



Anti-Bribery & Corruption Policy

James Fisher and Sons plc (“JFS”) is committed to ensuring the highest standards of legal and ethical compliance throughout JFS and all of its affiliated companies (“the JFS Group”). This includes compliance with all applicable anti-bribery and corruption laws and regulations including, but not limited to, the UK Bribery Act, the U.S. Foreign Corrupt Practices Act and the anti-bribery and corruption laws of the countries in which we operate.

Bribery is a criminal offence in most, if not all, of the countries in which the JFS Group conducts business. JFS condemns bribery and corruption in all of its forms, whether directly or indirectly, and has a zero tolerance to bribery and corruption.

This policy applies to the JFS Group, its directors and all employees and contractors working for the JFS Group at all levels and grades wherever located. Senior Management shall ensure that the requirements of this policy are incorporated within the JFS Group terms and conditions entered into with any contractors that are performing services for or on behalf of the JFS Group.

Definitions

- **Bribe:** A bribe is a financial or other advantage of any kind offered, promised or given, whether directly or indirectly, to a Government Official or any other person with the intention to induce or reward the recipient to misuse their position, improperly to perform a function or to provide an unfair business advantage.
- **Facilitation Payment:** A facilitation payment or “grease payment” is a payment, typically low value, given to a Government Official in order to expedite a routine non-discretionary task or service that the person or company making the payment is already legally entitled to receive. This does not apply to the payment of a lawful and official fee for a routine task or service.
- **Government Official:** A Government Official is any person who is paid with government funds or serves in a public function. This includes, but is not limited to, individuals who work for a local, state/provincial or national government, department or agency, any political party, party official or candidate for public office as well as employees of state-owned or controlled enterprises.

Any person to whom this policy applies, must not offer, promise, give, accept or agree to accept, whether directly or indirectly, a Bribe to or from any Government Official or any other third party, regardless of any local practices or customs. No person to whom this policy applies may give or offer a Facilitation Payment even where such payments may be permitted by local law or custom.

A demand for a payment accompanied by an imminent threat to a persons’ health or safety, such as a physical threat of violence, is extortion, not bribery. Any person to whom this policy applies faced with such a demand should, if possible, immediately contact local management or any representative of the Legal or Finance function before taking any action.

Any gifts, hospitality, sponsorships or donations offered, promised, given or accepted, directly or indirectly, must adhere to the requirements of the Anti-Bribery and Corruption Standard.

Third parties appointed to perform services for or on behalf of the JFS Group can, if not properly managed, expose the JFS Group to legal and reputational risks. All third parties must be required to comply with this policy and subjected to an appropriate level of due diligence in accordance with the Business Partner Standard.

Senior Management are ultimately responsible for the compliance with this policy in their respective businesses or functions and to ensure that all employees receive training on this policy and all related standards and procedures.

Non-compliance with this policy will not be tolerated and may result in disciplinary and other actions up to and including termination of employment or termination of a contractual relationship with third parties where applicable. Any person to whom this policy applies with knowledge of suspected misconduct, including non-compliance with this policy, must report his or her suspicions promptly in accordance with the Whistleblowing policy.

Jean Vernet
Chief Executive Officer (CEO)
1st May 2024