

Gearbulk Anti-bribery and Corruption Policy

- Gearbulk prohibits any improper payments being given or received as inducements, or any gifts of value, given or received with the intention of:
 - influencing the judgement of others regarding Gearbulk;
 - gaining an improper advantage on behalf of Gearbulk, conducting business transactions or representing Gearbulk; or
 - influencing the use of authority, discretionary or otherwise, by any Government official to gain business, or business advantage.

Anti-Bribery and Corruption Compliance:

- Suppliers shall operate in compliance with Gearbulk's anti-corruption policy set out herein, and with applicable laws and regulations in the Countries in which they operate. Specifically, it is prohibited to attempt to obtain business advantage through the use of improper payments or any illegal means.
- This policy does not apply to situations where life, liberty or health of any Supplier or Gearbulk employee or their assets are jeopardised.
- Where any payments are made which are legal under local written law and normal business practice in a particular country, but which are contrary to this policy, permission should be obtained from Gearbulk.
- Suppliers are not permitted, apart from the normal course of business, to accept business gifts and courtesy's of value from individuals, their relatives or any association that does or seeks to do business Gearbulk.
- No entry shall be made into the books of accounts or supporting documents presented to Gearbulk for approval or payment which inaccurately or improperly describe any transaction or payment. However, transactions of a confidential (but proper) nature may be described in a general way provided that details are known by Gearbulk.

Any deviations from this procedure shall be immediately reported to Gearbulk.