



Anti-Corruption Policy

The objective of MaritimEA's Anti-Corruption Policy is to set out the "Zero Tolerance" approach to corruption and to underline the commitment to subscribe to international best practices to meet this goal.

Key Principles

MaritimEA is committed to conducting all of its business in an honest and ethical manner. Key principles in its business are:

1. MaritimEA will not pay nor accept bribes, kickbacks, or facilitation/speed payments ("corrupt payments"), either directly or via third parties, in any circumstances. Breaches or attempted breaches of this principle by an employee will be regarded as an act of gross misconduct.
2. MaritimEA will adopt clear policies and procedures to counter corruption risk.

1. Responsible Person

MaritimEA will at all times have a director or senior personnel responsible for overseeing and reporting on the implementation of this Policy. The responsibilities of the director/senior personnel shall include:

- Ensuring proper implementation of the anti-corruption policy and procedures.
- Establish ethical culture in the business through training, guidance and mentoring.
- Remain updated on relevant legislation and international best practice standards in anti- corruption.

2. Senior management information

MaritimEA's senior management will be kept informed of the steps taken to implement the Policy, the conclusions of any reviews and any material findings arising out of the work of the responsible person.

3. Employee conduct

Employees are required to report any knowledge or suspicions of the request for, offering, giving or receiving of a corrupt payment. A failure to do so may be considered gross misconduct.

Employees will not suffer demotion, penalty or other adverse consequence for whistleblowing on practices found to be in contravention of this policy.

4. Gifts and hospitality

Employees are prohibited from accepting lavish gifts, incentives, gratuities or any gift where it could appear that their judgment or the integrity of MaritimEA is compromised.

Employees may only accept gifts which are of a nominal value or maximum monetary threshold of PKR 500. All gifts, however small, must be reported to management and recorded. Where a gift is offered but refused, this must also be reported to management.