

BRIBERIES, GRATUITIES AND IMPROPER PAYMENTS POLICY

It is a violation of the UAE Law for any employee of Astro Offshore Pte. Ltd. to offer or receive a bribe, gratuity or other improper payment in order to achieve a desired business result.

Providing or receiving a bribe or other improper payment may constitute an unfair business practice and therefore may be illegal.

Bribery is prohibited when dealing with any person whether they are in the public or private sector. Any questions regarding the application of this portion of the Code should be directed to Senior Management.

When dealing with vendors or representatives of any company, no employee may extend or receive a gratuity or other improper payment to influence the placement of business.

This prohibition extends to the provision or receipt of free or compensating services for which the recipient would normally incur an expense

Provision or receipt, of free services may create an actual conflict of interest and may seem inappropriate, even if completely innocent in nature

Offers of such a gratuity, or free services must be reported to Senior management immediately



Mark Humphreys
Managing Director

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