



## JMS YACHTING ANTI-CORRUPTION POLICY

### 1. Introduction

At JMS YACHTING, we are committed to conducting our business with the highest ethical standards and maintaining a zero-tolerance approach towards corruption in all its forms. This Anti-Corruption Policy outlines the principles and guidelines that all employees, contractors, and representatives of our company must adhere to in order to prevent corruption and promote transparency, integrity, and accountability.

### 2. Compliance with Laws and Regulations

All employees, contractors, and representatives of JMS YACHTING must comply with the laws and regulations of the countries in which we operate. This includes but is not limited to anti corruption laws, such as the Foreign Corrupt Practices Act (FCPA) in the United States, the UK Bribery Act, and any applicable local laws.

### 3. Prohibited Actions

The following actions are strictly prohibited and will not be tolerated:

a. **Bribery and Improper Payments:** Offering, promising, giving, or accepting bribes, kickbacks, facilitation payments, or any other improper payments to or from any individual or entity, including public officials, in order to obtain or retain business or gain an unfair advantage.

b. **Extortion and Embezzlement:** Engaging in extortion or embezzlement, which involves obtaining or misappropriating funds or assets through force, coercion, or abuse of power.

c. **Facilitation of Money Laundering:** Assisting, facilitating, or participating in any activities related to money laundering, including the conversion, transfer, or concealment of illicitly obtained funds.

**Conflicts of Interest:** Engaging in activities that create, appear to create, or have the potential to create conflicts of interest between personal interests and the interests of JMS YACHTING. Employees must disclose any actual or potential conflicts of interest promptly.

e. **Insider Trading:** Engaging in insider trading, which involves using non-public information to trade stocks or securities for personal gain or to provide such information to others for their personal gain.

f. **Improper Influence:** Attempting to improperly influence any individual, organization, or government official by using personal connections, bribes, or any other unethical means.



#### 4. Gifts, Hospitality, and Donations

a. Gifts and Hospitality: Acceptance or offering of gifts, entertainment, or hospitality must be reasonable, appropriate, and in compliance with applicable laws. Gifts or hospitality should never be used to improperly influence business decisions or gain an unfair advantage.

b. Charitable Donations and Sponsorships: Any charitable donations or sponsorships made by JMS YACHTING should be transparent, legal, and aligned with our corporate social responsibility objectives. They should not be used as a means to hide or launder illicit funds.

c. If the value of the gift, hospitality, or donation can be considered beyond reasonable or not appropriate, employees should seek prior approval from their supervisor / line manager. Authorization for acceptance should be based on legitimate business reasons and assessed for potential conflicts of interest.

#### 5. Reporting and Whistleblower Protection

a. Reporting Suspected Corruption: Any employee who suspects or becomes aware of corrupt practices, potential violations of this policy, or any unethical conduct must promptly report their concerns to their immediate supervisor, or the managing director.

b. Non-Retaliation: JMS YACHTING is committed to protecting whistleblowers from retaliation. Any individual who reports a concern in good faith will not face any adverse consequences or retaliation.

#### 6. Training and Awareness

Regular training programs will be conducted to ensure that all employees, contractors, and representatives of JMS YACHTING understand the provisions of this Anti-Corruption Policy, relevant laws, and their obligations to prevent corruption. Additionally, awareness campaigns will be implemented to promote a culture of integrity and ethics within the organization.

#### 7. Compliance Monitoring and Enforcement

a. Compliance Oversight: JMS YACHTING will establish procedures to monitor compliance with this policy, including regular reviews/audits.

##### b. Disciplinary Actions

Violations of this policy will not be tolerated and may result in disciplinary action, up to and including termination of employment or contractual relationships. Legal action may also be pursued, as appropriate.



## 8. Policy Review

This Anti-Corruption Policy will be regularly reviewed and updated to ensure its effectiveness and alignment with changing legal and business requirements.

## 9. Prohibition of Commissions from Suppliers and Contractors

- a. JMS YACHTING strictly prohibits its employees, contractors, and representatives from soliciting, accepting, or offering commissions, kickbacks, or any form of improper payments from suppliers or contractors.
- b. All procurement processes and decisions must be based on fair and objective criteria, such as quality, price, and suitability for the company's needs. Personal or financial interests should never influence supplier or contractor selection.
- c. Employees involved in procurement activities must disclose any relationships, financial interests, or affiliations that could compromise their objectivity in the selection process.
- d. Contracts and agreements with suppliers and contractors must explicitly state that commissions or kickbacks are strictly prohibited. Suppliers and contractors must be made aware of our commitment to ethical business practices and be required to adhere to the same anti-corruption standards.
- e. Regular monitoring and auditing of procurement processes will be conducted to ensure compliance with this prohibition. Any suspicions or evidence of commission-related misconduct must be reported immediately through the reporting channels outlined in Section 5.
- f. Violation of this prohibition may result in disciplinary action, termination of employment or contractual relationships, legal action, and recovery of any improperly obtained funds.

By explicitly prohibiting commissions from suppliers and contractors, we reinforce our commitment to fair and transparent business practices, and ensure that our procurement processes are conducted with integrity.

By adhering to this Anti-Corruption Policy, we demonstrate our commitment to conducting business ethically and promoting a corruption-free environment at JMS YACHTING.

Date: 13 December 2023

**Franc Jansen**  
Managing Director

**Sam Thompson**  
Commercial Director

**Rob Pijper**  
Operational Director