

# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

## Policy Purpose:

To drive awareness of and prevent bribery and corruption to meet the principles set out in the UK Bribery Act 2010 (the “Principles”). Full compliance with this policy ensures our reputation for ethical behaviour and fair dealing with suppliers, customers, competitors, and other stakeholders is maintained.

## Policy Scope:

This policy applies to all employees, contractors, vendors, and stakeholders who work with Hafnia. We expect all stakeholders involved in our business to conduct themselves with only the highest standards of integrity.

## Policy Statement:

- Hafnia has **Zero Tolerance for** facilitation payment or gifts of any kind unless it is done under duress.
  - Facilitation payments are defined as any exchange of goods or services to facilitate any process.
  - When making a facilitation payment under duress – it is important to notify Hafnia to safeguard Hafnia from any reputational, legal, and criminal damage.

## Our Main Objectives are to:

- Comply with all applicable laws relating to Anti-Bribery and Anti-Corruption in the jurisdictions in which we operate, and in particular with respect to the principles.
- Ensure employees have a full understanding that it is prohibited to receive or give gifts or cash, entertainment, or hospitality where the intention is to influence a business decision or operations.
  - This is inclusive of Hafnia stakeholders asking for or suggesting any gifts or entertainment items of any kind or amount from suppliers or any other entity in exchange for their services.

## In Achieving this, Compliance with the Following Must be Considered:

- The full prohibition of unofficial payments or gifts made to facilitate routine government actions (facilitation payments) where there is an intention to influence a public official in the performance of his/her official function and gain an advantage in the conduct of business. E.g., Providing cigarette cartons to port officials.

- Not giving in unless under duress – to which this must be reported to both Hafnia and to MACN
  - Hafnia prefers to pay fines or accept delays which maybe faced when rejecting bribery offers – but we are NOT prepared to give in to bribery or corruption.
    - Hafnia shall support any employee and our stakeholder who stands firm when faced with corruption and bribery that would compromise our standards.

**If persons ask for gifts or facilitation payments, this shall be reported to concerned authorities immediately.**  
**It is illegal!**