



## **ANTI-BRIBERY AND CORRUPTION POLICY**

Morgan Marine Pty Ltd (MM) is committed to conducting its business and activities with integrity and all MM employees, contractors, consultants, suppliers and others representing or acting for, or on behalf of, MM are required to comply with the following objectives:

- MM will not engage in corrupt business practices;
- MM will implement measures to prevent bribery and corruption by any director, employee, contractor or other party representing MM;
- MM will, at a minimum, comply with all applicable laws, regulations and standards (including ABC Laws) or, where internal policies require a higher standard, will apply and comply with such higher standard.

### **PROHIBITION ON CORRUPT PAYMENTS**

MM prohibits bribery and corruption, in any form, whether direct or indirect, whether in the private or public sector, anywhere in the world.

Most countries have laws prohibiting bribery of private individuals and government officials. There are potentially serious consequences, including fines and imprisonment, for contravention of ABC Laws.

To this end:

- You must not offer, pay, solicit or accept bribes in any form.
- You must not engage in any form of corrupt business practice, whether for the benefit of MM, yourself or another party.
- Facilitation payments are prohibited.
- Requests for bribes or facilitation payments must be reported to the General Counsel.

Gifts and entertainment, political contributions, charitable contributions and sponsored travel have the potential to be misused as a cover for bribes or improper payments for the purpose of influencing decisions or obtaining preferential treatment. For this reason, MM has adopted special rules in relation to these types of payments to ensure openness and transparency.

Any breach of this policy is a serious matter which will be investigated and addressed by MM. Disciplinary action will be taken against anyone who breaches this policy. Matters may also, depending on the circumstances, be referred to law enforcement agencies.

This policy applies to all MM Directors, Officers, Executives, Managers, Employees and Contractors (where they are under a contractual obligation to do so).

Refer to *HSEQ Procedure COM-004 – Anti Bribery and Corruption Rules*

Andrew Morgan  
Director  
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