

# Anti-bribery and corruption



**1 Anti-bribery and Corruption**

As a signatory to the UN’s Global Compact since 2007, Semco Maritime is committed to the highest standards of integrity, honesty, and fairness in all internal and external relationships, in accordance with all applicable laws and regulations, including, but not limited to, anti-bribery and anti-corruption laws.

Semco Maritime A/S’ employees shall not directly or indirectly accept, solicit or offer bribes, kick-backs, facilitation payments or any other unjustified advantages in order to improperly influence or to gain an unfair business advantage from any governmental or private entity. We have built our anti-bribery and corruption policy’s foundation “Prevent – Monitor – React” on the basis of the 6 principles of the Bribery Act 2010 (UK).

Semco Maritime has developed a series of initiatives to prevent bribery, corruption and the perception of these. They are as follows:

**1.1 Proportionate procedures:**

- by designing and implementing (i) an “anti-bribery policy” (see POL-SEMCO-0016) and (ii) actual, suitable and proportionate “anti-bribery procedures” to handle risk-exposures in our markets
- by synergizing the necessary resources of our CEO, CFO, the Legal- and the HSEQ departments - ensuring the appropriate attention to our anti-bribery and corruption policy and procedures
  - e.g. by capping gifts to €150 - other promotions and hospitality gestures are regulated in each incident based upon specific criteria

**1.2 Top-level commitment:**

- by having our CEO and CFO and “owning” the anti-bribery policy
- by having a Culture & Development internal program and Group General Counsel proactively sponsoring the policy, when necessary
- by having our Senior Vice-Presidents and Vice presidents annually (via for instance the intranet and similar internal communication channels) make aware employees of the policy/procedures

**1.3 Risk assessment:**

- by evaluating - as applicable - the risks associated to our potential and current projects with regard to the risks inherent with:
  - (j) geography and (ii) industry sector
  - (iii) nature of transaction and (iv) scope and nature of the necessary partnerships
- by when necessary - devoting - specific resources (Legal- as commercial) to identify potentially risk agreements related to supply (from simple Purchase Order to full-blown EPC contract with Operation and Maintenance), purchasing, agents and consultants

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**1.4 Due diligence:**

- by inserting an anti-bribery clause in internal Contract Review Guidelines across Semco Maritime's divisions
- by including a specific set of questions on the anti-bribery and corruption policy in our HSE&Q Department's new set of internal auditing rules

**1.5 Communication:**

- by bringing focus on the anti-bribery and corruption policy in introductory courses for new employees
- by making our Code of Conduct readily available on our internet site, along with the updated version of our Communication on Progress ("COP") report and Global Business Manual - including the anti-bribery and corruption policy and procedures
- by training, through our Contract Review Guidelines course, all Semco Maritime employees involved in contract negotiations to make aware counterparts on bribery clauses

**1.5.1 Monitoring and review:**

- by having established either a Business Ethics Committee or another suitable legal internal body to annually review and adjudicate on instances related to our anti-bribery and corruption policy and procedures;
- by regularly modifying, updating and adding to the anti-bribery and corruption policy and procedures during reviews and monitoring conducted by our HSE&Q Department.