



CLARKSONS

ANTI-BRIBERY AND CORRUPTION (ABC) POLICY STATEMENT

V4 APRIL 2026

The Clarkson group of companies (the Group) is the world's leading provider of shipping services with breadth of expertise in ship broking, finance, research, port services and other aspects of shipping

The Group is committed to conducting its business ethically, transparently and in full compliance with all applicable anti-bribery and anti-corruption laws in every jurisdiction in which it operates.

Bribery and corruption undermine fair competition, distort markets and expose companies and individuals to serious legal, financial and reputational harm. We therefore adopt a zero tolerance approach to bribery and corruption in all forms.

PROHIBITION

The Group strictly prohibits:

- Offering, giving, promising, requesting or accepting a payment, gift or hospitality with the expectation or hope that an improper business advantage will be received, or to reward an improper business advantage already given;
- facilitation payments, kickbacks or secret commissions of any kind;
- inducing or rewarding improper performance by a public official or private counterparty;
- using third parties or intermediaries to circumvent anti bribery obligations; and
- any attempt to conceal or misrepresent payments or benefits.

These prohibitions apply whether the conduct involves public officials or private sector counterparties and whether it is undertaken directly or indirectly.

The Group prohibits “turning a blind eye” to or ignoring suspicious actions on the part of the Group’s employees or third parties.

Giving and Receiving Gifts/Entertainment

Gifts, hospitality and business expenses must be:

- reasonable, proportionate and infrequent;
- made for legitimate business purposes only; and
- compliant with applicable laws and internal procedures.

They must never be intended to influence a business decision or securing an improper advantage.

Procedure

To comply with our policy the Group maintains an ABC compliance programme that includes:

- A Group bribery and corruption risk assessment.
- Counterparty due diligence.
- On-line and in person ABC training to relevant employees.
- Resources dedicated to ABC risk management.
- Internal controls.
- Audit and oversight controls.
- A Group whistleblowing policy.

DONATIONS

The Group only makes charitable donations that are legal and ethical under local laws and practices.

PROTECTION

The Group prohibits and will not tolerate any retribution or retaliation against anyone who has, in good faith, (i) sought advice regarding prohibited conduct (ii) reported a suspicion of prohibited conduct or (iii) refused to participate in prohibited conduct.

Version control

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