

# Anti-Bribery Policy

## 1.0 Overview

These Guidelines apply to all individuals regardless of nationality and location of employment or project working for our Company including:

- Employees
- Contractors
- Seafarer
- Trainees, apprentices and interns
- Agents
- Agency and temporary staff

In addition, we expect these Guidelines or similar standards of conduct to be adhered to by anyone else associated with our Company, who perform services for us or on our behalf. This includes those we enter into joint ventures with or with whom we collaborate on projects or service provision for our clients. It includes our agents, brokers, sub-contractors, representatives, distributors, consultants and other providers.

**This policy is compliant with the Maritime Labour Convention 2006.**

## 2.0 Bribery – What is the Law?

The Bribery Act 2010 came into force on 1st July 2011 and sets out the law on corruption offences. The offences under the Bribery Act are extensive in scope, broadly defined and also allow for offences committed anywhere in the world to be prosecuted in UK courts. The same standards therefore apply to conduct that occurs both in the UK and in any business we undertake abroad.

The Company has a legal responsibility under the Act to prevent bribery by any employees or any third parties on its behalf. As a business, these Guidelines are part of a package of measures we have adopted to protect the company and its employees from the risk of corrupt activity by ourselves or by third parties on our behalf.

### Penalties:

The Bribery Act has serious consequences for anyone guilty of bribery.

- For individuals, a maximum prison sentence of 10 years and/or an unlimited fine can be imposed;
- For companies, an unlimited fine can be imposed and debarment from public contracts.
- Under the Proceeds of Crime Act 2002 (any gain from bribery being treated as the proceeds of a crime) penalties include:
- Confiscation of company or personal assets, where these are found to be the proceeds of criminal activity and

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- Unlimited fines for individuals or companies and
- Maximum prison sentence for individuals of 14 years.

These penalties under The Proceeds of Crime Act apply equally to anyone who is involved in assisting with the concealment or retention of any proceeds of crime. This could apply to those who deal with the revenues generated by a contract knowing that someone else obtained that contract by bribery.

It is important to be aware too that any conviction of one of our companies for corruption or fraud would result in a mandatory disqualification from bidding for work to any Public Authorities and Utilities Companies in UK and other EU states under EU Procurement Regulations.

The adverse publicity of a conviction would itself be very serious for our business.

## **OFFENCES UNDER THE BRIBERY ACT**

The Bribery Act contains four main offences:

- Paying or offering bribes - Applies to you and Oceanscan
- Receiving or requesting bribes - Applies to you and Oceanscan
- Bribery of a foreign public official - Applies to you and Oceanscan
- Failure to prevent bribery - Applies to Oceanscan

In addition, if anyone at senior management level “consents or connives” (ie turns a blind eye) in an act of bribery by Oceanscan, they can be personally prosecuted and face the same penalties as a person who carried out the bribe.

As a reference guide, we set out below explanations of each of these offences. All employees of Oceanscan must themselves comply with the applicable law in this area, including the Bribery Act, and should report to their line manager or the Managing Director, or (if they feel uncomfortable doing this) via the Government helpline, any suspicion that others, whether employed by Oceanscan or not, have failed to comply.

### **Paying or offering bribes**

It is an offence if you offer, promise or give a financial or other advantage with the intention of inducing another person to “perform a function or activity improperly” or to reward that person for doing so.

However, it is not necessary to prove you intended this consequence: it is also an offence if you know or believe that acceptance of the advantage by another is in itself an improper performance of their function or activity.

### **Receiving or requesting bribes**

It is an offence if you request, or agree to accept, or receive a financial or other advantage intending that a “function or activity should be performed improperly” as a result.

It is also an offence:

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- Where your request or receipt of the advantage is in itself an improper performance of a function or activity;
- Where your request or receipt is a reward for your or someone else's improper performance in the past;
- Where your improper performance takes place in anticipation or as a consequence of a request or receipt of an advantage.
- In these other scenarios, it does not matter whether you know or believe that the performance of a function or activity is improper.

## What activities do these offences apply to?

Paying and receiving bribes can potentially occur in relation to all kinds of function or activity connected to your work at Oceanscan. These include any function performed by others of a public nature and any activity connected with a private sector business.

Therefore, amongst other things, the offences apply to:

- Our dealings with our clients in the private and public sectors
- Our dealings with any of our sub-contractors, consultants or other service providers or agents
- Our dealings with public authorities and regulatory bodies, including local government and other agencies.

## Bribery of a foreign public official

It is an offence if you offer or give a financial or other advantage to a foreign public official with the intention of influencing the foreign public official in order to obtain or retain business or a business advantage. This is a low threshold for the offence to be committed as it does not require an intention that the official exercises his role improperly; it is sufficient that the offer is made to influence and to obtain or retain business or a business advantage.

### 3.0 Enforcement

Employees that do not adhere to this policy may be subject to disciplinary action up to and including dismissal. Any employee aware of any violation of this policy is required to report it to their supervisor or authorised representative.

This statement is made pursuant to Section 54(1) of the **Modern Slavery Act 2015** and constitutes Oceanscan Limited's anti-slavery and human trafficking statement.

Signed:

  
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**K.S. Hunter**  
**Managing Director**

**Date: June 2021**