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Approving body: Board of Directors

## Anti-Bribery and Corruption

### Purpose

Respecting and promoting anti-bribery and anti-corruption, and complying with applicable laws and regulations prohibiting activity involving bribery and corruption, is fundamental to how all Grieg Maritime Group companies conduct their business within the Grieg Group. All Grieg Maritime Group companies are committed to, and expect all Grieg Maritime Group employees to, apply high standards of business and personal ethics to detect the risks that we are exposed to with regards to bribery and corruption, and to take the necessary and proportionate measures required to deter and manage these risks.

Bribery and corruption can occur through, among other, donations, gifts, hospitality, entertainment, hiring referrals, offering employment, third parties' actions, facilitation payments, offerings, favors and other similar activities. All Grieg Maritime Group companies are committed:

- to work in an ethical, lawful, and professional manner;
- to refrain from activities that could violate, or cause any person to violate, anti-bribery and corruption laws and regulations;
- to prohibit any form of corruption and/or bribery, whether that is accepting, agreeing to accept, giving, or agreeing to give a bribe or similar activities;
- to prohibit any external party receiving or making bribes on Grieg Group companies' behalf, or (directly or indirectly) in relation to any contract to supply or work with Grieg Group companies;
- to continuously improve the anti-bribery and corruption program, including this Policy;
- to encourage raising concerns about bribery and/or corruption in good faith and without fear of reprisal;
- to thoroughly investigate reported concerns; and
- to follow through with consequences in the event of breaches of this Policy.

Therefore, all Grieg Maritime Group companies will ensure that all Grieg Maritime Group officers, directors and employees, as well as any secondees, volunteers, and contractors:

1. are aware of, understand and comply with the principles and standards of this Policy,
2. are familiar with all applicable anti-bribery and corruption laws and regulations in the jurisdictions in which they operate or perform business of any kind, and

3. refrain from engaging in any form of business or conduct whatsoever which involves or could be perceived as bribery or corruption.

## Scope

### Our approach

The board of the respective Grieg Maritime Group companies is responsible for ensuring commitment to and compliance with this Policy and applicable anti-bribery and corruption laws and regulations. The VP Legal& Compliance within Grieg Maritime Group is the ultimate responsible for ensuring that this Policy is up to date and in compliance with applicable laws and regulations.

This Policy applies to all Grieg Maritime Group companies and their subsidiaries, their officers, directors, and employees wherever located, in all countries, and irrespective of their function, grade or standing. All third parties performing work on behalf of, or when engaged in a business relationship with a Grieg Maritime Group company, including but not limited to customers, suppliers, agents, stevedores, brokers, consultants, financial institutions, and other counterparties to which a Grieg Maritime Group company provides or receives services from, are expected to apply similar effective policies on anti-bribery and corruption.

This Policy interlinks with other Grieg Maritime Group policy documents such as our Anti-Money Laundering and Counter-Terrorist Financing Policy, Ethical Guidelines, Supplier Code of Conduct, Human Rights Policy, and our grievance mechanisms. These policies outline our strong expectations to all Grieg Maritime Group companies, all GMG employees, and all third parties performing work on behalf of, or engaging in a business relationship with Grieg Maritime Group companies.

Grieg Maritime Group will continuously assess and, if necessary, amend the content of this Policy and the measures applied to minimize the risk of any breach of the prohibitions against bribery and corruption.

### Our responsibility

The management in each Grieg Maritime Group company is responsible for ensuring that this Policy is properly implemented and that all employees understand this Policy and ancillary procedures on anti-bribery and corruption. When necessary, updates shall be made, and information and training shall be provided.

The board of the respective Grieg Maritime Group company is responsible for overseeing that the respective company documents and implements measures aimed at ensuring compliance with the requirements of this Policy, which shall be described in procedures entailing among other:

1. the identification of risks of the occurrence of bribery and corruption in relation to business operations and transactions;
2. the performance of adequate controls and due diligence processes to prevent such risks of materializing; and
3. systems to ensure identification and reporting of activities that may pose such risks.
4. Ensure that all employees are aware of this policy through proper training.

All Grieg Maritime Group employees, representatives and counterparties are expected:

- to work in an ethical, lawful, and professional manner;
- to refrain from activities that could violate, or cause any person to violate, anti-bribery and corruption laws and regulations;
- to not engage in any form of bribery and/or corruption, whether that is accepting, agreeing to accept, paying, or promising to pay a bribe or similar activities;
- to prohibit any external party receiving or making bribes on Grieg Group companies' behalf;
- to encourage raising concerns about bribery and/or corruption in good faith and without fear of reprisal; and

- to raise concerns about and report any incidents of bribery and/or corruption as required by this Policy and applicable laws and regulations.

[The Grieg Group Whistleblowing channel](#) should be used to report concerns or suspicions regarding bribery and corruption. No Grieg Group officer, director or employee will experience any retribution from management or any other individual for reporting concerns or suspicions. Routines to report suspicions of bribery and corruption, or other actual or potential violations of this Policy shall be implemented.

### Consequences of non-compliance

Grieg Maritime Group fully prohibits and has zero tolerance against all activities that could violate, or cause any person to violate, anti-bribery and corruption laws and regulations. Non-compliance with this Policy and/or applicable anti-bribery and corruption laws and regulations can lead to disciplinary actions against those involved pursuant to the Grieg Maritime Group Company's disciplinary system, as well as both civil actions and criminal prosecution against those involved.

In cases of an actual or suspected breach of this Policy, Grieg Maritime Group reserves the right to conduct investigations to determine if non-compliance has occurred.

### Other references

Ethical Guidelines  
Employee Code of Conduct  
Supplier Code of Conduct