

Corruption & Anti-Bribery Statement

MarineGuard Systems Limited is committed to conducting all business activities honestly, ethically and transparently. We take a zero-tolerance approach to bribery, corruption, facilitation payments, kickbacks, extortion, improper inducements and any other conduct that could undermine fair competition, responsible procurement or confidence in our services.

We comply with applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010. This statement reflects recognised bribery prevention principles, including proportionate procedures, leadership commitment, risk assessment, due diligence, communication and ongoing monitoring and review.

Scope and Application

This statement applies to all MarineGuard directors, officers, employees, workers, contractors, consultants, temporary staff, agents, representatives, suppliers, subcontractors and any other person or organisation performing services for or on behalf of MarineGuard. We expect the same high standards from all business partners and require them to act with integrity in all dealings connected with MarineGuard.

What We Mean by Bribery and Corruption

Bribery includes offering, promising, giving, requesting, agreeing to receive or accepting anything of value as an inducement or reward for improper performance, or to obtain or retain business or a business advantage. Corruption includes the abuse of entrusted power for private gain. This may involve money, gifts, hospitality, favours, employment opportunities, donations, sponsorship, confidential information, preferential treatment or any other benefit.

Our Core Commitments

- We do not offer, promise, give, request, agree to receive or accept bribes in any form.
- We do not permit facilitation payments, kickbacks or unofficial payments, regardless of local custom, urgency or commercial pressure.
- We do not use third parties to do anything that MarineGuard would not do directly.
- We compete fairly and make business decisions on legitimate commercial, technical, quality, safety and service grounds.
- We avoid conflicts of interest and disclose any personal, financial or business relationship that could influence, or appear to influence, objective decision-making.
- We only offer or accept gifts, hospitality, sponsorships or charitable contributions where they are lawful, reasonable, proportionate, transparent and not intended to improperly influence a business decision.
- We maintain accurate books, records and supporting documentation for all business transactions.
- We expect suppliers, subcontractors and other third parties to uphold equivalent ethical standards.

Gifts, Hospitality, Donations and Sponsorship

MarineGuard recognises that modest and appropriate business hospitality can help build professional relationships. However, gifts, hospitality, entertainment, charitable donations and sponsorship must never be used to influence, reward or create an expectation of favourable treatment. Any such activity must be reasonable in value and frequency, openly recorded where required, consistent with applicable law and policy, and capable of withstanding public scrutiny.

Third Parties and Supply Chain Expectations

MarineGuard may work with suppliers, subcontractors, consultants, agents and other business partners. We seek to engage third parties who share our commitment to ethical conduct. Where appropriate, we carry out proportionate due diligence, communicate our expectations, and may require contractual commitments relating to anti-bribery, anti-corruption, sanctions, modern slavery, confidentiality and responsible business conduct.

Risk Assessment and Controls

We apply a risk-based approach to bribery and corruption prevention. This includes considering risks associated with customers, suppliers, intermediaries, public officials, high-risk jurisdictions, procurement activity, tendering, project delivery, gifts and hospitality, charitable donations and any transaction that may present an increased risk of improper influence. Controls are designed to be proportionate to the nature, scale and complexity of our activities.

Records, Transparency and Financial Controls

MarineGuard requires accurate, complete and transparent records of business transactions. No accounts, invoices, expenses, payments or records may be falsified, misleading, incomplete or used to conceal improper activity. Payments must be made only for legitimate business purposes, supported by appropriate documentation and authorised in accordance with applicable approval processes.

Reporting Concerns

Anyone who has a concern about bribery, corruption or unethical conduct connected with MarineGuard is encouraged to report it promptly through their usual MarineGuard contact, line manager or an appropriate member of management. Concerns may include suspected bribery, improper gifts or hospitality, pressure to make facilitation payments, conflicts of interest, inaccurate records, suspicious third-party conduct or any attempt to conceal unethical behaviour.

Reports will be taken seriously, reviewed appropriately and handled as sensitively as possible. MarineGuard will not tolerate retaliation against anyone who raises a genuine concern in good faith, assists with a review or refuses to participate in bribery or corruption.

Responsibilities

All persons working for or on behalf of MarineGuard are responsible for acting with integrity, understanding the standards expected of them, avoiding conduct that could breach this statement and seeking guidance where they are unsure. Managers are expected to lead by example, promote ethical decision-making and ensure that concerns are escalated appropriately.



Security Through Innovation

Continuous Improvement

MarineGuard reviews its anti-bribery and anti-corruption arrangements periodically to ensure they remain appropriate to the nature, scale, complexity and risks of our business. We are committed to maintaining a culture of transparency, accountability and ethical decision-making across all areas of our operations. Where improvements are identified, we will take proportionate steps to strengthen our procedures, communication, training and monitoring.

Signed:

A handwritten signature in black ink, appearing to read "Chris Scragg".

Date of Signature: 03/07/2026

Chris Scragg – Managing Director

Review Date: 02 July 2027