

ANTI BRIBERY POLICY

Maritime Cargo Services strives to undertake our business fairly with honesty and transparency. This must be reflected in every aspect of our business affairs. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings. We are also committed to implementing and enforcing effective systems to counter bribery.

This Policy Covers the Following:-

This policy applies to all individuals working at all levels within the company, including Partners, Managers, Employees (whether permanent, fixed-term or temporary), consultants, contractors and any other person providing services to us.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If Maritime Cargo Services is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery we could face an unlimited fine and, be excluded from tendering for Government contracts and face untold damage to our reputation.

What is a Bribe?

A bribe is a financial or other advantage offered or given:

To anyone to persuade them to or reward them for performing their duties improperly or:

To any Public Official with the intention of influencing the Official in the performance of his/her duties.

Hospitality and Gifts

This Policy does not prohibit giving and receiving promotional gifts (other than money) of low value and normal and appropriate hospitality which are customarily offered to others having a similar relationship with the supplier, customer or competitor. Employees should exercise good judgement in deciding whether to accept gifts of a nominal value or reasonable hospitality and should resolve all doubts and questions in favour of declining to accept the offer.

Maritime Cargo Services will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a Public Official in the performance of his/her duties



Maritime Cargo Services
Freight Forwarding Agents

Facilitation Payments

Maritime Cargo Services will not permit the establishment of accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

Donations

Maritime Cargo Services does not make contributions to any kind of political parties. No Charitable donations will be made for the purpose of gaining any commercial advantage

Record Keeping

Maritime Cargo Services will keep financial records and have appropriate financial controls in place which will evidence the business reasons for making payments to third parties.

All expense claims relating to hospitality, gifts and expenses incurred to third parties must specifically record the reason for the expenditure. In addition all accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Reporting Incidents of Bribery and Corruption

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

Monitoring

The effectiveness of this policy will be regularly reviewed by the Partners.



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