

ANTICORRUPTION POLICY



NIRINT
S H I P P I N G

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Our commitments

Nirint Shipping BV rejects all forms of **corruption**¹ by applying a zero-tolerance criterion regarding any breach of this policy.

In order to prevent corruption, Nirint Shipping will carry out all its activities in accordance with the legislation in force in all fields of action and in all the countries in which it operates, according to its spirit and purpose, and undertakes to:

- Not influence the will or objectivity of people outside the company to obtain any benefit or advantage through the use of unethical practices and / or contrary to applicable law.
- Not to give, promise or offer, directly or indirectly, any good of value to any natural or legal person, in order to obtain undue advantages for the company.
- Do not allow any **facilitation payment**².
- Do not use donations to conceal undue payments
- Pay special attention to those cases in which there are signs of lack of integrity of the persons or entities with which business is conducted, in order to ensure that Nirint establishes business relationships only with qualified individuals and entities with an adequate reputation.
- Reflect faithfully and adequately all actions, operations and transactions of the company in the books and records of the same.
- Any courtesy gift or gesture of kindness of Nirint towards its clients, will be done without the spirit, not the intention of committing and / or obtaining any compensation from our clients, it will only contribute to the good faith and to the strengthening of the professional relations between Nirint and its customers.

If the employees have evidence, doubts or suspicions regarding any form of corruption, they should immediately inform their hierarchical superior or the director of the company.

Nirint Shipping BV will not tolerate retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this policy.

Employees who violate these provisions will be subject to the corresponding disciplinary measures, including the termination of the contract, as well as other possible actions and / or legal sanctions. Likewise, Nirint Shipping BV reserves the right to adopt the measures it deems appropriate against **commercial partners**³ that fail to comply with it.

Nirint Shipping BV believes that complying with this policy is the responsibility of all its employees.

¹ **Corruption:** Offer, promise, grant, request or accept an unjustified benefit, for oneself or for a third party, to unduly favour another in the acquisition or sale of goods, in the contracting of services or in commercial relations.

² **Facilitation Payment:** Payment of small amounts made to lower level public officials, whose purpose is to speed up the performance of their responsibilities, such as access to public services, obtaining ordinary licenses or business permits, administrative procedures, provision of police protection or the loading and / or unloading of goods.

³ **Commercial Partners:** Partners, contractors, suppliers, agents, distributors or collaborating companies.