

BRIBERY & CORRUPTION POLICY STATEMENT

KD Marine operates a zero tolerance approach to bribery and corruption as defined by the UK Bribery Act which prescribes the following five bribery offences:

- The giving of an advantage to get a business person or public official to do something improper.
- The receipt of an advantage to do something improper.
- The giving of any advantage to a foreign public official with the intention of influencing the official and to obtain a business advantage.
- Person consent or connivance to bribe by the company
- Corporate failure to prevent bribery by an “associated person, agent, co-venture etc.”

Facilitation payments are payments which induce officials to perform routine functions they are otherwise obligated to perform. Facilitation payments are bribes and there is no exemption for them.

The bribery act stipulates that a party can be held liable if someone who performs services for it in whatever capacity pays a bribe specifically to get business, keep business or gain business advantage. This applies for example, to subsidiaries, joint ventures, associates and agents.

The legislation does not seek to proscribe genuine hospitality or similar business expenditure such as; sponsorship of sporting events, dinners, gifts and charitable events etc.

What you should do:

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for KD Marine or under KD Marine control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy

Workers should report any breach or, attempted breach of the act to line management. Failure to comply with this policy will render employees liable to disciplinary action and, possible criminal charges.

H C Petersen

Managing Director



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