



## **Anti - Corruption Policy**

### **COMMITMENT TO COMPLIANCE**

AHM Marine LLC and its affiliates are committed to complying with all applicable legal and statutory laws and conduct its business in accordance with a high level of honesty and integrity. These commitments and expectations are more fully set forth in AHM Marine's Business Ethics Policy (Code of Conduct).

Each director, employee and business associate of the Company is expected to act in good faith and with integrity in the performance of his or her responsibilities on behalf of the Company and in compliance with all applicable laws, rules and regulations.

All employees are expected fulfill their obligations as per the terms of employment and report any indications and instances of illegal or improper conduct by any of the stakeholders or business associates.

AHM Marine LLC shall implement procedures to ensure the Company's employees comply with the Code of Conduct as it applies to them. Any employee who does not comply with the standards set forth in this Code of Conduct may be subject to discipline in light of the nature of the violation, including termination of employment.

This policy shall be reviewed regularly and may be updated from time to time as well as communicated to all internal and external stakeholders.

### **SCOPE**

This policy statement supplements and should be read in conjunction with the rest of the Code of Conduct. This policy statement applies to all operations and stakeholders of the Company, including its customers, employees, vendors, suppliers, representatives, contractors, sub-contractors and agents, acting anywhere in the world on behalf of AHM Marine LLC.

### **POLICY AGAINST BRIBERY AND CORRUPTION**

It is the policy of AHM Marine LLC to prohibit bribery and other corrupt conduct in any form. Bribery and kickbacks involving government officials, customers, suppliers and other counterparties in the commercial marketplace are specifically prohibited.

Accordingly, neither AHM Marine LLC nor any Company Representative may, directly or indirectly, offer, promise, pay, give or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to exert



improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for AHM Marine LLC or improperly reward the recipient for past conduct.

No person subject to this policy will suffer adverse consequences for refusing to offer, promise, pay, give or authorize any such benefit, advantage or reward, even if this results in the loss of business to AHM Marine LLC.

In addition, no AHM Marine LLC director, manager, employee, agent or other representative may request, agree to receive, or accept anything of value from any other person as an inducement or reward for violating his or her duties to AHM Marine LLC or in exchange for an improper benefit.

#### • Definitions

For purposes of this policy:

- o **“Company Representative”** means any Company director, officer, manager or employee, or any agent, consultant, representative or other intermediary acting for the Company, and any supplier, vendor, distributor or teaming, alliance or joint-venture partner;
- o **“Public Official”** means any officer or employee of a government or any department, agency or instrumentality thereof, including, but not limited to, an employee of a state-owned or controlled company, an employee of a public international organization, a political party, a party official or candidate for office, and anyone working in an official capacity for or on behalf of a government or any department, agency or instrumentality thereof, as well as anyone who exercises a public function for or on behalf of a country, public agency or public enterprise. Public Officials include all levels and all ranks of government officials.
- o **“a financial or other advantage, or anything of value”** and similar references in this policy include not only cash and cash equivalents, but also gifts, entertainment, travel expenses, accommodations and anything else of tangible or intangible value; and
- o **“obtaining or retaining business or securing an improper advantage”** includes, but is not limited to, preferential treatment in a bid, a reduction in taxes or customs duties, a favorable change in regulations, tolerance of non-compliance with local rules or other favors or preferential treatment. The business to be obtained or retained or the improper advantage need not involve a contract.



#### • Examples of Prohibited Conduct

All Company Representatives are strictly prohibited at all times from:

- (a) offering, promising or giving a financial or other advantage to another person intending to:
  - (1) induce a person to improperly perform a function or activity, or
  - (2) reward a person for the improper performance of a function or activity,
  - (3) when the function or activity is either:
    - (i) of a public nature,
    - (ii) connected with a business,
    - (iii) performed in the course of a person’s employment, or
    - (iv) performed by or on behalf of a body of persons (whether corporate or unincorporated);
- (b) requesting, agreeing to receive or accepting a financial or other advantage from another person or company as:
  - (1) an inducement to perform or not perform a function or activity, or
  - (2) a reward for the improper performance (whether by the Company Representative himself or herself or another person) of a relevant function or activity,
  - (3) when the function or activity is either:
    - (i) of a public nature,
    - (ii) connected with the Company’s business,
    - (iii) performed in the course of employment or engagement by the Company or any of its affiliates, agents, representatives or business partners, or
    - (iv) performed by or on behalf of the Company or any of its affiliates, agents, representatives or business partners; or



(c) offering, promising or giving a financial or other advantage, whether directly or indirectly through a third party:

- (1) to a Public Official, or
- (2) to another person at the request or with the knowledge of a Public Official, in order to obtain or retain business and/or gain a business advantage.

• **Books and Records**

Each Company Representative shall keep and maintain books, records and accounts in reasonable detail that accurately and fairly reflect transactions in or related to the Company's business, including, but not limited to, accurately and fairly recording the purpose of any payment received or made.

The Company has adopted a system of internal accounting and operating controls and procedures to which all Company Representatives must adhere in providing financial and business transaction information in the Company's business and affairs, so that all underlying transactions are properly documented, recorded and reported.

• **Training and Communication**

All Company personnel will receive and participate in training to understand and implement the Code of Conduct. Senior management and Company Representatives will receive focused training on compliance with this policy. Such training will include, but not be limited to, an initial orientation session supplemented by reinforcement training as necessary.

• **Reporting**

If any Company Representative is asked to give or accept any financial or other advantage referred to above, becomes aware of the offering, giving, provision or acceptance of the same by a Company Representative, or has any related concern or complaint, he or she should promptly report the same to his or her supervisor, any member of management, the Human Resources or Senior Management.

**AREAS OF HEIGHTENED RISK**

• **Generally**

Known areas of heightened risk of bribery and corruption include: (i) transactions in which intermediaries, such as brokers, sales representatives, finders and agents, act between commercial parties or between those parties and the public sector;



(ii) gifts and entertainment, particularly where strong traditions of gift-giving and hospitality extend to commercial relationships. Company Representatives must be especially sensitive to these heightened risks, and refuse and report any invitation to participate in prohibited conduct.

**FACILITATION PAYMENTS**

AHM Marine LLC prohibits the payment of "Facilitating" or "Expediting" payments to Government Officials. These payments are small in value and made to expedite or secure the performance of a routine, non-discretionary governmental action that is ordinarily performed by a Government Official.

Any facilitation payments must be accurately described and documented in the appropriate accounting books and records as "facilitation payments."

**CHARITABLE AND POLITICAL CONTRIBUTIONS**

While donations to charitable organizations ordinarily are regarded as good corporate citizenship, those made to organizations in which government officials possess a role, such as trustee, cause concerns under international anti-corruption laws. The company has taken a position that a donation made to a charity associated with a government official is considered a benefit for that official.

Political parties and candidates around the world are considered government officials. Therefore, no political contributions can be offered or made on behalf of AHM Marine LLC.

Political contributions can include:

- Monetary items
- Non-monetary items (such as loaned or donated equipment, use of other corporate resources; such as: facilities, email, stationery, personnel time)

**PENALTIES AND SANCTIONS**

Violations of anti-corruption laws may result in severe fines, and imprisonment. In addition, other consequences may follow, including damage to reputation, termination of employment, career damage and legal expense.

Appropriate action will be taken by the Company against any Company Representative who violates this policy, up to and including dismissal or equivalent action.

AHM Marine LLC will not pay fines or penalties assessed against Company Representatives for the violation of anti-corruption laws.



## **LOCAL CUSTOMS AND PRACTICES**

All Company Representatives must follow this policy, even if it conflicts with local customs or practices. For example, the fact that the giving, offering or acceptance of payments, gifts, entertainment or other things of value is perceived as usual, expected or customary does not make it permissible under this policy or applicable anti-corruption laws.

## **NO EXCEPTIONS**

No Company Representative has authority to violate this policy or any applicable anti- corruption laws or to authorize anyone else to do so.

## **REVIEW AND REVISION**

This policy will be reviewed by the Senior Management annually and revised as required.

**HECTOR PATEL**  
CEO