


<b>Document Title</b>	Anti-Bribery and Corruption Policy Statement	
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<b>Document Approval</b>	Douglas Leask	
<b>Applicability</b>	All Employees	
<b>Pages</b>	1	

## ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Leask Marine requires all employees and associated persons to:

- ☉ Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- ☉ Act honestly, responsibly and with integrity at all times while representing the Company
- ☉ Safeguard and uphold the Company's standard by operating in an ethical, professional and lawful manner at all times.

### **Bribery of any kind is strictly prohibited.**

Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. **If in doubt** as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to your line manager.

The giving and receiving of business gifts is not prohibited provided the following requirements are met:

- ☉ The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- ☉ It complies with local laws
- ☉ It is given in the Company's name, not in the giver's personal name
- ☉ It does not include cash or a cash equivalent (such as gift vouchers)
- ☉ It is of an appropriate and reasonable type and value and given at an appropriate time
- ☉ It is given openly, not secretly
- ☉ It is approved in advance by the Managing Director

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

This policy will be reviewed annually to ensure it reflects the businesses current priorities, plans and targets.



Signed:

Name: Douglas Leask, Managing Director

Date: 1<sup>st</sup> January 2020

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