

Anti-Money Laundering Policy

PURPOSE

International Seaways, Inc. (together with its subsidiaries, “INSW”, “we” or the “Company”) is committed to preventing Money Laundering (as defined below). The Company conducts its business in accordance with sound business ethics and principles and applicable anti-money laundering principles, laws and regulations, including, but not limited to, the Bank Secrecy Act, Financial Action Task Force Recommendations and the USA PATRIOT Act (“AML Laws”).

The purpose of the Anti-Money Laundering Policy (the “Policy” or “AML Policy”) is to memorialize the Company’s commitment to adhere to, comply with, and actively take steps to prevent any activity that directly or indirectly involves or facilitates Money Laundering and/or funding of illegal or terrorism-related activities in the conduct of its business worldwide.

SCOPE

This Policy applies to all Employees (as hereafter defined) performing duties for or on behalf of INSW whether or not directly employed by INSW and wherever located.

“Employees” mean officers, directors, representatives and all other workers performing duties on behalf of INSW, whether or not employed directly by INSW.

Where Employees act on behalf of INSW but are employed by third-party agencies or similar entities, this Policy has been made known to them and continues to apply. INSW will take appropriate steps to ensure that any such third-party organization maintains policies, practices and/or procedures that appropriately address the matters covered by this AML policy.

GUIDELINES

I. What is Money Laundering?

AML laws make it a crime for any person to engage knowingly (or to assist) in a financial transaction that involves the proceeds of specified crimes or illicit activities. Money Laundering is broadly defined as the attempt to conceal the origin and ownership of the proceeds of illegal activity and to disguise assets to make them appear legitimate.

In general, there are three stages to Money Laundering, which may comprise numerous transactions that could alert an organization of the risk of criminal activity. The Company's transaction with counterparties could implicate any of these three stages.

- Placement – the stage where cash first enters the financial system and is converted into monetary instruments, such as money orders or traveler's checks, or is deposited into accounts at financial institutions;
- Layering – the stage where funds are transferred or moved into other accounts or other financial institutions to further distance the money from its criminal origins; and
- Integration – the stage where funds are reintroduced into the economy in such a way that the source of the funds appears legitimate.

Money Laundering transactions need not involve cash and can involve any type of financial transaction, including check deposits, withdrawals or transfers or movement of funds, securities or other property. Moreover, Money Laundering can consist of either a single transaction or a pattern of transactions or complex activities.

II. Red Flags

The following is a non-exhaustive list of "red flag" examples which are indicative of potential Money Laundering:

- Any transactions where the basic details of the parties cannot be checked or verified;
- Payments that are made in currencies other than that specified in the invoice, contract or purchase order;
- Attempts to receive or make payments in cash or its equivalents, such as cashier cheques;
- Requests to make overpayments;
- Transactions that are made through unknown or unnecessary intermediaries or transactions that are accompanied by a request for secrecy; or
- Requesting to make or making any sizable in cash payments.

POLICY

No INSW Employee shall engage in a transaction that they know, or should reasonably suspect:

- Involves Money Laundering or the receipt, concealing, disguising, conversion and transfer of any money or other property derived from or intended to promote criminal activity or terrorism;
- Is designed to conceal, convert or disguise the nature, location, source, disposition, movement, or ownership of money or other property; or
- Is otherwise an attempt by a third party to engage in Money Laundering; if such a transaction would be prohibited by applicable AML laws.

Employees may not escape liability by being “Willfully Blind.” Willful Blindness occurs where a person, aware of red flags of wrongdoing, deliberately avoids confirming that wrongdoing.

INTERNAL CONTROLS

Employees of the Company undertake due diligence to assess the integrity and identity of prospective customers through processes such as KYC (know-your-customer), credit checks and background checks. Prospective customers are defined as any new entity that engages INSW to transport and/or lighter cargo.

Furthermore, Employees conduct sanctions checks of prospective customers by searching the entity through the Office of Foreign Assets Control sanctions list, the European Union sanctions list, the United Kingdom sanctions list and the United Nations Security Council Consolidated List to determine whether a prospective customer or its affiliates are included in any sanction list.

Any counterparty that the Company is considering entering into a significant transaction with (i.e. an asset sale or a merger and acquisition) also undergoes an extensive background check and KYC process.

Employees should refuse to accept funds from, or do business with, shell banks or customers whose funds any employee reasonably believes are derived from criminal activity or from a sanctioned source.

COMPLIANCE AND REPORTING

Any Employee who has knowledge or reason to suspect or believe that there has been, or will be, a violation of this Policy, is required to report such information to the Company’s Legal Department immediately.

Reports of noncompliance may also be made to the INSW Compliance Hotline anonymously at 1(855) 874-9549 or by using any of the other contact methods outlined in the Code of Business Conduct and Ethics.

No Employee shall be subject to any reprisal or adverse personnel action by reason of having made such a report in good faith.

If you have any other questions or are concerned about something that seems to be in conflict with the law, regulations, the Company Code of Business Conduct and Ethics or this Policy, you have several options:

- Inform your manager. Be as specific and detailed as possible so they understand the situation and your concerns;
- Contact the Legal Department; or
- Contact the INSW Employee Hotline tollfree anytime at 1 (855) 874-9549. All questions or concerns will be handled in a confidential manner as appropriate and allowed by law and will be investigated without retaliation.

INSW expects full cooperation from Employees in assisting law enforcement agencies in their efforts to prevent and prosecute money laundering. Violations of AML laws can result in criminal and civil liability for the Company and individuals, and any property or assets involved in such illegal activity are subject to forfeiture. Any Employee who violates this AML Policy or AML laws is subject to disciplinary action, up to and including termination.

Responsibility for the administration, interpretation, and ongoing compliance with this Policy rests with INSW. This Policy has been approved by the INSW Board of Directors, and this Policy shall be reviewed periodically by INSW to assess its continued appropriateness considering the market environment, regulatory expectations, and risk profile.

OTHER POLICIES WHICH MAY APPLY

The Anti-Money Laundering Policy should be considered along with other Company policies that may apply, including the Company's Code of Business Conduct and Ethics.

Certain policies are available on the Company's website at www.intlseas.com under the "Investor – Governance – Governance Documents" tab, and all of the Company's policies are available on the Company's intranet site or Workvivo site.

NOTE: This Policy is not intended to create any employment relationship or contractual rights in favor of the employee or the Company. INSW reserves the right to change the terms of this Policy at any time.