

## PIMMAG Anti Bribery & Corruption Policy

PIMMAG is committed to prevent all forms of bribery and corruption in business practices. The ABC and CoBE Manuals provides guidance to employees and contractors on how to deal with improper solicitation, bribery, and corruption, ensuring compliance with the law and maintaining ethical behavior.

As a non- profit making organization providing oil spill response and training services, PIMMAG shall adopt the following

- 1. No Gift Policy: Employees and their families are prohibited from receiving or giving gifts to avoid conflicts of interest, with a few exceptions (e.g., commemorative company-to-company exchanges). Gifts of cash or equivalents are strictly prohibited.
- 2. Entertainment & Corporate Hospitality: Modest hospitality is allowed for relationship-building but should not influence business decisions. Any corporate hospitality perceived as excessive or given with an intention to influence must be declined.
- 3. Political Contributions: Employees are prohibited from making any contributions on behalf of PIMMAG to political parties or candidates.
- 4. Facilitation Payments: All forms of facilitation payments to expedite routine actions are prohibited, except in life-threatening situations.
- 5. Third-Party Relations: PIMMAG requires third parties to adhere to the same standards. Due diligence is necessary to assess their ethical conduct before engaging in business.
- 6. Whistleblowing: Employees are encouraged to report any suspicion of bribery or corruption. Reports made in good faith will be protected.
- 7. Consequences: Violations may lead to dismissal, legal penalties, and damage to PIMMAG's reputation.

This policy applies to all employees, contractors, and stakeholders working on behalf of PIMMAG. Any concerns should be directed to the Admin & Finance Department for further clarification







