


Navigator shipping co		شركة الملاح للتوكيلات الملاحية		
Anti Bribery, Corruption, and Fraud Policy				
Issue Date	01/11/2022	Document No	NSC-L1-08	
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NAVIGATOR SHIPPING CO. is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented. **NAVIGATOR SHIPPING CO.** has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with our employees. **NAVIGATOR SHIPPING CO.** will constantly uphold all laws relating to anti-bribery and corruption according to Libyan laws locally and international laws abroad.

To whom does this policy apply?

This policy applies to all employees, managers, and owners of **NAVIGATOR SHIPPING CO.** , including temporary or contract employees. Employees must ensure that they do not become involved in any way in the payment of bribes or else will face the consequences of the Libyan Law.

Definitions

Bribery can be described as: giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:

- gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
- payments, whether by employees or business partners such as recruiters, labour service providers or consultants; and
- other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.

Company Commitment

All employees of **NAVIGATOR SHIPPING CO.** must adhere to the company ethos of bribery and corruption. No employee or manager will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
- Attempt to mislead or induce any person to do something illegal or which goes against the company policy.
- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- Violate any rules by shifting blame or responsibility onto another employee/person.
- Fraudulent practices against the company ethos or legislation.

NAVIGATOR SHIPPING CO. is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers, or customers/clients in any way or form. This policy hereby binds the company to its commitment to regularly discuss and remove factors related to any form of bribery, corruption, or fraudulent behaviour.

Signed:



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