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CONTENTS

Page 3

CORPORATE STORY

Page 4

FEATURE STORY

Page 5-6

OUR SUCCESS

Page 9-10

OUT & ABOUT

Page 11

OUR DEVELOPMENT

Page 12

OUR HISTORY

Page 13

SEFTI KONA

Page 14

COMPUTER SERVICES DIVISION KONA

Page 15

WHISTLE BLOWING POLICY



COVER PHOTO: TPS, CONSORT AND PACTOW DONATE TO THE HANUABADA FIRE APPEAL

COMMITTEE ON BEHALF OF STEAMSHIPS



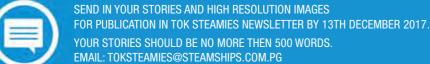












CORPORATE NEWS

EAST WEST COMMENCES NEW KIMBE CONTRACT

On the 7th August East West Transport commenced its newest contract in Kimbe, West New Britain, contracting to Puma Energy. Over a three year contract East West Transport will deliver 90 million liters in and around the Kimbe region.

The operations will consist of 5 vehicles, 3 rigid tankers and 2 semi-trailer tankers driven by a dedicated team of 6 who will provide a reliable and compliant delivery service. East West Transport currently delivers for Puma in Port Moresby, Lae, Wewak, Madang, Rabaul and Kavieng with Alotau added early in 2017.

NZDF TAKE OFF WITH EAST WEST

On the 23rd August, East West Transport assisted the New Zealand Defence Force deployment from Jackson International Airport to Goldie Barracks in Port Moresby for a 3 week exercise with the PNG Defence Force.

Services provided included the transportation of cargo and personnel, arranging reefer units for food storage, shower units, portaloo's and portable water. The approach shows a flexibility towards the needs of the customer by providing a one stop shop. EWT will be assisting the NZDF at the end of the exercise.

Below; EWT Truck filling up for another delivery in Kimbe.





CORPORATE NEWS

LAGA MAINTAINS STRONG GROWTH IN 2017 DESPITE ECONOMIC HEADWINDS ACROSS PNG







Above: The famous Gala Ice Cream production at the Ice Cream Plant in Lae. Left: Laga Staff doing quality checks on bottled water.

Everyone is aware that the consumer market in PNG has been very challenging for the past few years and is unlikely to improve in the short term. Laga is pleased to report that despite this, the business has continued to lift sales throughout 2017. Ice cream, cooking oil, specialty lines, water and Lagastik sales

"we are now well on our way to re-establishing Laga Industries as PNG's premier consumer foods business"

are all up strongly on 2016 levels which is in stark contrast to most of our competitors. The macro-economic prospects for 2018 look similar to this year with Government spending remaining tight and it is now expected that most of the major resource projects may have delayed starting dates in late 2018.

Laga is hopeful that consumer confidence will stay buoyant until the economy shows signs of improvement.

Accordingly, the first eight months of 2017 have been quite pleasing for the Laga business. Despite strong competition across all the business sectors within which we operate, Laga has continued to make steady improvements by becoming more efficient thus decreasing costs whilst increasing profitability. The improved result is also due to improved operational performance which has resulted in increased product availability and more efficient distribution. We still have a long way to go to achieve the commercial return expected by our shareholders however, we are now well on our way to re-establishing Laga Industries as PNG's premier consumer foods business. Our mission statement, "The Laga Way" is attached at end of this newsletter as a reminder of our mission and values.

FEATURE STORY

THE MANY FACES OF STEAMSHIPS: RACHAEL EZEKIEL

One more year before Steamships celebrates a century of operating in Papua New Guinea. Steamships has been a witness to Papua New Guinea developing into a vibrate country from the arrival of Sydney Fitch in 1919. Steamships stuck it out through the World War and the good and the tough times. The Company is fifty seven years older than Papua New Guinea herself.

Much can be learnt from Steamships archive of photos. The pictures take us through what Port Moresby was like in the early years to the present. Indeed it has being a great journey and continues to be one for the many Papua New Guineans employed by Steamships.

Who would have thought that almost 100 years from now, the Company would have female tug masters, truck drivers, lawyers, accountants, crane operators and executive managers across the divisions?

The story of Steamships success lies in the development of its staff and desire to create a culture based on hard work, determination and vision. Throughout the years the Company has seen many Papua New Guineans come through its doors wanting to be trained, mentored and developed into capable and confident operators and managers.

Since 1975, past and present Steamships employees reminisce about their experience working for the Company through a walk down memory lane. Many stories have been told by employees whose grandparents, parents, brothers and sisters worked with Steamships and Tok Steamies has the opportunity to bring these stories to life with the inclusion of Staff Features in each publication.

Amongst these are the stories of Jacob Thomas and Rachael Ezekiel. Their experiences span a time difference



of thirty eight years. There are many difference in terms of their experience, divisions they have worked in and the provinces they come from thus they represent Steamship's diversity.

Rachael Ezekiel was born in Markham District in Morobe Province in 1990, fifteen years after Papua New Guinea gained Independence and seventy two years since Steamships commenced operations in the country.

Rachael grew up in Morobe. Being the only child, she said, gave her the opportunity to attend school aged six. "I think if I had male siblings I wouldn't have that opportunity. Having parents who are subsistence farmers in a patrilineal society, priority would have been given to the male child, but I am blessed that my parents sent me to school."

A Dux student at the Wankun Primary school, Rachael moved on to Markham Valley High school which is a boarding school further away from her village. Rachael successfully completed Grade 10 and was selected to go to Grace Memorial Secondary School in Wau. Although Wau was a challenging place to study in, Rachael gives credit to God for successfully completing Grade 12 and landing a placing at Pacific Adventist University (PAU).

Rachael says that (PAU) was an expensive school but her father was

"Be courageous like the eagle, flying is more graceful and fun in the storm."

optimistic about sending his only child to further her education.

"PAU is a very expensive school but my father said "getting an education is your problem, getting the money for your school fees is my problem". I successfully completed my studies because of his unwavering faith in God."

Much to Rachael's surprise a number of scholarships were offered to her including the Morobe Provincial Government and Barrick Kainantu. Father and daughter arrived in Port Moresby in 2009 in preparation for registration at the PAU. It was nerve wrecking for her because this was her first visit to Port Moresby which is many miles from home and family.

Sadly, during second semester of Rachael's first year in Uni, her father passed away. "I can remember that day well. It was on 27 October 2009, two weeks before my final semester exams that I was told my dad passed. My father is like a fisherman's rod and I was the string. With him gone, I had to try to navigate basically everything on my own".

Rachel graduated with a Degree in Business Accounting and Management in 2015 after taking almost two years off school.

Being accepted in the Steamships
Graduate Management Program in 2016
was a bonus for her. She had heard about
Steamships and the diverse portfolio of
the business. "I am blessed to work for
a company within a diverse industry."
Rachel says that through the Steamships
Graduate Development Program she
was able to work with Consort in the HR
Department in Lae and eventually move
back to Port Moresby to assist Human
Resources at the Corporate Office.

Rachel says that life continues to provide challenges and opportunities for her. She says "Be courageous like the eagle, flying is more graceful and fun in the storm."

OUR SUCCESS







Top left: Jacob in Popondetta during 1976. Left: Jacob and Mr Marr, the pioneer Manager of Madang Port Services in 1976. Above: Jacob and his family outside Madang Port Services during Independence 2017.

THE MANY FACES OF STEAMSHIPS: JACOB THOMAS

Jacob Thomas, like Rachel, believes in hard work and determination. Jacob was born in 1958 in Pimbumeri in East Sepik Province, sixteen years before Papua New Guinea gained Independence in 1975 and forty years since Steamships started operations in the country.

Jacob completed Primary School in East Sepik in 1968 and continued his education at the Banyik Vocational School in his home province.

As the country entered into the era of Independence Jacob arrived in Popondetta where he attended Popondetta Vocational School until

1977. Jacob says the meaning of Independence to him during the early days was not clear. To Jacob the meaning was "mi pela yet lukautim kantri (we govern our own country). There were lots of activities on the day of Independence, a lot of sing sing groups". Jacob is one of the longest serving staff members with Port Services based in Madang. In the early years the company was known as Rabaul Stevedoring when in 1978, it became Madang Port Services. In 1978 Jacob moved to Madang and completed vocational training and landed his first job with WDNA Wheels which later became known as British American Tobacco (BAT) as the Supervisor for Tobacco Marking.

By October in the same year, Jacob thought to himself that a change of career away from tobacco making was his destiny and he took up a role at the office of the Madang Port Service as an administration and payroll clerk and stayed in the role for four years.

In the years that followed, Jacob married and had five children and continued his role with Madang Port Services until he was offered another position as the Transport Supervisor in 1982.

Jacob has been with Port Services and based in Madang for 39 years and has grand children now. He is proud of his long service and dedicates his success to his wife and family. Jacob "I am still of energy," he says and he praises his Manager Motu Lohia. Jacob says that a lot has changed in Madang since 1978. For instance the wharf in Madang has expanded a bit and now the cargo comes in containers properly packed unlike 30 years back when there was a lot of work to be done. It was very physical and manual. "Now the machines do most of the work for us".

Jacob says that if he was given the opportunity to talk to young people and the staff he would advise them to "put your head down and commit to your work, and let God be your umbrella".

OUR SUCCESS

STEAMSHIPS CELEBRATES 27 YEARS OF RUGBY



Coral Sea Pirates lost 12 -15 to the TPS Truckies after the Truckies sank two more tries in the final seconds, marking their first win record in the Steamships Managing Director's Cup last Saturday 7th October at the Bava Park.

The Pirates representing the Hotel's Division were gunning for another win after its last win in 2012 and were all pumped for the finals however EWT Truckies were not prepared to come in as second best.

The Steamships Rugby 7s competition were without the 2016 champions KPS Dockers who were unable to fly out to Port Moresby from Kavieng to defend their title. All hail to their colleagues from the same division Transport and Port Services who defended the might of their division in another consecutive win at the Bava Park.

The women's team saw EWT Truckies taking out the award in the Managing Director's Cup for Rugby Touch.

The Transport and Port Services division of Steamships took out the Managing Directors Cup for both Rugby 7s and Touch Cups.

The Steamships annual Rugby 7s is the oldest sport played in the company reaching its 27th year since its inception in 1990.

The game is a big deal for Steamships and for those past and present players it remains one of the best tournaments played each year. The sport draws players from the six divisions and its partners in shipping to trucks, hotels, property, commercial and tugs.

In 2016 the coveted Managing Director's Cup was played in Lae for the first time and Port Moresby with 32 teams and over 300 participates including both men and women's team.

A similar match was played in Lae Scrum Oval for the division's operating outside of Port Moresby. A major upset in Lae saw Highlander Eagles representing Coral Sea Hotel's being defeated and missing out on the Grand Final. Riback, a

Above: Riback Crusaders and Consort Magic pose with the rest of the teams that participated at the Rugby 7s and Touch competition at Scrum Oval Lae. Both teams took out the Managing Director's Cup respectively.



Port Moresby Rugby 7s and Touch winners TPS Truckies and EWT Truckies proudly standing with General Manager Gordon McMaster and MD Peter Langslow at Bava Park.

subsidiary of Steamships took out the Managing Directors Cup upsetting Consort Express 26-5 who were determined to win the Cup

The women's team in Lae saw Consort Express taking out the Managing Directors Cup 1-0 beating Laga Industries.

Tournament Director Paul Joseph organized the smooth process of the game from start to finish with Facility Managers Robin Tarere of Scrum Oval and Paul Isorua of Bava Park and their team assisting on site to provide medical support and ensure the grounds were maintained throughout the day. The Right Connections led by Stephen Dawanincura organized the competitions in Lae and Port Moresby.

OUT & ABOUT

CONSORT SPONSORS THE TAWALI PASANA EXPEDITION: THE WORLD'S FIRST CIRCUMNAVIGATION OF THE ISLAND OF NEW GUINEA IN A TRADITIONAL SAILING CANOE





Thor and his Papua New Guinean crew set sail from Milne Bay.

Consort team at Yacht Club with Thor and his crew.

The adventure was launched on the 30th of August 2016, from the Tawali Resort in Milne Bay, Papua New Guinea. The wind and currents will favour a counter clockwise route and bring the canoe around Indonesian West Papua before crossing back to PNG, just before the typhoon season sets in.

Consort is the Silver sponsor to the
Danish Adventurer Thor F. Jensen and
three Papua New Guinean
sailors who are completing
the first ever recorded
circumnavigation of New
Guinea by a traditional sailing
canoe. The vessel is called the

Tawali Pasana. Sanakoli and

Justin John are some of Milne

Bay's best sailors and they

will teach Thor to live and sail like the Melanesians have done for centuries.

The entire experience is being shared live on social media: Facebook, Twitter, Instagram.

Thor and the crew will complete the circumnavigation by relying on resources available locally. This way, they not only gain a deeper understanding of how life is lived on the island of New Guinea but



also demonstrating that you can achieve great dreams for few means – as long as your project is driven by perseverance and passion.

The completion of the voyage is about 600 kilometers. This will be the World's First Circumnavigation of the Island of New Guinea in a Traditional Sailing Canoe. Thor, Sanakoli & Justin departed Port Moresby on the 24th September

2017 for the final leg of the journey for Tawali and hope to complete the circle in time for the celebrations of the national canoe festival in Alotau.

Consort was a Silver Sponsor for K10,000

Story provided by Nelly Danaya of Consort..

OUT & ABOUT



Computer Services Division celebrating Independence Day pose outside their office for a group photo.



Steamships staff preparing for lunch as part of their Independence celebrations.



Pacific Towing Staff explaining the products on display at the Naval Base in Port Moresby during World Maritime Day exhibition.



Chelsea and Rachael from Steamships attending the launch of Cheshire Disability Services 2016 Strategic Plan. Steamships donates annually to Cheshire's activities.



Marshalls at the 2017 Hiri Moale Festival in Port Moresby in September. Transport and Port Services donated T-Shirts for the Marshalls who were responsible for maintain order during the two days festival.



Laga team selling ice cream at the Rugby 7s match in Lae at the Scrum Oval.



OUT AND ABOUT



Consort, Pactow and TPS staff doing a cheque presentation of K20,000 to the Hanuabada Fire Appeal Committee. The fire in September destroyed 18 houses displacing more families. Fortunately no one was hurt during the fire.



Gala at Harbourside!! Chew and Hotel's staff enjoying ice cream at the Gala Parlor at HarboursideWest.



Steamships at the Gatway Children's Fund High Tea in Port Moresby. Steamships donated K118,400.



Steamships Corporate Rugby Touch team at Bava Park on Saturday 8th October.



STCVa'a Team during training on Saturday.



 ${\it Consort Women's team in Pom\ having\ a\ final\ chat\ before\ their\ game.}$



EWT Truckies win the Managing Directors Cup at the Lae Mixed Netball Competition..png



Steamships Attending the PinkTober Lunch at the PomYacht Club. Steamships supports the PNG Cancer Foundation through donations.

OUR DEVELOPMENT



PNG Toastmasters (1) - L-R; Ms Okera Amini, Ms Monica Toisenegila, Mrs Molly O'Rourke (MPIP PNG Chairperson), potential contestant Esther Aiga, Miss Queen Emma Chocolates Niawali Twain, Miss IBSU Rosemary Pawih, potential contestant Rachel Ezekiel, and Jelena Uraru (MPIP PNG Committee Member)

PNG TOASTMASTERS ASSIST MPIPP

Monica Toisenegila (second from left) and Rachael Ezekiel (second from right) were delighted to be a part of the Toastmasters Club speech craft training held for the Miss Pacific Island Pageant PNG entrants in September.

Monica is the PNG Division Toastmaster's Director and a member of the Steamies Toastmaster's Club. The Miss Pacific Islands Pageant PNG is a not-for-profit organization which holds its annual pageant in order to crown a "cultural ambassador." It aims to select a girl who is the embodiment of the modern Papua New Guinean women, both educated and culturally aware. It also selects a girl who represents the best that PNG has to offer, with the ability to showcase the unique diversity of PNG.

The MPIP PNG is more than just a beauty pageant. It raises funds for a scholarship fund which assists young Papua New Guinean women to complete or continue their educations in tertiary institutions across the country. Since its inception in 2011, the pageant has raised over K600, 000.00 and assisted over 193 young women pay for their tuition fees.

As part of its annual program, the contestants for 2017 recently completed a public speaking course through the Toastmasters curriculum for six weeks. Transport and Port Services (TPS)

of Steamships Limited have donated their board room as a venue. Due to its not-for-profit status, the MPIP PNG is very appreciative of corporate houses, such as TPS, which come on board to assist with the continuity of its program.

Mrs Molly O'Rouke, the Chairlady of the MPIP expressed her gratitude and appreciation to the General Manager of TPS, Mr Gordon McMaster and the company for their generosity and support. Through the donation of a free venue, the ladies have gone through a course which will further boost their self-confidence and allow them to be confident ambassadors of their country. Thank you Transport and Port Services for partnering with MPIP.



TPS Human Resource Manager (Left) at the Miss Pacific Island Pageant PNG funding raising in August this year. Monica was the Master of Ceremony.

OUR HISTORY



DONALD NEIL HARVEY: A LIFETIME OF SERVICE IN PNG

Donald Neil Harvey was born in Sydney, in 1928. He was educated at Canterbury Boys' High School, and in 1949 qualified as a certified accountant. Harvey joined Steamships on 29 September 1956.

In a 2005 interview Harvey recounted his recruitment. "A friend of mine said there was a good job going up there, with Steamships. I was interviewed in Sydney, and I took the job on the basis of a letter of appointment for one year. Port Moresby was so dynamic, there was something always happening, I just fell in love with the excitement of it".

Arriving in Port Moresby as the internal auditor, Harvey soon worked his way into the position of Company Accountant, a vital part of the senior management team. Quite early in his career, he was also given the responsibility for the Hotels Division.

The first year of Independence saw Steamships Trading Company return record trading and profits, the highest since 1966. It was a fine time for then Managing Director, Del Underwood, to hand down the direction of Steamships Trading Company. The Board appointed D.N. Harvey to replace Del Underwood at the end of 1976.

Don Harvey was to serve as Chairman and Managing Director of Steamships Trading Company for seven eventful years - from December 1976, to December 1983 - and then continued as a Director and non- executive Chairman, until 1986. During his tenure he negotiated a move away from plantation ownership, increased the Steamships hotel footprint, and oversaw the reconstruction of records and the relocation of the Steamships Head Office to the Machinery Division warehouse at the bottom of Hunter Street, following the devastating Main Store fire of 1977.



Top: Steamships Head office burns down in 1977

He was the last of the Steamships chief executive officers to combine the two top positions, and served the Company in both the pre and post-Independence period. His time in office can be regarded as the swan- song of the traditional, precomputer, hands-on style of Steamships management, begun so long before by Captain Algernon Sydney Fitch, the founder of Steamships.

Don Harvey served on many community and Government organisations during his years with Steamships. He was President of the Employers' Federation from 1980 to 1983; a Member of the National Development Forum, and of the PNG Labour Advisory Council; Chairman of the PNG Tourist Board from 1968 to 1975; Chairman of the PNG Tourism

Advisory Council from 1975 to 1982; and also served on a number of special Government committees from time to time. He was a Rotarian, an Apexian, and was President of the Papua Club in 1968. He was appointed an Honorary Life Member of the Papua Club in 1979.

In the midst of a very hectic corporate and extra-curricular schedule Harvey also found time to raise three children with his wife, Mavis Shirley Mann, who he met in the late 1950's in Port Moresby. The Harvey's had three children, Stephen, Karen, and Dean, all born in Port Moresby during the 1960's.

The Board lost its elder statesman with the retirement of Don Harvey on 31 March, 2003. The loss of his knowledge and influence was keenly felt. The 2002 Annual Report notes, "There cannot be too much praise for the service he has delivered to Steamships, which spans more than half the life of the Company."

Donald Neil Harvey passed away on Monday 25th September, 2017.

SEFTI KONA

LAGA CELEBRATES TWO YEARS LTI-FREE AND RECOGNIZES LONG SERVING EMPLOYEES

On Friday 6 October, Laga employees at all sites around the nation stopped to recognize an important milestone for the business; two years without a Lost-Time-Injury (LTI). As part of the Steamships Group, Laga is putting a lot of effort towards achieving its goal of Zero Harm to all stakeholders. The 2 Year LTI-Free status at Laga is a testament to the efforts of all staff across the country and has only been achieved by individual team-members taking personal responsibility for their own safety and those of the work-mates. The Laga teams enjoyed cakes and ice cream as part of the celebration.

At Laga's Lae Headquarters and manufacturing site, the business also took the opportunity to recognize the contribution of various employees. General Manager, Gerard O'Brien, made presentations to staff who had achieved a minimum of 15 years' service with the business.

"Such long service to one organization is a rarity in the modern age and it is important that Laga and its staff takes the time to recognize these nine dedicated individuals for their loyalty, commitment and perseverance" Mr O'Brien said.

Five of the staff, Pauline Peleli, Zure Asaure, Amos Suma, John Sapa, and Dixon Boseng were recognized with gifts for nineteen (19) years service. Two others; Dallex Bayang and Alice Dongbiang have completed seventeen (17) years of loyal service, while an another two, Margaret Amini and Edward Nolim have completed sixteen (16) years. Laga Operations Manager, Neil O'Bree, then made a heart-felt presentation to another long-serving employee who is retiring after reaching the age of 69, having worked at Laga for the last 11 years. Ripo Sogori has been employed across most of the Lae production lines



Neil O'Bree congratulating Ripo Sogori on his retirement.

during his career and has recently retired as a machine operator.

Laga has also been very active with its Community Engagement programs. In September, a group of 30 Laga employees volunteered to help out at the Pikinini Protection Day organized by the Royal PNG Constabulary (RPNGC) and the Australian Federal Police (AFP). Representatives of both organizations attended the function to award certificates to the Company and to the employees involved as a token of appreciation for Laga's participation. Head of the AFP in Lae, Inspector Jim Edwards said that "the contribution of the Laga team was invaluable and the Gala tent was by far the most popular during the event in which over 500 pikininis were treated to a day out." Gerard O'Brien thanked both Police Forces for organizing the event and expressed his pride at the way in which our staff had worked tirelessly during the day. "It is not only important for our staff to give back to the community but it is important for the Gala brand to be associated with such an unequivocally good cause as Child Protection. We will be back next year" he added.



Australian Federal Police & Royal Papua New Guinea Constabulary representatives presenting certificates of appreciation to Laga employees.



Long Service employees from L-R Alice Dongbiang, Amos Suma, Pauline Peleli, Margaret Amini, Eddie Nolim, Zure Asaure, Ripo Sogori. Absent: John Sapa, Dixon Boseng, Dallex Bayang

COMPUTER SERVICES DIVISION KONA



This fully interactive module takes Steamships employees on a tour about CyberSecurity Awareness.

The training is divided into four modules. As you progress, each module has a set of questionnaires that will be asked, the end-users will be tested if they fully understood the training modules.

The First Module is about "Your Role". In this module, you will be presented with the threat landscapes and the methods used by cybercriminals to breach your device and get into your network. This module will show you how you play a major part in keeping Steamships secure.

The Second Module is about the Common Threats. In this module, you will learn about strategies and techniques hackers use to trick people. You will be presented with three real world hacks and takes you behind the scenes on how hackers commit these crimes.

The Third Module focuses on how to detect Red Flags and will show you how to spot possible dangers in an email. You will go through 7 areas in an email and will teach you how to detect Red Flags.

The Fourth Module is about the Danger Zone and teaches you how to identify six potential social engineering attacks and help you decide on how to avoid these social engineering attacks.

By the time you finish this Awareness Training program, you will be well equip with the knowledge and understanding on CyberSecurity.

What role you will play in protecting and securing not just yourself but also Steamships LTD.

WHISTLE BLOWING POLICY

BLOW THE WHISTLE ON BAD BEHAVIOR!

1.0 POLICY STATEMENT

The Steamships Group adheres to the highest standards of business ethics, conducting all its businesses with integrity, promotes fairness and respect among all employees.

2.0 OBJECTIVE OF THIS POLICY

The purpose of the Steamships Whistleblowing Policy is to provide guidelines for any individual (whistleblower) who wants to raise concern on unethical conduct, fraud, perceived wrongdoings or violation to any provisions of the Steamships Code of Conduct ("Improper Conduct"). This policy is a supplement to Clause 19 of the Code of Conduct.

3.0 APPLICATION OF THE POLICY

The policy applies to all employees of the Steamships Group (the Group) and related parties where Steamships has business dealings. All individuals are encouraged to be vigilant and raise a bona fide concern in good faith to the appropriate personnel without fear of losing their jobs, business dealings or becoming a victim of intimidation and harassment. The Group will maintain strict confidentiality of the reported matters.

4.0 STATEMENT OF SUPPORT TO WHISTLEBLOWERS

The Group is committed to the aims and objectives of this Policy where Whistleblowers are protected to come forward in good faith and on a proper basis to disclose unethical business conduct and other wrong doings ("improper conduct").

5.0 IMPROPER CONDUCT

For the purpose of this Policy, Improper Conduct is defined as:

 corrupt, fraudulent or other illegal conduct or activity;

- II. conduct that this contrary to, or a breach of, Steamships Codes and Policies;
- III. a substantial mismanagement of the Group's resources;
- IV. conduct involving substantial risk to public health or safety; or
- V. conduct involving substantial risk to the environment that would, if proven, constitute by the Group or its employee/s a criminal offence;
- VI. reasonable grounds for dismissing or dispensing with, or otherwise terminating, the services of a Steamships employee/s who was, or is, engaged in that conduct; or
- VII. reasonable grounds for disciplinary action.

6.0 WHISTLEBLOWING PROCEDURES

- 6.1 To report a genuine concern, the matters should be initially reported to the direct manager.
- 6.2 If the whistle blower is uncomfortable to report the matters through normal reporting procedures or no satisfactory actions are taken the matter must be escalated to the Steamships Internal Audit (STCIA).
- 6.3 STCIA will conduct initial assessment of the case.
- 6.4 If the disclosures are made in good faith, STCIA will gather information and undertake an appropriate investigation.
- 6.5 Recommendations on the outcome will be given to the appropriate senior management authority to address the matter.
- 6.6 This Policy is not designed to deal with general employment grievances and complaints.

Any report treated in accordance with this Policy must be for one of the Improper Conduct as outlined above. All general employment complaints or grievances will be forwarded to the respective divisional manager or GM Human Resources to address.

7.0 WHISTLEBLOWING CHANNELS

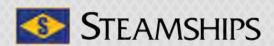
- 7.1 Individuals may report their concern through various channels:
- i. Via email at stcia@steamships.com.pg.
- ii. A text message can be sent to the dedicated Mobile Number 71004481.
- iii. Postal Address at Steamships Trading Company Limited, c/o Group Internal Auditor, P.O. 1, Port Moresby.



Are you aware of any unethical conduct, fraud, perceived wrongdoings, or violation of the Steamships Code of Conduct?

If so, then our Whistleblower policy, allows you to report any such incident, in the knowledge that it will be done so confidentially and that your identity will be protected at all times!

It's simple. Send a text to 71004481 or an e-mail to: stcia@steamships.com.pg and the matter will be appropriately dressed. You can mail it to; Steamships Trading Company Limited, c/o Group Internal Auditor, P.O. 1, Port Moresby.



Send us your stories and high resolution images for publication in Tok Steamies Newsletter by 13th December 2017.

Your stories should be no more then 500 words. Email: toksteamies@steamships.com.pg