

ANTI-BRIBERY POLICY

As part of the Wallem Group, Wallem Shipmanagement is committed to implementing the Anti Bribery policy of the Wallem Groups within the Business unit.

The [Anti Bribery policy of the group](#) is attached for reference.

The Anti Bribery policy prohibits offering, giving, requesting or receiving any bribe whether in cash or other inducement. Facilitation payment is a bribe and is made with the intention of expediting an administrative process. A facilitating payment is a payment made to a public or government official that acts as incentive for the official to complete some action or process expeditiously.

Master and seafarers are prohibited from offering, giving, requesting or receiving any bribe or facilitation payment. If a demand for such bribe is made, Master or his deputy to take following action in sequence:

1. If owners or commercial operators have instructed vessel to call them, he would do so and provide details. In this case, he would inform Technical superintendent of action taken.
2. If there are no instructions from commercial operator or owners, call the Technical superintendent or Back up superintendent of the Vessel and provide details.
3. If the Technical superintendent or back up Technical superintendent are not available, the Master or his deputy to contact the Fleet Manager.
4. Refer to the [Maritime Anti-Corruption Network](#) for further reference

The anti-bribery policy allows hospitality or gifts given in moderation and do not place any expectation on the recipient to reciprocate either in kind or by performing, or failing to perform, any other task in return.

Wallem is committed to a “zero-tolerance” approach to Bribery. Failure to comply with this policy may result in summary dismissal or disciplinary action.

Kind regards

Marine Director/MHR/Wallem