



MMA
OFFSHORE

Anti-Bribery and Anti-Corruption Policy

MMA Offshore Limited and its wholly owned subsidiaries (**MMA**) is committed to conducting its businesses with integrity, ethically and in a lawful manner.

MMA has a zero-tolerance approach towards bribery and corrupt conduct. MMA and its personnel will not engage in any form of bribery or other corrupt conduct.

There are laws prohibiting bribery and corrupt conduct in the countries that MMA operate. Breaches of these laws have serious consequences for MMA and the personnel involved.

MMA has an Anti-Bribery and Anti-Corruption Policy (**ABC Policy**). Under the ABC Policy, MMA and its personnel will (in summary):

- Not give, offer, promise, accept or request a bribe and must not cause a bribe to be given, offered, promised or accepted by another person whether in the private or public sector.
- Not make a facilitation payment, secret commission or engage in money laundering, whether directly or indirectly through agents.
- Not offer or accept gifts, entertainment or hospitality in circumstances which could be perceived to give rise to undue influence and/or go beyond common business courtesy.
- Not offer or accept gifts, entertainment or hospitality exceeding prescribed limits (as notified from time to time) without prior approval of the appropriate Manager.
- Not offer or accept gifts, entertainment or hospitality to, or from, public or government officials or their associates without prior approval of the appropriate Manager.
- Not make political donations to any political party, politician or candidate for public office in any country unless the donation has been approved by the Board.
- Not offer or accept cash or cash equivalents (gift certificates or vouchers).
- Maintain accurate records of dealings with third parties.
- Be vigilant and report any breaches of, or suspicious behaviour related to, the ABC Policy.

This is a summary only. Full details of MMA's ABC Policy can be obtained from the Company Secretary.



David Ross
Managing Director

14 January 2020

