

Oceanscan Group – Global Anti-Bribery Policy

1. Purpose

Oceanscan ("the Company") is committed to conducting its business with integrity and in compliance with all applicable anti-bribery laws and regulations worldwide. This Global groupwide Anti-Bribery Policy outlines the principles and guidelines that all employees, agents, contractors, and third parties must adhere to when conducting business on behalf of the Company. This policy is designed to prevent bribery in all its forms and uphold the highest standards of ethical conduct.

2. Applicability

This policy applies to all individuals associated with the Company, including but not limited to employees, officers, directors, agents, contractors, consultants, representatives, and third parties acting on behalf of the Company.

3. Compliance with Applicable Laws

All individuals covered by this policy must comply with all relevant anti-bribery laws and regulations in the countries in which the Company operates. This includes, but is not limited to, the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, the Singapore Prevention of Corruption Act, and other applicable national and international anti-bribery laws.

4. Prohibited Conduct

Bribery: No individual covered by this policy shall offer, promise, give, authorise, request, or receive any form of bribe or improper payment, whether directly or indirectly, to or from any person or entity.

Facilitation Payments: The Company strictly prohibits facilitation payments. No payments, regardless of size, shall be made to expedite routine governmental actions.

Gifts and Hospitality: All gifts and hospitality must be given and received in compliance with applicable laws and regulations and must not be intended or perceived as a means to gain undue advantage or influence improperly.

Political Contributions: Political contributions shall be made in compliance with applicable laws and only with the prior written approval of the Company.

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5. Due Diligence on Third Parties

Before engaging in business relationships with third parties, the Company will conduct appropriate due diligence to assess the risk of bribery and corruption associated with the third party.

6. Reporting

All individuals covered by this policy are encouraged to report any suspected or actual breaches of this policy through the Company's confidential reporting channels. The Company will thoroughly investigate all reported concerns, and individuals who report concerns in good faith will be protected against retaliation.

7. Training and Communication

The Company will provide anti-bribery training to all relevant individuals and communicate the importance of compliance with this policy.

8. Monitoring and Enforcement

The Company will monitor compliance with this policy and take appropriate disciplinary action, including termination of employment or business relationships, for any violations.

9. Review and Revision

This policy will be reviewed periodically to ensure its continued effectiveness and relevance. Any necessary revisions will be made to reflect changes in laws, regulations, or the Company's operations.

By adhering to this Global Anti-Bribery Policy, we demonstrate our commitment to ethical business practices and the prevention of bribery and corruption in all aspects of our operations.



Signed:

K.S. Hunter
Managing Director

Date: 25th January 2024