



## Transport & Offshore Services (TOS) Anti-Bribery and Corruption policy (ABC Policy)

*we make it personal!*

### **Company statement**

All TOS Companies consider all forms of bribery and corruption unacceptable. We believe in a transparent and fair way of doing business in compliance with the law. Bribery and corruption causes damage to international commerce, therefore we do not accept bribery and corruption in our company. This policy should be read in conjunction with the company's code of conduct for ship deliveries.

TOS will continually uphold all relevant anti-bribery and anti-corruption laws in all the jurisdictions we operate.

### **Scope**

This policy applies to all individuals working on behalf of TOS at all levels, whether fixed term, permanent or temporary and located worldwide.

### **Bribery**

A bribe could be, but is not limited to: *any inducement or reward* offered, promised or provided in order to gain commercial, contractual or personal advantage. We do not allow any of our employees to directly or indirectly offer; promise; give; or demand bribes or other unfair advantages. Bribery is prohibited by law and thus, illegal.

### **Inducement or reward**

An inducement or reward could be anything of value. This could be, but is not limited to: cash; gift cards; benefits and favours; performing services; gifts; contracts or business opportunities; employment opportunities; charitable donations; meals; shopping and stock options or investment opportunities.

### **Gifts**

This policy does not prohibit normal and appropriate gifts (given and received) by third parties. Gifts from third parties, such as Christmas gifts for business purposes, are allowed only up to a value of 100,- Euro. Such gifts must not be prohibited by law in the relevant country, must be appropriate, must be given openly, not secretly, must not convey the impression that a favour in return is necessary and must not include cash. If our employees suspect, know or doubt that a gift may be more expensive or inappropriate, they should consult with their supervisor to determine whether it is allowed to accept the gift.

### **Charitable donations**

TOS encourages the act of donating to charities. We will ensure that all charitable donations made are legal and ethical under local law and practices. We will ensure that charitable contributions are not used to facilitate and conceal acts of corruption.

### **Employee responsibilities**

Our employees must ensure to read, understand and comply with the information within this policy. If our employees have a reason to suspect or believe that bribery has occurred or will occur, they need to notify the legal department about the matter.

When an employee is being extorted, pressured or threatened by a third party to give a bribe, the employee shall reject the offer and notify his/her supervisor.