer who knows of or suspects of a violation of applicable laws, rules or regulations or this Code of conduct, he/she must immediately report the same in accordance with the Whistle Blower Policy of the Company. Such reports shall be investigated as per the Whistle Blower Policy of the Company, the provisions of which shall mutatis mutandis apply.[#]
- f) The Company may also investigate such suspected violations suo moto as per the process prescribed under the Whistle Blower Policy of the Company.[@]

[#] amended w.e.f. 12.02.2020

[@] inserted w.e.f. 12.02.2020

[^] inserted / shifted on 29.10.2020

g) The Company recognizes that resolving such problems or concerns will advance the overall interests of the Company that will help to safeguard the Company's assets, financial integrity and reputation.

E. REVIEW OF THE CODE

The adequacy of the Code and its working shall be reviewed from time to time by the Board of Directors of the Company, as they deem fit.

F. WAIVERS AND AMENDMENTS

This Code is subject to continuous review and updation in line with any changes in law, changes in company's philosophy, vision, business plans or otherwise as may be deemed necessary by the Board.

Any waivers (including any implicit waivers) of the provisions in this Code for any Officer other than Managing Director, will be granted by the Managing Director and in case of the Managing Director it will be granted by the Board of Directors.

Amendments to this Code must be approved by the Board of Directors

EXTRACTS OF THE RELEVANT PROVISIONS OF THE COMPANIES ACT, 2013

SECTION 166 – DUTIES OF DIRECTORS

- (1) Subject to the provisions of this Act, a director of a company shall act in accordance with the articles of the company.
- (2) A director of a company shall act in good faith in order to promote the objects of the company for the benefit of its members as a whole, and in the best interests of the company, its employees, the shareholders, the community and for the protection of environment.
- (3) A director of a company shall exercise his duties with due and reasonable care, skill and diligence and shall exercise independent judgment.
- (4) A director of a company shall not involve in a situation in which he may have a direct or indirect interest that conflicts, or possibly may conflict, with the interest of the company.
- (5) A director of a company shall not achieve or attempt to achieve any undue gain or advantage either to himself or to his relatives, partners, or associates and if such director is found guilty of making any undue gain, he shall be liable to pay an amount equal to that gain to the company.
- (6) A director of a company shall not assign his office and any assignment so made shall be void.
- (7) If a director of the company contravenes the provisions of this section such director shall be punishable with fine which shall not be less than one lakh rupees but which may extend to five lakh rupees.

CLAUSE III OF SCHEDULE IV OF THE COMPANIES ACT, 2013 - CODE FOR INDEPENDENT DIRECTORS

III. Duties:

The independent directors shall—

- (1) undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company;
- (2) seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the company;
- (3) strive to attend all meetings of the Board of Directors and of the Board committees of which he is a member;
- (4) participate constructively and actively in the committees of the Board in which they are chairpersons or members;
- (5) strive to attend the general meetings of the company;
- (6) where they have concerns about the running of the company or a proposed action, ensure that these are addressed by the Board and, to the extent that they are not resolved, insist that their concerns are recorded in the minutes of the Board meeting;
- (7) keep themselves well informed about the company and the external environment in which it operates;
- (8) not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board;
- (9) pay sufficient attention and ensure that adequate deliberations are held before approving related party transactions and assure themselves that the same are in the interest of the company;
- (10) ascertain and ensure that the company has an adequate and functional vigil mechanism and to ensure that the interests of a person who uses such mechanism are not prejudicially affected on account of such use;
- (11) report concerns about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct or ethics policy;

- (12) acting within his authority, assist in protecting the legitimate interests of the company, shareholders and its employees;
- (13) not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board or required by law.

Annexure B

Date: _____

The Company Secretary
The Great Eastern Shipping Company Limited
Mumbai.

Dear Sir,

I hereby affirm my compliance with the Code of Business Conduct and Ethics for the Board of Directors and Members of Senior Management for the year ended 31st March _____.

Signature: _____

Name:

Designation:

Annexure C

Date: _____

The Board of Directors
The Great Eastern Shipping Co. Ltd.
Mumbai.

Dear Sirs,

I give herein below the information relating to all material financial and commercial transactions during Financial Year _____ wherein I have personal interest that may have a potential conflict with the interest of the Company at large.

Sr. No.	Nature of Financial / Commercial Transaction	Date of Transaction	Amount involved (Rs.)	Entered into with (name)

Signature: _____

Name:

Designation:

Annexure D

Date: _____

The Company Secretary
The Great Eastern Shipping Company Limited
Mumbai

Dear Sirs,

I give herein below the information relating to all commercial / financial transactions or relationships which my relatives have with the competitors of the Company or its group entities or employees of such competitors during Financial Year _____:

Sr. No.	Name of the relative	Entered into with (name)	Nature of Financial / Commercial Transaction	Date of Transaction	Amount involved (Rs.)	Any other relevant information	Date of approval by the Compliance Officer

Signature: _____

Name:

Designation:

Annexure E

Date: _____

The Company Secretary
The Great Eastern Shipping Company Limited
Mumbai

Dear Sirs,

I give herein below the information relating to all commercial / financial transactions or relationships which I had with the competitors of the Company or its group entities or employees of such competitors on November 24, 2020:

Sr. No.	Name of the relative	Entered into with (name)	Nature of Financial / Commercial Transaction	Date of Transaction	Amount involved (Rs.)	Any other relevant information

The aforesaid transaction(s) have been terminated w.e.f. _____.

Signature: _____

Name:

Designation:

Annexure F (Part 1 of 3)

Date: _____

The Company Secretary
The Great Eastern Shipping Company Limited
Mumbai

Dear Sir,

I give herein below the information relating to the commercial / financial transactions or relationships which my relatives have / may have with the competitors of the Company or its group entities or employees of such competitors:

Sr. No.	Name of the relative	Entered into with (name)	Nature of Financial / Commercial Transaction	Date of Transaction	Amount involved (Rs.)	Any other relevant information

You are requested to approve the same.

Signature: _____

Name:

Designation:

Annexure F (Part 2 of 3)

Date: _____

To

Name:

Designation:

Dear Sir / Madam,

With reference to your aforesaid application, we hereby inform you that the aforesaid transaction(s) are _____ (approved / not approved).

Remarks (if any) : _____

Signature: _____

Company Secretary

The Great Eastern Shipping Company Limited

Annexure F (Part 3 of 3)

Date: _____

To

The Company Secretary
The Great Eastern Shipping Company Limited
Mumbai

Dear Sir,

With reference to your aforesaid disapproval, I hereby inform you that the aforesaid transaction(s) have been terminated on _____.

Remarks (if any) : _____

Signature: _____

Name:

Designation: