

HANDLING BRIBERY & CORRUPTION INCIDENTS

- ✦ Clearly state: “We will not participate in any form of bribery or corruption”
- ✦ Include other witnesses
- ✦ Ask for name and identification
- ✦ Inform that a receipt is needed for any transaction
- ✦ Inform that the Head Office must be contacted
- ✦ Politely refuse to consent to bribery
- ✦ Be consistent, maintain the policy, be firm
- ✦ Never let compliance take precedence over safety

REPORTING INCIDENTS



ON BOARD

Contact the “Contingency Officer on Call” (CoC).

Escalate the case to the Fleet Manager as required by the CoC and the Master.



ON SHORE

Contact your superior.

Escalate the case to your responsible Compliance Officer as required by your superior.



ALL facilitation payment requests must be reported to say.no@odfjell.com. State:

- **When** - date and time of the incident
- **Where** - place the incident occurred
- **Who** - name and position of person who made the request
- **What** - type of request

