

OVERSIGHT OF SERVICE PROVIDERS POLICY
SEACREST PETROLEO BERMUDA LIMITED

It is the Group's policy to conduct due diligence on critical third party service providers used by the Group prior to their engagement. The Group reviews the service provider's compliance with the terms of agreements in place and assesses the service provider's continued suitability and capacity to perform the activities being outsourced. The Group also determines whether the service provider maintains adequate physical and data security controls, transaction procedures, business continuity and IT contingency arrangements (including periodic testing), insurance coverage, and compliance with applicable laws and regulations. The Group understands that the ultimate compliance responsibility lies with the Group and cannot be delegated to the service provider. As used herein, "**Group**" means Seacrest Petroleo Bermuda Limited and its subsidiaries and affiliates, and "**Group Company**" means any of them.

Procedures

1. Prior to entering into a contract with a critical service provider, the Group will conduct a due diligence review including, if deemed necessary or advisable by the Group's Chief Compliance Officer (the "**CCO**"), an onsite visit.
2. All service provider relationships shall be memorialized in a written agreement that will be reviewed by the CCO. All such agreements shall include appropriate confidentiality provisions protecting the Group's confidential information in accordance with the Group's privacy policies, including confidential information about the Group's strategic partners and appropriate provisions requiring service providers to protect the security of personal information in accordance with the Group's privacy and data security policies.
3. Periodically the Group will conduct a due diligence review. The CCO will be responsible for the review, which shall include surveying Group personnel who interact with the critical service provider on a regular basis and reviewing any compliance violations or other errors attributable to the service provider.
4. Periodically, in the discretion of the CCO, the Group will request any critical service provider to complete the Third Party Service Provider Due Diligence Questionnaire attached hereto as Exhibit A.
5. If any concerns/issues arise during the course of the relationship, they should be escalated to senior management immediately.

ADOPTED: October 20, 2020

EXHIBIT A

Third Party Service Provider Due Diligence Questionnaire

Name of Service Provider:	
Date:	<input type="checkbox"/> Check If On-site Visit

1. Description of Services & Service Delivery Capability

- i) Please describe the services provided.
- ii) Has there been any material change in services provided since last year?
- iii) Identify the main locations where services are being provided.
- iv) Please provide current number of employees.

2. Qualifications & Background of Key Employees

- i) Are employees required to undergo a background check?
- ii) How many key employees are assigned to the accounts?
- iii) In the past year, has there been a change in key employees assigned to the accounts?
- iv) Please describe the professional experience of key employees assigned to the accounts (including # of years of experience).

3. Financial Status

- i) Is the company public or private?

ii) Please provide a copy of your most recent audited financials.

iii) Were there any material changes since last audit?

4. Technology Architecture/Business Continuity & Disaster Recovery

i) Please provide a brief summary regarding system security.

ii) Were there any system breaches over the past year?

iii) Were there any technology upgrades?

iv) Please provide a summary of your Business Continuity Plan and Disaster Recovery Plan.

v) Please describe your Business Continuity Plan and Disaster Recovery Plan testing procedures & any findings.

5. Internal Controls

i) Please provide a copy of the most recent SAS 70 report or equivalent (if applicable).

ii) Were there any material internal audit findings?

iii) What is your policy and controls regarding client confidentiality?

iv) Were there any changes to company policies and procedures on internal controls over the past year?

v) Please provide a copy of your current privacy policy.

6. Legal & Regulatory Compliance

- i) Please describe any conflicts of interest.

- ii) Were there any legal or regulatory issues over the past year?

7. Access to Information/Books & Records

- i) Please describe your ability to produce information and/or books and records regarding the client relationship.