



## **ANTI-BRIBERY POLICY**

MARITECH® is committed to operating with the highest level of integrity, transparency, and accountability. We take a zero-tolerance approach to bribery and corruption and expect all our stakeholders, including employees, suppliers, and partners, to uphold the same standards.

### **Purpose and Scope**

The purpose of this Anti-Bribery Policy is to:

- Define Maritech's position on bribery and corruption
- Provide clear guidance to employees and stakeholders on how to identify and address bribery risks
- Outline responsibilities and expectations in preventing bribery

This policy applies to all Maritech Group employees, contractors, officers, subsidiaries, and business partners globally.

### **Definition of Bribery**

Bribery is defined as offering, promising, giving, accepting, or soliciting an undue advantage or benefit—whether in cash or kind—with the intention of influencing the actions of an individual in a position of power. This includes:

- Facilitation payments
- Kickbacks
- Excessive gifts or hospitality
- Political or charitable contributions made with the intention of influencing a decision

### **Prohibited Conduct**

Maritech explicitly prohibits:

- Offering or accepting bribes in any form
- Engaging in any form of corrupt behavior, including facilitation payments
- Providing or receiving gifts, hospitality, or entertainment that may be perceived to influence decision-making
- Making political contributions on behalf of the company

### **Responsibilities**

All Maritech employees and stakeholders are expected to:

- Understand and comply with this policy
- Avoid any activity that might lead to a breach
- Promptly report any suspected bribery or corruption to the Compliance Office

Managers and team leaders are responsible for ensuring that anti-bribery controls are communicated and enforced within their teams.

### **Gifts, Hospitality & Donations**

While the exchange of modest gifts or hospitality may be a normal part of business relationships, Maritech has strict guidelines:

- Gifts must be of symbolic or nominal value
- Hospitality must be proportionate and reasonable
- Donations must be transparent, recorded, and never linked to business advantage

### **Due Diligence & Third Parties**

Maritech will conduct appropriate due diligence on all third parties and suppliers. Business partners are expected to:

- Share and uphold Maritech's commitment to anti-bribery
- Implement their own policies aligned with international standards
- Cooperate with Maritech in all risk assessments and audits

### **Reporting & Whistleblowing**

Suspected violations must be reported through the appropriate channels. Maritech protects whistleblowers against retaliation and ensures confidentiality.

### **Training & Awareness**

Employees will receive training and resources to understand bribery risks and the responsibilities outlined in this policy.

### **Governance, Communication & Review**

This policy:

- Is approved by the Company's Sustainability Committee
- Is developed and revised every three years, or earlier if needed, by the Corporate Governance and Sustainable Division, in cooperation with the Chief Compliance Officer
- Applies to all Business Units of Maritech Group, with relevance for employees, suppliers, and business partners
- Is communicated internally and externally and is publicly available to stakeholders
- The Company is committed to allocating the necessary resources to ensure implementation, ongoing education, and continuous improvement

For questions or to report a concern, contact: [compliance@maritechgroup.com](mailto:compliance@maritechgroup.com)

### **MARITECH GROUP HOLDING LTD**

Chen YiJie, Executive BoD member