



BESORA
SEA & PORTS - NAVITRANS COMPANY

Anti-Bribery and Corruption Framework

1. Introduction

Besora Maritima is committed to operating within the laws of any jurisdiction in which it does business, in a way that is consistent with the Besora Maritima *Goals and Values* and *Code of Conduct* and in compliance with the *U.S. Foreign Corrupt Practices Act and the UK Bribery Act*. Besora Maritima has implemented a robust framework to deter and prevent bribery and corruption. Besora Maritima's *Anti-Bribery and Corruption Policy* prohibits the actual or attempted use of any form of bribery or corruption, either directly or indirectly on Besora Maritima's behalf to advance its business interests or those of its associates. The framework and Policy are designed to safeguard Besora Maritima's reputation, consumer and business confidence.

2. Identifying and preventing bribery and corruption

2.1. Defining bribery and corruption

For the purposes of Besora Maritima's Policy, a "bribe" is anything of value given, offered, promised, accepted, requested or authorised (in each case, directly or indirectly) with the intent that a person who is trusted or expected to act in good faith or with impartiality, performs that function improperly or in order to obtain or retain an advantage in the course of business. "Corruption" is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government. Acts of bribery or corruption generally involve the undue influence of an individual in the performance of their duty, whether in the public or private sector.

2.2. Prohibition on bribery and corruption

Besora Maritima staff are not permitted to give, offer, promise, accept, request or authorize a bribe, whether directly or indirectly.

Prohibition on facilitating payments

Besora Maritima also prohibits the use of facilitating payments (payments made directly to a government official or employee for their benefit, to expedite or secure the performance of governmental action by a governmental agency), whether directly or through third parties.

3. Types of bribery and corruption

Besora Maritima's Policy identifies bribery and corruption risks in three key areas: Dealing with and through third parties; Gifts and Entertainment and Facilitating Payments.

4. Steps taken to prevent bribery and corruption

Besora Maritima has systems and controls in place to prevent bribery and corruption.

Risk assessment

These include periodic risk assessments to identify and address bribery and corruption risk and controls tailored to manage the risks identified through this process.

Policies and procedures

Bribery and corruption risks are addressed through a number of other Besora Maritima policies and procedures, including our Anti-Money Laundering and Counter-Terrorism Financing Policy, incorporating Client Identification Procedures.

Besora Maritima's *Gifts and Entertainment Policy* prohibits, and Besora Maritima staff must take reasonable steps to avoid, giving or accepting gifts and entertainment that are intended to, or may, improperly influence them or others.

Besora Maritima also maintains a *Whistleblower Policy* and framework which promotes the escalation and reporting of matters including bribery and corruption. Staff are encouraged to raise matters through line management.

Due diligence

In dealing with third parties, the Policy requires sufficient due diligence to be undertaken to ensure that they are suitable to be associated with Besora Maritima, and that appropriate controls are implemented, designed to prevent and detect bribery and corruption. This is to ensure the third parties Besora Maritima engages will not bribe or perform a corrupt act on Besora Maritima's behalf or for which Besora Maritima may be responsible or otherwise liable.

Monitoring and review

Besora Maritima performs payment monitoring, including monitoring for bribery 'red flags' and Besora Maritima's independent compliance function conducts periodic risk-based monitoring of gifts and entertainment.

Training and communication

Besora Maritima promotes staff awareness of, and compliance with the Anti-Bribery & Corruption framework through the appropriate dissemination of the Policy and procedures (including disciplinary procedures) and training on induction and periodically thereafter.

5. Disclaimer and limitation

This document is a summary of Besora Maritima's Anti-Bribery and Corruption Framework and Policy. It is not intended to create third party rights or duties or to form part of any contractual agreement between Besora Maritima and any other party.