



## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

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[www.iconenergy.com](http://www.iconenergy.com)

The Icon Energy Group Policy on Anti-Bribery and Anti-Corruption

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## 1. INTRODUCTION AND PURPOSE

Icon Energy's corporate policy is that all its directors, officers, staff, agents or other representatives should always act in full compliance with the letter of the law, including regulations with regards to anti-corruption and bribery issues and act ethically, honestly, responsibly and diligently.

To support that policy, Icon Energy's Board of Directors (**the Board**) has implemented this anti-bribery and corruption Policy (**Policy**) as part of its corporate compliance endeavours and compliance with its regulatory obligations.

In this Policy, any reference to Icon Energy includes any subsidiary or related body corporate of Icon Energy Limited (**the Company, Icon**).

## 2. SCOPE

This Policy applies to anyone who is employed by or works at Icon, including employees (whether permanent, fixed-term, temporary or casual), contractors, consultants, suppliers, joint venture partners (where they agree to be bound by this Policy) and directors wherever located (collectively referred to as **employees** in this Policy).

## 3. WHAT IS BRIBERY AND CORRUPTION?

Bribery is an act that involves providing, causing, offering, accepting, receiving, soliciting, promising or asking for a benefit as an inducement for action in order to gain an advantage which is illegal and unethical. A bribe can take the form of gifts, loans, fees, rewards or other advantages.

Corruption involves an abuse of power for personal gain.

## 4. POLICY

### 4.1. BRIBES

Icon employees are prohibited to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

### 4.2 GIFTS AND HOSPITALITY

Icon recognises that in the course of business we develop a relationship with vendors and contractors, and at times contractors will attempt to influence our purchasing or contracting through benefits including offers of a meal, or a bottle of spirits, or tickets to an event. Icon Energy encourages such socialisation and recognises that these are normal business practices and does not discourage the acceptance of these benefits. However, these typical and normal courtesies are not to be abused or requested by our employees. The practices must also not be excessive either in frequency or value.

As a practical guideline, an employee should assess whether gifting or accepting the gift and/or benefit may:

- a) compromise, or appear to compromise, their integrity and objectivity in performing their duties; or
- b) cause, or appear to cause a conflict of interest.

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If one of the above occurs, the employee should not gift or accept the gift and/or benefit; or if unsure, discuss the action of gifting or accepting the gift and/or benefit with their manager in order to determine the appropriate action.

Employee must not accept gifts and/or benefits which exceed **four hundred dollars (\$400) per year** in estimated value, either by a single contractor or a single employee accepting those gifts with the exception being:

- c) work related conferences;
- d) invitations to speak at a professional association (including flights and accommodation);
- e) working lunches.

Acceptance of inappropriate or expensive gratuities is not permitted and will be dealt with accordingly.

If an employee feels that any gift and/or benefit is given in exchange for future or continued business with any contractor, or that a gift and/or benefit makes them feel either uncomfortable or obliged to do business with a contractor or vendor, it is their obligation as an employee of Icon to politely refuse the gift and/or benefit.

To ensure disclosure of acceptance or giving of any gifts and/or benefits (including lunches, tickets to events etc.) all employees are requested to fill out a Disclosure form of any gratuities received/given within **5 working days** of receiving/giving or being offered/offering the gift/benefit, valued at **two hundred dollars (\$200)** or more. See Schedule 1 for Disclosure form. This form must be provided to your immediate supervisor/manager. Managers must action these within **5 working days** of receiving the disclosure from the employee.

It must be noted that gifts/benefits should not be accepted on a re-occurring basis or broken down into parts of less than **two hundred dollars (\$200)**.

### **4.3 CHARITABLE AND POLITICAL DONATIONS**

The Company does not make political donations or payments in any country.

Employees are prohibited to make or offer any charitable contributions, donations or sponsorships on behalf of the Company and without prior approval from the Board. All donations above **two hundred dollars (\$200)** must be recorded on the Register of Donations and Contributions within **5 working days**.

### **4.4 FACILITATION PAYMENTS**

Facilitation payments are payments made to a public official for the purpose of speeding up routine government action. Facilitation payments either directly or indirectly through agents, contractors or intermediaries are prohibited.

## **5. RECORD-KEEPING**

All transactions discussed in this Policy and incurred by employees must be properly recorded in the appropriate Registers and/or Disclosure forms and in the Company's records within **5 working days**. The Registers and/or Disclosure forms may be subject to management review and internal or external audit.



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**SCHEDULE 1****ICON ENERGY GIFT AND ENTERTAINMENT POLICY DISCLOSURE FORM****RECEIVING GIFTS AND BENEFITS**

I have received the following gratuities, gifts or other consideration from vendors, contractors, or other service providers of Icon Energy that may financially benefit from my position at Icon Energy:

Date Received	
Name, Position & Business Department of Recipient	
Name of Giver (Who is giving you the gift)	
Description of gift	
Value \$	
Reason for acceptance	
Name and Position of Approving Manager (if applicable)	

By my signature below I understand that I am disclosing all gratuities, gifts or other consideration received from vendors, contractors or other service providers of Icon Energy that Icon Energy either does business with currently, or is associated with a business that Icon Energy could do business with in the future.

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Signed Icon Employee Name

Date: \_\_\_\_\_

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**ICON ENERGY GIFT AND ENTERTAINMENT POLICY DISCLOSURE FORM**

**OFFERING GIFTS AND BENEFITS**

I have received the following gratuities, gifts or other consideration from vendors, contractors, or other service providers of Icon Energy that may financially benefit from my position at Icon Energy:

Date Offered	
Name, Position & Business Department of Giver	
Name of Receiver (Who you are offering the gift)	
Description of gift	
Value \$	
Reason for acceptance	
Name and Position of Approving Manager (if applicable)	

By my signature below I understand that I am disclosing all gratuities, gifts or other consideration given to vendors, contractors or other service providers of Icon Energy that Icon Energy either does business with currently, or is associated with a business that Icon Energy could do business with in the future.

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Signed Icon Employee Name

Date: \_\_\_\_\_