

EQUINOX Group

Anti Bribery and Corruption Policy

Updated 01/01/2019

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1 Introduction

Equinox Group (“the Company”) operates in jurisdictions world wide where financial crime is a criminal offence.

In the context of our operations at the Company, financial crime is any kind of criminal conduct relating to money including any offence involving:

- Fraud or dishonestly; or
- Handling the proceeds of crime

2 Purpose

This policy expands on the Company’s Code of Conduct and further details our requirements in relation to financial crime, specifically relating to:

- Anti-bribery and anti-corruption (“ABAC”)
- Anti-money laundering (“AML”)
- Sanctions

3 Scope and applicability

This policy applies to all entities controlled by the Company and officers, directors, employees as well as workers and third party consultants of the Company, wherever they are located (together “Employees”).

4 Our commitment and responsibilities

The Company will not tolerate any form of financial crime by its employees or Business Partners acting on its behalf and this policy demonstrates our zero-tolerance approach.

The Director or COO will regularly review and update this policy where necessary as our business environment changes and new threats appear.

5 What's the legislation?

As a global business, there is a growing number of, and changes to, laws which apply to jurisdictions in which we operate. The regulatory landscape has become more dynamic and complex. This policy makes reference to some of the key global legislative requirements, however is not intended to be an exhaustive list of all relevant legislation.

Instead, this policy aims to communicate the spirit of the relevant laws and regulations with particular reference to the following:

- Indonesian Regulations
- Foreign Corrupt Practices Act (FCPA) 1997 (as amended)
- UK Bribery Act 2010
- Norwegian Penal Code
- Office of Foreign Assets Control (OFAC) sanctions
- US Economic Sanctions Laws
- European Union (EU) sanctions
- United Nations (UN) Security Council sanctions
- EU 4th Directive on anti-money laundering (AML) and counter terrorist financing (CTF)
- HM Treasury (UK) sanctions

6 Bribery and Corruption

6.1 What is Bribery?

Bribery is an inducement or reward offered, promised or provided, in order to influence a business outcome.

Bribery may involve government officials, companies or private individuals and may occur directly or indirectly through third parties.

6.2 What are your responsibilities?

The company prohibits the following acts being undertaken by any Employee or Business Partner acting on the company's behalf:

- Offering, promising or giving a bribe;
- Requesting, agreeing to receive or receiving a bribe;
- Bribing a Public Official in order to obtain or retain a business advantage

6.3 Public Officials

The term “Public Official” includes elected or appointed officials at all levels of government as well as anyone who is employed by a national, regional or local government or a government-owned or controlled entity, employees of public international organisations, political parties, officials of political parties and candidates for public office.

6.4 Facilitation Payments

The Company prohibits facilitation payments. A facilitation payment is a payment made to a public official to expedite or secure performance of a routine duty which that person is already obliged to perform and where such payment would exceed what is properly due.

The only exception to this is where an employee or Business Partner has reasonable belief that their personal safety is at risk. In such situations the employee must report the details of the payment to Director within 48 hours of making such a payment.

6.5 Gifts, entertainment and hospitality

Employees or Business Partners should not provide gifts to or receive them from any Public Official (or their close families and business associates).

Only gifts, entertainment and hospitality that are reasonable and proportionate, that do not influence business decisions and are not prohibited by law or otherwise may be offered or accepted.

6.6 Political and Charitable donations

The company does not make contributions of any kind to political parties.

No charitable donations will be made by the company with the intent to gain a commercial advantage.

6.7 Conflicts of interest

A conflict of interest exists if actions by an employee are, or could reasonably appear to be influenced directly or indirectly by personal considerations, duties owed to persons or entities other than the Company, or by actual or potential personal benefit or gain. Conflicts of interest do not necessarily have to result in unethical or illegal acts.

Employees and Business Partners must avoid conflicts of interests, including potential conflicts of interest that could create the perception that they may be improperly influenced in their decision making.

If an employee or Business Partner acting on the company's behalf have an actual, perceived or potential conflict of interest they should notify this immediately to their manager and the Director and adhere to any instructions provided on how to address such conflict of interest.

7 Anti-Money Laundering

7.1 What is money laundering?

Money laundering is a term used to describe the process of hiding the criminal origins of money or property which are proceeds of crime within legitimate business activities.

It can also be the use of money of a legitimate origin that supports terrorism.

7.2 What are your responsibilities?

The company prohibits the following acts being undertaken by an employee or Business Partner:

- concealing, disguising, converting, transferring criminal money or property;
- entering into or becoming concerned in an arrangement that a person knows or suspects facilitates, by whatever means, the acquisition, retention, use or control of criminal money or property by or on behalf of another person; and
- acquiring, using or possessing criminal money or property

Employees of the Company should undertake appropriate due diligence to assess the integrity and identity of third parties.

Should any employee of the Company have any knowledge or suspicion of money laundering they should report this to the Director and COO.

8 Sanctions and Export control laws

8.1 What is a sanction or Export control?

Sanctions are economic or trade penalties which governments may impose against foreign countries, entities, organisations, or individuals who engage in acts contrary to international law or against the government's national security interests.

The purpose of sanctions is to change conduct related to activities such as:

- Terrorism
- Money laundering
- Human rights abuses
- Narcotics trafficking
- Proliferation of nuclear or chemical weapons

As well as restrictions in activities with certain individuals, groups and/or countries, there are also sanction requirements relating to interacting/using some Ships, appropriate checks should be carried out to make sure these requirements are not being breached.

Export controls are restrictions on importing or exporting "controlled items", including certain goods, raw materials, services, or technologies.

These restrictions and prohibitions may depend on the nature of the items, the country of origin, the end-use, or on the identity and activities of the counterparty.

8.2 What are your responsibilities?

Employees and Business Partners must observe and comply with applicable local and extraterritorial sanctions and export controls requirements.

Any third party, including but not limited to, agents, suppliers, service providers, distributors, vendors, consultants, banks or other financial service providers should have appropriate due diligence carried out to make sure they are not under any sanction and/or trade controls restrictions.

Should any Employee or Business Partner suspect a violation of trade controls they must inform the Director.

9 Managing incidents and reporting a concern

Should any employee or Business Partner acting on behalf of the Company have a concern or know or suspect a violation of this Financial Crime Policy they can either report the matter:

- Directly to your line manager, Director, audit committee member or independent director as appropriate.
- Via the third party compliance hotline on the numbers attached at Appendix A or via the online link <https://wrs.expolink.co.uk/>

Any reports will be handled confidentially, impartially and in a timely manner and in accordance with the Company complaints procedure.

10 Disciplinary action

Financial crime such as bribery, money laundering and breaching international sanctions are offences which can lead to criminal penalties for you as an individual as well as the Company.

In addition to this, breaches to this policy will result in prompt disciplinary actions, which may include dismissal / termination of contract.

11 Training

Appropriate risk based communication and training will be provided to employees and Business Partners as part of their on-boarding and ongoing development programme. If you have any questions regarding your training please contact your line manager or the Director.

12 Further Detailed Guidance

Specific guidance and procedures with regards to the following areas are incorporated into our guidance manuals. If you feel uncertain at any time regarding these guidance manuals, please refer to the policy owner or the Director.

- Code of Conduct
- Gifts and Entertainment
- Third party engagement
- Complaints Procedure

**EQUINOX GROUP
CODE OF CONDUCT**

ARTICLE 1 INTRODUCTION

- (1) The purpose of this code of conduct (the "Code of Conduct") is to create a sound corporate culture and to preserve the integrity of the EQUINOX GROUP (the "Group") and promote compliance with applicable laws and regulations and internal policies.
- (2) The Code of Conduct applies to all entities within the EQUINOX GROUP.
- (3) All Employees are required to read and understand the Code of Conduct and confirm the same in writing.
- (4) Each Employee is responsible for his or her compliance with the Code of Conduct. Violation of the Code of Conduct will constitute grounds for disciplinary action, including, when appropriate, termination of employment.
- (5) Employees who themselves violate, or observe or become aware of any situation that they believe to be a violation of, the Code of Conduct, have an obligation to immediately notify their immediate superior or
Director (sanggam@ppequinox.com tel: +628119445009)
COO (gpradeep@ppequinox.com tel: +62 811938138)
- (6) When a superior or the Compliance Contact receives report of a violation, it will be the recipient's responsibility to handle the matter. If an Employee reporting a violation wishes to remain anonymous, all reasonable steps will be taken to keep the Employee's identity confidential.
- (7) All communications will be taken seriously and, if warranted, any reports of violations will be investigated. The Group will not retaliate, or allow retaliation in respect of, any reports made by an Employee in good faith.

ARTICLE 2 GENERAL

- (1) The Group requires its Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees must practice honesty and integrity in every aspect in dealing with other Employees, business relations, the business community, shareholders, competitors and government authorities.
- (2) When acting on behalf of a Group company, Employees shall not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair dealing practices.

- (3) The Group's assets are only to be used for legitimate business purposes and only by authorised Employees. If an Employee becomes aware of theft, waste or misuse of the Group's assets, the Employee should report this to his or her superior or to the Compliance Contact.
- (4) The Group shall be a professional and positive workplace with an inclusive working environment. The Group prohibits unlawful discrimination against Employees or any third party on account of religion, skin colour, gender, sexual orientation, age, nationality, race or disability. All persons shall be treated with dignity and respect. The Company does not tolerate behaviour that can be perceived as degrading or threatening.

ARTICLE 3

COMPLIANCE WITH LAWS AND REGULATIONS

- (1) It is the Group's policy to comply with all applicable laws and regulations in the countries where it operates, and it is the personal responsibility of each Employee to comply with such laws and regulations.

ARTICLE 4

FINANCIAL CRIME

1 General

- (1) Financial crime is any kind of criminal conduct relating to money, including corruption, fraud, money laundering or financing of terrorism.
- (2) The Group will not tolerate any form of financial crime by its Employees and this Code of Conduct demonstrates the Group's zero-tolerance approach.
- (3) There is a growing number of, and changes to, laws which apply to jurisdictions in which the Group operates. This Code of Conduct makes reference to some of the key global legislative requirements, however is not intended to be an exhaustive list of all relevant legislation. Instead, this Code of Conduct aims to communicate the spirit of relevant laws and regulations, including the Indonesia Regulations, Foreign Corrupt Practices Act (FCPA) 1997 (as amended); UK Bribery Act 2010; Norwegian Penal Code; Office of Foreign Assets Control (OFAC) sanctions; US Economic Sanctions Laws; European Union (EU) sanctions; United Nations (UN) Security Council sanctions; EU 4th Directive on anti-money laundering (AML) and counter terrorist financing (CTF); HM Treasury (UK) sanctions.

2 Bribery

- (1) Bribery is an inducement or reward offered, promised or provided, in order to influence a business outcome. Bribery may involve government officials, companies or private individuals and may occur directly or indirectly through third parties.
- (2) The Group prohibits Employees offering, promising or giving a bribe, requesting, agreeing to receive or receiving a bribe, both from a Public Official¹ and others, in order to obtain or retain a business advantage.
- (3) The Group prohibits facilitation payments. A facilitation payment is a payment made to a Public Official to expedite or secure performance of a routine duty which that person is already obliged to perform and where such payment would exceed what is properly due. The only exception to this is where an Employee has reasonable belief that their personal safety is at risk, in which case the Compliance Contact shall immediately be informed of the payment.

1 The term "Public Official" includes elected or appointed officials at all levels of government as well as anyone who is employed by a national, regional or local government or a government-owned or controlled entity, employees of public international organisations, political parties, officials of political parties and candidates for public office.

- (4) Only gifts, entertainment and hospitality that do not influence business decisions and are not prohibited by law or otherwise, may be provided, offered or accepted to or from any person. Employees shall under no circumstances provide, offer or accept gifts to or from any Public Official or their close families and business associates or any broker, bankers, managers, agents or others representing or associated with any Public Official.

3 Money laundering

- (1) Money laundering is a term used to describe the process of hiding within legitimate business activities the criminal origins of money or property which are proceeds of crime. It can also be the use of money of a legitimate origin that supports terrorism.
- (2) The Group prohibits Employees concealing, disguising, converting, transferring criminal money or property; entering into or becoming concerned in an arrangement that a person knows or suspects facilitates, by whatever means, the acquisition, retention, use or control of criminal money or property; acquiring, using or possessing criminal money or property; and use of money of a criminal or legitimate origin to support terrorism.

4 Sanctions

- (1) Sanctions are economic or trade controls which governments may impose against foreign countries, entities, organisations, or individuals who engage in acts contrary to international law or against the government's national security interests.
- (2) Employees must observe and comply with applicable local and extraterritorial sanctions and trade controls requirements.

ARTICLE 5 CONFLICTS OF INTEREST AND LOYALTY

- (1) The Group requires all Employees to be loyal to it, and to refrain from actions or to have interests that make it difficult to perform their work objectively and effectively.
- (2) Employees may not take for themselves personal opportunities that are discovered through the use of corporate property, information or position.
- (3) Conflicts of interests should be avoided. If a conflict of interest should arise, the Employee will be required to evaluate the situation and notify his or her superior or the Compliance Contact of the conflict of interest. A conflict of interest situation may involve, but are not limited to, financial investments, contract parties, present or prospective employees, competitors or business relations.
- (4) Each Employee shall as soon as possible notify his or her immediate superior or the Compliance Contact of a situation where he or she has a material direct or indirect interest in any transaction or other matter entered into, or that may be entered into, by the Group or binding on the Group.
- (5) Each Employee shall comply with the Equinox Group policy when engaging in financial transactions.

ARTICLE 6 CONFIDENTIALITY AND MEDIA COMMUNICATION

- (1) Employees may have access to privileged, proprietary or confidential information (jointly, "Confidential Information") concerning the Group's business, its strategic and other investments, contract parties, competitors or business relations. Employees are required to keep such Confidential Information confidential during employment as well as thereafter, and not to use, disclose, or communicate that Confidential Information other than in the course of employment. The consequences to the Group and the Employee concerned can be severe where there is unauthorized disclosure of any Confidential Information.

- (2) All non-standard inquiries from regulatory authorities or government representatives should be referred to the appropriate superior.

ARTICLE 7

BOOKS AND RECORDS

- (1) All business records, expense accounts, vouchers, bills, payrolls, service records, reports to government agencies and other reports must accurately reflect the facts.
- (2) The books and records of the Group must be prepared with care and honesty and must accurately reflect the Group's transactions. All corporate funds and assets must be recorded in accordance with Group procedures. No undisclosed or unrecorded funds or assets shall be established for any purpose.
- (3) Employees must neither take, nor direct or permit others to take, any action to fraudulently influence, coerce, manipulate or mislead independent public accountants engaged in the audit or review of the Group's financial statements, or fail to correct any materially false or misleading financial statements or records, for the purpose of rendering those financial statements materially misleading.

Appendix 1 - Confirmation

Company Name:

I confirm that I have read, understood and will comply with the Anti Bribery and Corruption Policy

Signed:

Name:

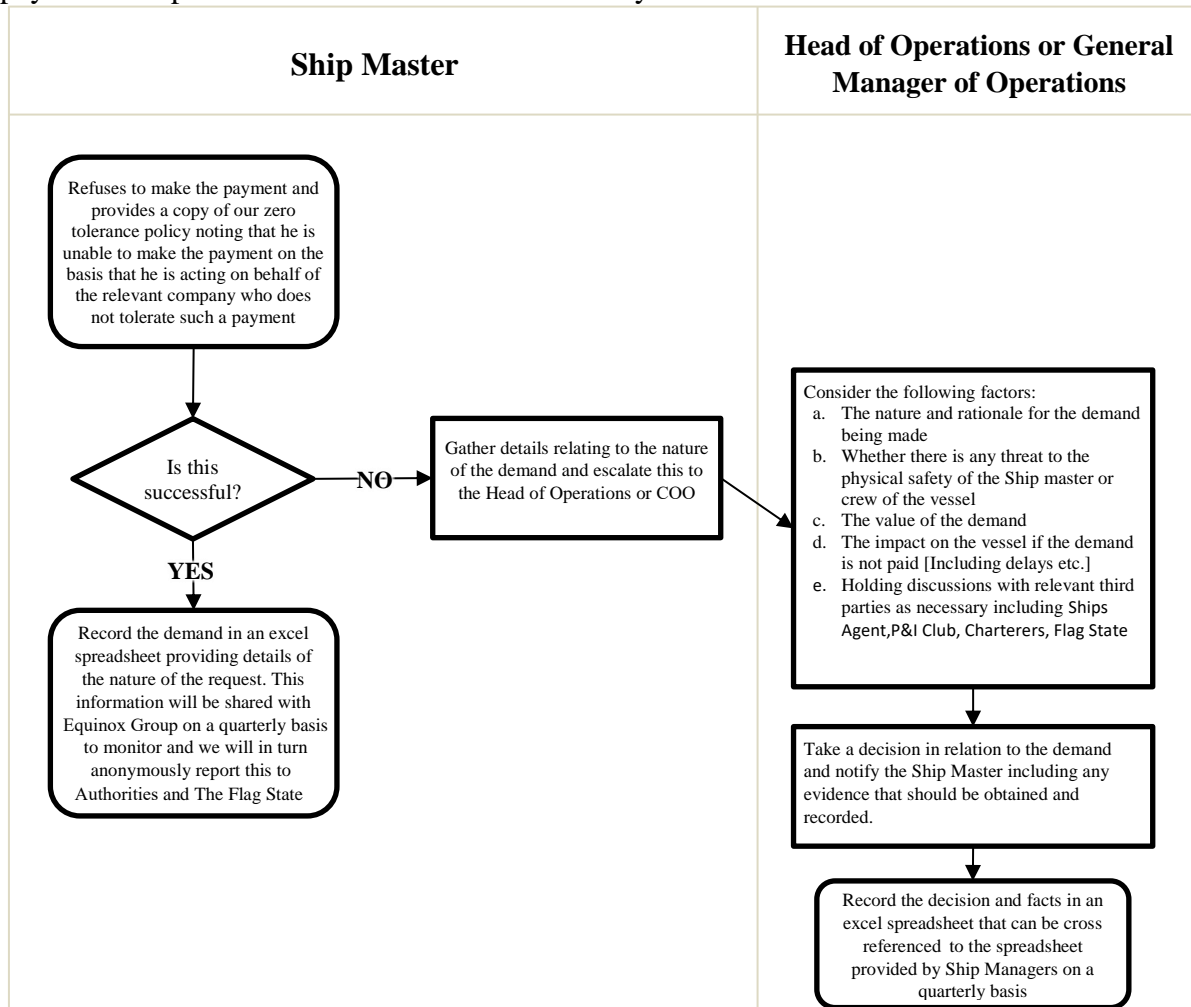
Position:

Date:

Please return signed pdf copy to Equinox Group by email or hardcopy to QHSE Dept.

Appendix 3: Process and procedure to be followed in relation to facilitation payment demands

Below is the step by step process to be followed for receipt of a demand for a facilitation payment at a port to which the vessel is ordered by the relevant owner



N.B. The Ship Manager shall exercise the same level of controls when the vessel is visiting any place other than ordered to by The Owner (for example a husbandry call), and the Master must have a similar reporting line with the Ship Manager, and maintain the same records as noted above.

Maritime Anti-Corruption Network

Working toward a maritime industry free of corruption that enables fair trade to the benefit of society at large



About this brief

This brief is about highlighting a specific risk relating to anti-corruption compliance enforcement. In this brief we are focusing on supply chain dialogue, enabling MACN members to share these risks internally and to encourage internal discussions to reduce and mitigate these risks.

Vessel and cargo clearance – overview

The highest risk for corruption for a shipping company, or any of the maritime players is during the time in the ports, specifically during vessel and cargo clearance. Shipping is a risky business in the sense that regular interaction with authorities during port operations provides ample opportunity, on both sides (industry and government), for unethical behaviour.

The maritime industry is exposed to multiple layers of integrity risks, such as frequent demands for facilitation payments including cash or in-kind benefits. Challenges of this kind give rise to operational disruptions and increased operational costs. In some cases, rejecting demands endangers the safety of the crew and vessel.

“It is not always that the dialogue between the individual Captain and local agent is monitored or even highlighted as a potential corruption risk.”

Before a port call, the Captain contacts the appointed port agent for local guidance. It can be a colleague (shipowner's own employees), or an agent appointed by the shipowner or the charterer. The local agent sends guidance to assist in preparing for the port call and this guidance (so called port memos) normally allows for the vessel clearance to run as smooth as possible. It is also normal practice that the agent is welcoming the ship upon berthing at the terminal. Some government officials onboard the ship straight after arrival and normally accompanied with the agent for example Port Health, Customs and Immigration authorities. Then other authorities may be coming on board – but they can come without being accompanied with the agent and some may not even come onboard at all.

After the vessel has sailed, there is a reconciliation of all – mainly cargo related - documentation with the port authority. Authorities may try to have documents signed by the vessel, which carry inflated or wrong cargo details. If these have been signed by the ship, it can create problems during those reconciliation meetings. Therefore, if any authority comes on board with documents to be signed during the stay in port, it should be arranged with the local agent's close attention and awareness.

Highlighting specific risks in the vessel clearance process

- As described above, a port memo is the guidance sent from the local agent to the Captain. The port memo often highlights requests for souvenirs, gifts or entertainment which are needed for the port officials. If the Captain is challenging these practices, it can lead to port officials not willing to cooperate or in some cases the agents do not want to cooperate.
- The local agents may use different port memos depending on the shipowners' stand on ethics and integrity. In practice, this means that the agents may be forced to work with different standards and communicate different messages to the port officials. This makes it more difficult for the agents to maintain a solid integrity stand.
- In many situations it may not be clear if the described souvenirs or gifts are handed over to the authorities or if these are taken by the local agents for her or his own discretion.
- Agents may be instructed by the ship owners operational division to "do what is necessary" to avoid delay and secure a smooth port call, despite the shipowner having a solid anti-corruption policy.



Mitigating actions:

- ✓ MACN recommends that the ship owner and the agent (HQ level) specifically ask to review port memos in countries prone to corruption
- ✓ In advance of a port call, MACN recommends that ship owners inform the agent of the company policy (see MACNs "Agent toolkit")
- ✓ In advance of a port call, MACN recommends the agent to inform the port officials of the shipowner's anti-corruption policy
- ✓ Shipowners are encouraged to communicate their anti-corruption policy throughout their whole organization which will mitigating the risks for sending mixed signals to port agents or other supply chain partners



The Maritime Anti-Corruption Network (MACN) is a global business network working toward its vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

Website: www.maritime-acn.org

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 authorize 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.





COMMON ISSUES

in countries
prone to corruption

In many ports, Captains face a lack of transparency around fees and fines. Further, demands for petty corruption such as facilitation payments are common. In these locations, port calls can be stressful for the crew.

This guide provides advice for the Captain and crew in countries where the risk of corrupt demands is high.



SAFETY ALWAYS COMES FIRST!

Never put **yourself, your crew, or your ship in danger**, but escalate and report these situations internally afterwards.



MACN
Maritime Anti-Corruption Network

The Maritime Anti-Corruption Network (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 grown to include around 90 members globally in 2017, and has become one of the pre-eminent examples of collective action to tackle corruption.

TACKLING MARITIME CORRUPTION

Best Practice Guide for Frontline Staff



MACN
Maritime Anti-Corruption Network

STEP 1

Prevent Corrupt Demands

Plan in Advance—Avoid last minute requests

- ✓ Double check all documentation in advance.
- ✓ Submit documentation electronically when possible.
- ✓ Have all relevant documentation in order and have it ready when meeting with the government officials.
- ✓ Include as much lead time as possible when planning actions that require government interaction.
- ✓ It is also important to be prepared operationally:
 - ◆ Discharge expired medicine. It may be difficult to discharge medicine in some ports. Seek guidance from Operations on where to best discharge expired medicine prior to calling ports where you know expired medicine might be an issue.
 - ◆ Check all medicine lists to ensure they reflect the actual medical supply.
 - ◆ Check individual crew members' paperwork, and escalate directly to your Crew operator if the paperwork is not in order. This may include crew visas, yellow fever certificates, employment contracts, etc.
- ✓ Seek information from the agent on how official payments (fees, fines) should be paid before engaging in dialogue with government officials—this will help you to avoid cash transactions. You also show that you are aware of local requirements.
- ✓ Where possible, your company's local manager or agents should engage in dialogue with local authorities, informing them about your company's anti-corruption policy. This action can prevent a demand later.
- ✓ Inform the agent in advance of your company's anti-corruption policy, and of the fact that third parties acting on your company's behalf must enforce the same rules.

- ✓ Have anti-corruption signs clearly visible for visitors (at the gangway and in the office).
- ✓ Collect data on corrupt demands. Share these internally.
- ✓ If relevant, check the charterer's instruction on corruption, and especially on facilitation payments.
- ✓ In ports prone to corruption, assess if it is relevant to have a P&I club representative or protective agent onboard when meeting with authorities.

STEP 2

Reject Corrupt Demands

Remain Calm & Polite—Try to Keep Cool!

- ✓ Your social skills, intelligence, and leadership are important tools in the interactions with government officials.
- ✓ Be respectful. For example, it is okay to offer general hospitality, such as refreshments while the government officials sign relevant documentation.
- ✓ Don't reply with only a "NO"—explain through positive wording with the aim of coming to a mutual understanding on what can and can't be done.
- ✓ Explain your company's anti-corruption policy—including that you record all form of payments and gifts.
- ✓ Show your company's anti-corruption policy and the MACN logo.
- ✓ If the government official is asking for a bribe, ask to escalate to the person's manager.
- ✓ Always ask for an official fine with an official letterhead if you are asked to pay for any noncompliance issue.

STEP 3

Eliminate Corrupt Demands

Stand Your Ground!

- ✓ Use the lessons learned and be consistent in the rejection of corrupt demands.
- ✓ If one vessel successfully reduced or eliminated demands, share the experience so sister ships can follow. If you are successful once, it is likely that the success can continue.
- ✓ Share information data and performance on how the mitigation of corrupt demands is progressing—among ships, in the office, and among offices in the same geographical region.
- ✓ Prepare new colleagues on what to expect before the first government official interaction in a specific location.
- ✓ Use local experience and input to design specific elimination plans e.g. seek input from agents on the best way to eliminate corrupt demands, or facilitate a dialogue with local third parties on how to combat corrupt demands jointly.

TACKLING MARITIME CORRUPTION



Best Practice Guide for Staff



COMMON ISSUES in countries prone to corruption

In many ports, Captains face a lack of transparency around fees and fines. Further, demands for petty corruption such as facilitation payments are common. In these locations, port calls can be stressful for the crew. This guide provides advice for the Captain and crew in countries where the risk of corrupt demands is high.

SAFETY ALWAYS COMES FIRST!

Never put **yourself, your crew, or your ship in danger**, but escalate and report these situations internally afterwards.



STEP 1: PREVENT CORRUPT DEMANDS



Plan in Advance—Avoid last minute requests

- ✓ Double check all documentation in advance.
- ✓ Submit documentation electronically when possible.
- ✓ Have all relevant documentation in order and have it ready when meeting with the government officials.
- ✓ Include as much lead time as possible when planning actions that require government interaction.
- ✓ It is also important to be prepared operationally:
 - **Discharge expired medicine.** It may be difficult to discharge medicine in some ports. Seek guidance from Operations on where to best discharge expired medicine prior to calling ports where you know expired medicine might be an issue.
 - **Check all medicine lists** to ensure they reflect the actual medical supply.
 - **Check individual crew members' paperwork**, and escalate directly to your Crew operator if the paperwork is not in order. This may include crew visas, yellow fever certificates, employment contracts, etc.
- ✓ Seek information from the agent on how official payments (fees, fines) should be paid before engaging in dialogue with government officials—this will help you to avoid cash transactions. You also show that you are aware of local requirements.
- ✓ Where possible, your company's local manager or agents should engage in dialogue with local authorities, informing them about your company's anti-corruption policy. This action can prevent a demand later.
- ✓ Inform the agent in advance of your company's anti-corruption policy, and of the fact that third parties acting on your company's behalf must enforce the same rules.
- ✓ Have anti-corruption signs clearly visible for visitors (at the gangway and in the office).
- ✓ Collect data on corrupt demands. Share these internally.
- ✓ If relevant, check the charterer's instruction on corruption, and especially on facilitation payments.
- ✓ In ports prone to corruption, assess if it is relevant to have a P&I club representative or protective agent onboard when meeting with authorities.

STEP 2: REJECT CORRUPT DEMANDS



Remain Calm & Polite—Try to Keep Cool!

- ✓ Your social skills, intelligence, and leadership are important tools in the interactions with government officials.
- ✓ Be respectful. For example, it is okay to offer general hospitality, such as refreshments while the government officials sign relevant documentation.
- ✓ Don't reply with only a "NO"—explain through positive wording with the aim of coming to a mutual understanding on what can and can't be done.
- ✓ Explain your company's anti-corruption policy—including that you record all form of payments and gifts.
- ✓ Show your company's anti-corruption policy and the MACN logo.
- ✓ If the government official is asking for a bribe, ask to escalate to the person's manager.
- ✓ Always ask for an official fine with an official letterhead if you are asked to pay for any noncompliance issue.
- ✓ Be clear that you can pay the fine but that your company requires that you do so to the government office—not to individual government officials.
- ✓ Never pay anything to decrease an official fine or penalty.
- ✓ Insist that the government official needs to sign a receipt for anything given by the Master or frontline staff.
- ✓ Wear formal dress when meeting government officials e.g. Captain's uniform.

STEP 3: ELIMINATE CORRUPT DEMANDS



Stand Your Ground!

- ✓ Use the lessons learned and be consistent in the rejection of corrupt demands.
- ✓ If one vessel successfully reduced or eliminated demands, share the experience so sister ships can follow. If you are successful once, it is likely that the success can continue.
- ✓ Share information data and performance on how the mitigation of corrupt demands is progressing—among ships, in the office, and among offices in the same geographical region.
- ✓ Prepare new colleagues on what to expect before the first government official interaction in a specific location.
- ✓ Use local experience and input to design specific elimination plans e.g. seek input from agents on the best way to eliminate corrupt demands, or facilitate a dialogue with local third parties on how to combat corrupt demands jointly.



WELCOME on board

We encourage you to study the information below and follow the instructions given to you by the crew member welcoming you. This is to help ensure a safe and secure working environment for our visitors on board.



PLEASE DO

- ☒ Read the Visitor Notice
- ☒ Sign the Visitor Log
- ☒ Follow the on board rules and requirements
- ☒ Follow the company's relevant policies and procedures while on board
- ☒ Follow the alarms and instructions given by the crew
- ☒ Use the correct garbage receptacles
- ☒ Report anything you consider unsafe
- ☒ Keep your workplace tidy and help maintain a safe working environment



PLEASE DON'T

- ☒ Smoke outside of designated areas
- ☒ Make unnecessary noise
- ☒ Enter any areas not related to your work on board
- ☒ Use cameras, mobile phones, or other electronic devices outside accommodation areas
- ☒ Block walking areas or doors, especially around fire escapes and exit routes



STOP CORRUPTION



**DO NOT ASK
WE WILL NOT PAY**

We are part of the Maritime Anti-Corruption Network (MACN)—a global business network tackling corruption in the maritime industry.

We have a strict anti-corruption policy, with zero tolerance for bribery.

This means that our Masters are under instructions not to make any payments or give any gifts.

Any such demands will be reported.

For more information please visit: www.maritime-acn.org



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Alarm Signals



Whistle



Alarm Bells
and Sirens

Boat and Emergency Alarm

At least 7 **short** blasts
(1-2 secs)
followed by
1 long blast
(5-6 secs)

At least 7 **short** sounds
followed by 1 **long** sound

Fire Alarm

Long blast of
a period not
less than 10
secs at least
3 times

Continuous
sounding

Men Overboard Alarm

3 long blasts
at least 4
times

3 long
sounds at
least 4 **times**



Notes/Comments:

WELCOME on board



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- Keep your workplace tidy and help maintain a safe working environment

Use your personal
protective equipment



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If you have any input related to your visit on board this vessel, please fill out the last page on this pamphlet and request it to be sent to shore side management.

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- Make unnecessary noise
- Enter any areas not related to your work on board
- Use cameras, mobile phones, or other electronic devices outside accommodation areas
- Block walking areas or doors, especially around fire escapes and exit routes

Tips & Tricks to Reject and Mitigate Corrupt Demands

Do Reject Corrupt Demands Remain Calm & Polite:

- Your social skills, intelligence, and leadership are important tools in the interactions with government officials.
- Be respectful. For example, it is okay to offer general hospitality, such as refreshments while the government officials sign relevant documentation.
- Don't reply with only a "NO"— explain through positive wording with the aim of coming to a mutual understanding on what can and can't be done.
- Explain your company's anti-corruption policy—including that you record all form of payments and gifts.
- Show your company's anti-corruption policy and the MACN logo.
- If the government official is asking for a bribe, ask to escalate to the person's manager.
- Always ask for an official fine with an official letterhead if you are asked to pay for any noncompliance issue

Do Stand Your Ground to Eliminate Corrupt Demands:

- Use the lessons learned and be consistent in the rejection of corrupt demands.
- If one vessel successfully reduced or eliminated demands, share the experience so with your colleagues can follow. If you are successful once, it is likely that the success can continue.

- Share information data and performance on how the mitigation of corrupt demands is progressing - in the office, and among offices in the same geographical region.
- Prepare new colleagues on what to expect before the first government official interaction in a specific location.;
- Use own or local experience and input to design specific elimination plans e.g. seek support from local associations

Do Not:

- Offer, authorize, promise, solicit, accept or make an unauthorized or improper payment (in cash or otherwise)
- Attempt to induce a government official or private person to do something illegal or help someone else to break the rules and regulations.
- Offer or receive money, gifts, kickbacks, commissions or anything else of value to gain an improper advantage.
- Offer or agree to an unofficial payment to a government official to avoid a legitimate fine, even if the requested payment is much cheaper than the fine. You must always obtain an official receipt for any fine paid and we always have the choice to challenge the authority issuing the fine if we believe the fine is not legitimate or too excessive
- Speed up can be misinterpreted e.g. we can't pay to get a benefit we are not entitled to