

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, being a member of the Maritime Anti-Corruption Network (MACN).

The Maritime Anti-Corruption Network (MACN) is a successful industry-led collaborative initiative with a vision of a maritime industry free from corruption. Since its inception in 2011, MACN has grown to include over 160 companies globally, representing over 50% of global tonnage.

Together with its membership MACN has consistently built resilience and addressed various challenges faced by the industry. We work closely with governments, local partners, support the maritime industry with tools and better preparedness and address these challenges through a multi stakeholder approach.

This means we do not tolerate bribery or facilitation payments, no matter how small the amount.

You are requested to convey this information to the relevant authorities in advance of the vessels call and coordinate with them to ensure that it proceeds smoothly.

We expect your active cooperation in complying with our anti-corruption policy and keep us duly informed in the event of a request for facilitation is made.

Yours sincerely,

Our Anti-Corruption Standards

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.

We expect you to:

✔ **Reject and oppose any form of bribery.** This includes bribery involving government officials or private individuals/workers in the private sector.

We identify a bribe as offering, promising, giving, receiving, or soliciting anything of value, to influence how someone carries out a public, commercial, or legal duty.

✔ **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.

Facilitation payments are small payments made to low level officials paid to secure a routine low-level action you are entitled to.

Tips and Tricks to tackle corruption

Prevent corrupt demands

- ✔ Before arrival – Agents to Inform the Master to check the particular documents/ items which are checked by the port officials
- ✔ Where possible, agents should engage in dialogue with port authorities, informing them about the company's anti-corruption policy and MACN membership.
- ✔ In Port – Agents to come onboard before arrival of the authorities or accompany them.
- ✔ In Port – Agents to support the Master and assist in resolving the issue without bribery.
- ✔ If the port authority asks for a bribe, ask to speak to the person's manager.
- ✔ Agent should prepare a list of the number of personnel that will and are authorized to visit vessel (authorities, commercial visitors, etc.)
- ✔ Always ask for an official signed receipt for any item given by the vessel to port authorities.

Reject corruption demands and remain calm and polite

- ✔ Be respectful. Your local knowledge, intelligence and leadership are important tools in the interactions with port authorities.
- ✔ Small items consumed on board, as part of vessel hospitality, is not considered bribery.
- ✔ Deflect corrupt demands. Avoid replying with only "NO". Explain it is your company policy and a requirement of MACN that you cannot give anything. Explain everything on board must be accounted for and any change is to be recorded and reported.
- ✔ Any attempt of corruption demand will be reported to MACN, our Company, Charterer and your country authorities.

Stand your ground to eliminate corrupt demands

- ✔ Use the lessons learned and be consistent in the rejection of corrupt demands.
- ✔ If one vessel successfully rejects a corrupt demand, share this information and experience with MACN and your company. It is likely others can benefit from your experience.
- ✔ Use own or local experience and input to design specific mitigation plans (e.g. seek support from local associations).

Plan/Prepare/Communicate/Stay calm/Stand your ground/Record/Report