

Dear Agent,



In preparation for this port call, we would appreciate if you took time to review our Company's stand on anti-corruption.

We comply with the laws and regulations of countries in which we operate. We adhere to our standards of business conduct and deliver our assignment professionally and with integrity and fairness. Our company is a proud member of the Maritime Anti-Corruption Network (MACN).

MACN is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large. Established in 2011 by a small group of committed maritime companies, MACN has become one of the pre-eminent examples of collective action to tackle corruption. MACN member companies promote good corporate practice in the maritime industry for tackling bribes, facilitation payments and other forms of corruption.



MACN collaborates with key stakeholders, including governments and international organizations to identify and mitigate the root causes of corruption in the maritime industry.

With our MACN membership, our company has committed to implement MACN's seven anti-corruption principles which focus on promoting high ethical standards for the maritime industry.

Our company can be held liable for actions made on behalf of us by our third parties. We therefore ask you to adhere to our stand against corruption.

This means:

- We do not tolerate bribery or facilitation payments—no matter how small the amount. We will not offer, authorize or accept bribes, kickbacks or anything of value for the purpose of obtaining or retaining business or any other improper advantage.
- We understand that port agents and vessel owners are often asked for gifts when performing their duties. We do not provide (nor authorise others to provide) gifts, entertainment, vouchers, cash, cigarettes, alcohol or other gratuities to any third parties, in particular any government officials.
- Under no circumstances are invoices to be raised by, for, to or on behalf of our Company for charges not authorised.
- Threats to personnel following refusal to pay a bribe or facilitation payment will be reported to the relevant authorities. Any payments made or gifts given to avoid threat to the safety of employees and crew will be recorded and reported.

For you this means:

- **Reject and oppose any form of bribery.** This includes bribery involving government officials or private individuals/workers in the private sector.
- **Reject and oppose any form of facilitation payment, and never initiate such payments.** Never accept, give or promise anything that could be interpreted as intending to improperly influence a governmental or commercial decision.

Examples:

- Always ask for a receipt to justify expenses and log the expense by describing the nature of the transaction.
- Gifts such as vouchers and cigarettes are the same as providing money.
- Routine hospitality provided to those coming to our company's operations is not considered bribery.

