



DAVELOR SHIPS SERVICES

ANTI-CORRUPTION AND BRIBERY POLICY

Version: 1.0

Effective Date: June 2022

Approved by: Management

1. Introduction

At Davelor, integrity guides everything we do. We have a zero-tolerance policy toward corruption and bribery, committed to conducting business ethically and legally across all our operations.

2. Scope

This policy applies to all employees, contractors, partners, suppliers, and anyone acting on behalf of Davelor worldwide.

3. Policy Statement

Davelor maintains a strict zero-tolerance policy against all forms of corruption and bribery. We commit to full compliance with all relevant laws and ethical standards in every country where we operate.

4. Definitions

To help everyone understand this policy, here are key terms:

- **Corruption:** Any abuse of entrusted power for personal gain, including bribery, embezzlement, fraud, extortion, or other unethical acts.
- **Bribery:** Offering, giving, receiving, or promising anything of value, such as money, gifts, favors, or other benefits, to influence decisions or gain unfair advantage.
- **Facilitation Payments:** Small unofficial payments or gifts made to expedite routine government actions, which are prohibited.
- **Kickbacks:** Illegal payments or benefits exchanged for favorable treatment or business advantages.
- **Gifts and Hospitality:** Material benefits, entertainment, or hospitality exchanged in business, subject to policy and legal compliance.
- **Conflicts of Interest:** Situations where personal interests conflict with the responsibilities owed to Davelor or its stakeholders.

5. Gifts and Hospitality

Gifts or hospitality must never be given, promised, offered, received, or accepted with the intention of obtaining an improper business advantage or influencing business conduct inappropriately. At Davelor, all gifts and hospitality must be reasonable, lawful, and transparent.

6. When Gifts Are Permitted and Acceptable

The giving or receipt of gifts is permitted only when all the following conditions are met:

- **Intention – No Influence:** The gift is not intended to influence business decisions or secure improper advantages.
- **Compliance:** The gift complies with all applicable local laws, regulations and company policies.
- **Customary Practices:** Gifts and hospitality are nominal, customary, and consistent with ordinary business practices and local culture.
- **Non-Monetary:** Cash or cash equivalents (such as gift certificates or vouchers) are strictly prohibited.
- **Appropriateness:** Gifts should be modest, thoughtfully chosen, preferably unique and locally sourced, without appearing lavish or extravagant.
- **Limited Frequency:** Gifts are occasional and not given or received regularly.
- **Company Representation:** Gifts must be given or received on behalf of Davelor, not in an employee's personal capacity.

7. Prohibited Conduct

The following actions are strictly forbidden at Davelor:

- Offering, promising, giving, or accepting bribes or any improper benefits.
- Facilitation payments, kickbacks, extortion, and other unethical payments.
- Soliciting or accepting gifts or hospitality intended to improperly influence business decisions.

8. Employee Responsibilities

- All individuals associated with Davelor, including employees and representatives, are required to prevent, detect, and report any acts of bribery or corruption.
- Employees must fully comply with this policy and avoid any actions that could violate its principles, including those that might suggest bribery or corruption.
- Any potential conflicts or violations should be promptly reported to your manager to ensure transparency and uphold ethical conduct.

9. Reporting Concerns and Protection

We encourage open communication. Anyone who raises concerns in good faith will be supported and protected from retaliation. All reports will be treated confidentially and investigated fairly.

10. Consequences of Violations

Breaching this policy may lead to disciplinary action, including termination, and could involve legal consequences.

11. Review and Communication

This policy is reviewed regularly to stay current. Updates will be communicated clearly, and training will be provided to keep everyone informed.

12. Policy Communication

Davelor is committed to ensuring that this Anti-Corruption and Bribery Policy is clearly communicated to all employees and relevant stakeholders. The policy will be made accessible through training sessions, emails, and the company intranet. Employees are expected to acknowledge their understanding and compliance. Ongoing communication supports awareness and helps maintain a strong culture of integrity.

13. Compliance Contact

For any questions regarding this Policy or to report a concern, please contact:

Email: compliance@davelor.com

All communications will be treated confidentially.