



Anti-Bribery and Anti-Corruption Policy

At Maritime Hydraulic we pride ourselves in being the best at what we do. The Maritime Hydraulic Way is what sets us apart from our competitors and it is important that we work to a consistently high standard in everything that we do.

Business Integrity is one of our core values and a fundamental part of the Maritime Hydraulic Way. Business Integrity covers all of our interactions with individuals, both inside and outside the company – how we secure contracts, engage with suppliers, interact with government officials, recruit and develop staff.

Our policies help to ensure that we do the right thing and we all have a part to play in ensuring we uphold the highest ethical standards.

As a company our position on bribery is simple and clear.

We do not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings anywhere in the world. Ethical behaviour is in the long term interests of the company. We are committed to a programme to counter the risk of Maritime Hydraulic being involved in bribery and we will ensure that our staff are supported through any resulting changes in policy or culture.

We are committed to the following principles:

- We will carry out business fairly, honestly and openly
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper
- We will not give or offer any money, gift, hospitality or other advantages to any foreign public official with the intention of influencing a business decision or transaction
- We will not use intermediaries or contractors for the purpose of committing acts of bribery
- We do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way

- Any employee found to be in breach of these principles may face disciplinary action
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in Maritime Hydraulic losing business
- We will avoid doing business with others who do not commit to doing business without bribery.

Facilitation payments

Facilitation payments or “grease” payments are small payments made to secure or speed up routine actions, usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. Facilitation payments are illegal under most national laws and payment could result in action being taken against the individual and the Company.

The key provisions are:

- Maritime Hydraulic prohibits personnel from making facilitation payments
- The Company has a zero retaliation policy and will never discriminate against anyone for refusing to make a facilitation payment

Suppliers

Our suppliers must adhere to the “Supplier Code of Conduct”. This requires our suppliers to adhere to our policies and in particular:

- Never take part in bribery and corruption
- Have a programme in place to prevent and detect fraud, bribery and corrupt practices
- Not offer gifts or favours to Maritime Hydraulic employees
- Conduct business through the Supply Chain Management function and not accept informal / verbal orders from any Maritime Hydraulic employee