

# **Compliance Policy**

## **Anti-Bribery and Anti-Corruption Policy**

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Owner:	Seatrium Compliance	Last Revised Date:	NA
Reviewed By:	CRO	Next Review Date:	01 Oct 2025
Approved By:	Compliance Committee	Page	1 of 6

## 1 Policy

### ○ **Objective**

- 1.1 Seatrium is committed to doing the right things. Our Core Value of Integrity states our commitment to be trustworthy, accountable, principled and legally compliant in the conduct of our business. This applies wherever we operate.
- 1.2 Most countries around the world have strict anti-bribery and anti-corruption (ABAC) laws. Often, bribery and corruption are punishable by imprisonment, and if an employee of Seatrium is found to have taken part in bribery or corruption, this could expose Seatrium to civil and criminal penalties, including large fines, debarment from public tenders and reputational damage. Examples of such laws include the Prevention of Corruption Act in Singapore (Chapter 241), the Foreign Corrupt Practices Act in the United States, the Bribery Act 2010 in the United Kingdom, and laws enacted pursuant to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions adopted by member states of the Organisation for Economic Co-operation and Development (the “OECD Convention”).
- 1.3 As such, the Company will not condone any action, whether taken directly or on its behalf, that would be regarded as a bribe or a corrupt act.

### ○ **Policy Statement and Executive Summary**

- 1.4 This Anti-bribery and Anti-corruption policy extends to and cover a comprehensive framework of policies, systems and processes including but not limited to the ISO37001 Anti-bribery Management System.
- 1.5 This policy is part of a broader compliance programme and forms part of Seatrium’s compliance framework addressing anti-bribery, sanctions, human rights, amongst other compliance concerns.

## 2 Scope

This Policy applies to:

Seatrium Limited (“the Company”), its subsidiaries and associated companies where the Company or its subsidiaries have management control; and

All directors, officers and employees (including those of its subsidiaries and associated companies where the Company or its subsidiaries have

management control, wherever located (collectively referred to as “Employees” in this policy).

### **3 Definition**

“Company” means Seatrium Limited.

“Company Group” means the Company, its subsidiaries and associated companies where the Company or its subsidiaries have management control.

“Employees” means all directors, officers and employees (including those of its subsidiaries and associated companies where the Company or its subsidiaries have management control, wherever located.

“Seatrium Compliance” means Group Compliance Department of Seatrium Limited headed by Vice President, Compliance, reporting to Chief Risk Officer and accountable to Seatrium Compliance Committee.

“Seatrium Corporate Communications” means Group Corporate Communications department of Seatrium Limited head by Head Corporate Communications, reporting to Group Finance Director.

“Third Party” or “Third Parties” means any individual who is not an employee of Company Group or any entity that is not part of Company Group.

### **4 Principles**

#### **4.1 No bribes to or from Government Officials and any other Persons**

**We must be particularly mindful and exercise care when dealing with government officials. Our policy is that under no circumstances should we offer, promise, give or authorize the giving, directly, or indirectly through third parties, any bribe, kickbacks, illicit payment, or benefit in kind or any other advantage to government officials, private sector customer, supplier, contractor, or any other person or entity, as an inducement or reward for an improper performance or non-performance of a function or activity. This includes facilitation payments which is prohibited.**

We must also not under any circumstances solicit or accept, directly or indirectly, any bribe, kickback, illicit payment, benefit in kind or any other advantage from any government official, private sector customer, supplier, contractor, or any other person or entity that is intended to induce or reward an improper performance or non-performance of a function or activity.

#### 4.2 **Gifts and Hospitality**

Whilst it is recognized that the giving or receiving of gifts and hospitality may help the building of business relationships, good judgement must be exercised at all times. We should avoid giving or receiving gifts or hospitality if the same may be perceived by reasonable third parties as a bribe. All Employees should take reference from and be guided by our **Gifts and Hospitality Policy**.

#### 4.3 **Donations, Sponsorships and Contributions**

Donations, sponsorships and contributions made on behalf of a Group Company must adhere to an underlying principle to avoid any risk of actual or perceived bribery and be made only for bona fide purposes. Due Diligence should also be performed on intended recipient. The following principles should be adhered to:

- donations and contributions must always take place in a transparent manner and be documented;
- documentation must include recipient identity, purpose, reasons for donation / contribution;
- donations / contributions must comply with the laws of the country in which the donation is to be made;
- anonymous donations are prohibited;
- payments into private or personal bank accounts are prohibited.

#### 4.4 **Political Donations**

No donations or sponsorships may be made to any political party or politicians for any campaign and/or related purposes. For other bona fide and legitimate purposes, where local law permits, donations and sponsorships may be made only after advice is received from Seatrium Compliance and Seatrium Corporate Communications, with the prior written approval of Seatrium CEO.

#### 4.5 **Dealing with Third Parties**

Regulatory and broader trends have created increased legal and reputational risk for companies in respect of their third party relationships. Hence Seatrium has set out compliance due diligence requirements for third parties before and during the course of our doing business with them.

Third Party Associates/Representatives representing or acting on any Group Company's behalf are to act with integrity and refrain from paying or receiving bribes on behalf of Seatrium. Seatrium zero tolerance to bribery and corruption must be communicated to all Third Party Associates/Representatives at the outset of the business relationship, and as appropriate thereafter.

Details are set out in our **Third Party Due Diligence Policy**.

#### **4.6 Accounting and Record Keeping**

To comply with anti-bribery laws, all transactions must be properly authorized and recorded. For purposes of financial audits and to prevent improper payments being made, it is important that the books and records of each Company Group contain full and accurate information about all transactions and expenditures incurred by the Company Group.

The information documented should be such that it is possible to see exactly what was paid, to whom, the reason why it was paid, where it was paid (for example, from or to which accounts) and when. Attempts to create false or misleading records constitute misconduct, and may result in disciplinary action or termination.

Requests for approval for a payment must include adequate supporting documentation in order for the payment to be authorized.

#### **4.7 Solicitations and Extortions**

Employees must refuse to pay bribes or make corrupt payments.

Employees must report any request for a bribe to Seatrium Compliance or their Business Unit Compliance Associate as soon as practicable after the request is received. Doing so assists Seatrium in properly assessing its risks and allows the Group to plan its business in a manner that minimizes employees being put in a position of being asked to pay bribes.

Small payments to officials designed to speed approvals or delivery of routine government services to which the Company is legally entitled (and is not an official payment) is called Facilitation Payment and is a form of bribery.

If an employee makes such a payment, he or she must report the payment and the surrounding circumstances to Seatrium Compliance or their Business Unit Compliance Associate immediately. The Group will take into account prompt reporting and the circumstances surrounding such a payment in determining any disciplinary action.

It is recognized that there are situations where a personal safety payment may be made. A personal safety payment is a payment made to avoid imminent physical harm. Personal safety payments do not include payments made in response to commercial duress, or in response to threats to commercial, financial or other interests. Seatrium does not expect Employees to put their own (or their family members' or colleagues') health or safety at risk. Such request for a payment made in conjunction with a credible threat of imminent harm to employee's health or safety is extortion and should be reported immediately, where practicable, to Seatrium Compliance.

## 5 Roles and Responsibility

- 5.1 Seatrium Compliance shall be accountable to the Seatrium Compliance Committee and be responsible for the implementation of the Policy for Company Group with assistance from the relevant Business Unit Compliance Associates or other duly appointed persons.
- 5.2 All line managers are to ensure employees comply with this Policy.
- 5.3 All Employees are to comply with this Policy.

## 6 Reporting, Review and Queries

- 6.1 Employees are encouraged to report violations of this Policy in accordance with the Seatrium Whistleblower Policy. Appropriate disciplinary action, including suspension or termination of employment, will be taken in the event that an employee is found to have violated the rules of this Policy.
- 6.2 Should anyone require clarification or have any queries in relation to the rules of conduct or any other matter relating to this Policy, please contact any of the following personnel:
  - Your relevant Business Unit Compliance Associate
  - Seatrium VP Compliance
  - Seatrium Compliance email at: [compliance@seatrium.com](mailto:compliance@seatrium.com)

## 7 Distribution List

All Employees.

## 8 Linkages to Other Policies (if any):

Code of Conduct, Gifts and Hospitality Policy, Third Party Due Diligence Policy, Whistleblower Policy
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## 9 Revision History:

Version	Changes	Date	Author
1.0	Start of document control		