



**SEA BIRD SERVICES INC.**  
**ANTI-BRIBERY AND CORRUPTION POLICY**

Document Number  
**SBS/QP/MW/20231204**  
Issue: 00                      Rev : 00  
Date of Issue     : Dec 2023  
Page     01 of 03

**Introduction:** Sea Bird Services is dedicated to conducting business in an honest and ethical manner and has a zero-tolerance policy against bribery and corruption. To spread this message and help our employees uphold it, we have developed this policy.

**Purpose:** To provide rules and guidelines for the company employees in order to prevent breaches of anti-bribery and corruption laws. Set out monitoring and review procedures to ensure compliance with this Policy. Urge staff members of the company to exercise caution and to report any suspicions of bribery and corruption via the available communication channels.

**Scope:** Any person or organisation that you come into contact with while working for Sea Bird Services is considered a third party under the terms of this policy. This includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, representatives, and officials of government and public bodies, as well as politicians and political parties. All employees, regardless of position or status, including senior managers, officers, directors, and workers on a temporary, fixed-term, or permanent basis, as well as consultants, contractors, trainees, seconded staff, casual workers, interns, agents, sponsors, and anyone else connected to Sea Bird Services or any of our subsidiaries or our agent's staff worldwide, are covered by this policy.  
The policy covers the words and expressions listed below  
Bribery and Corruption

**Bribery:** The act of offering, promising, granting, accepting, or soliciting an advantage in exchange for committing an illegal or immoral act that undermines the public's confidence in a company is known as "bribery."

**Corruption:** Is the abuse of entrusted power for private gain

**Bribery and corruption can take many forms, including the provision or acceptance of:**

- (1) Political Contributions
- (2) Charitable Contributions and Sponsorships
- (3) Facilitation Payments
- (4) Gifts and Hospitality

**Political Contributions:** Political contributions are monetary or non-monetary support for political parties, individual politicians or political candidates. Non-monetary support includes loans or donations of equipment, free technical services including the Employees donating their time during working hours.  
The Company has adopted a policy of political neutrality and generally does not make political contributions.

**Charitable Contributions and Sponsorships:** As part of Sea Bird Services commitment to corporate social responsibility, the company donates to charitable entities in a way that promote goodwill and a positive public image. These contributions can take the form of direct financial assistance or in-kind services (like knowledge and time donations), and they are made without regard to or expectation of a profit. In contrast to charitable contributions, sponsorships give the company a platform to advertise its products and services. Sponsorship can take many different forms, including funding for education, the arts, and cultural events. The Workers have to take care to make sure that sponsorship and charitable donations aren't used as a front for bribery and are made in compliance with the relevant laws.



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Page     02 of 03

**Facilitation Payments:** Facilitation (or “grease”) payments are small bribes made to government officials to secure or expedite routine or necessary actions which they are already required to perform. It is the Company’s policy not to make any facilitation payments. Facilitation payments can only be made in exceptional circumstances where the Employees face the threat of physical harm or believe that their lives are in danger. Such payments must be documented in writing and submitted to the Compliance Department for review. Finally, the purpose and nature of these payments must be accurately recorded in the Company’s books and records.

**Gifts and Hospitality:** The Company understands the importance of establishing positive connections with business partners is vital to its ongoing success. Exchanging gifts and/or offering and accepting hospitality with other people is not forbidden provided the following conditions are met:

- a. It is not made with the intention of influencing, including or rewarding a third party.
- b. It is not given in order to gain any advantage through improper performance, or in explicit
- c. It is not given for an implicit exchange for favors or benefits.
- d. It does not violate any relevant laws.
- e. It is given in the Company’s name, not the Employees’ name.
- f. It does not include cash or a cash equivalent (such as gift certificates or vouchers)
- g. It is appropriate in the circumstances. For example, it is customary for small gifts to be given or received at New Year Festival.
- h. It is an appropriate type and value, and given at an appropriate time. For example,
- i. if a business partner is engaged in a tendering process, the Employees must not give gifts and/or hospitality to that business partner;
- j. It is given or received openly, not secretly.
- k. The Employees shall avoid keeping small gifts provided for seasonal celebration or in traditional and cultural practice and shall comply with the Company’s Regulation

**Procedure:**

**Employee Responsibility:** All company employees must uphold this Policy when performing their duties and shall communicate to their subordinates regarding the principles of Anti-Bribery and Corruption Policy. Anyone who has any query concerning this Policy shall raise the question to his/her superior. In the case that anyone discovers or suspects violations of this Policy, he/she must immediately report them through either his/her superior or one of the channels established under the Company’s Whistle-blowing Policy

**Record Keeping:**

Sea Bord Services policy is to follow the applicable standards, principles and laws for accounting and financial reporting. All expenditure must be supported by documents. The retention and archiving of the Company’s records must comply with all applicable laws and regulations. No accounts must be kept “off-book” to facilitate or conceal improper payments. False, misleading, incomplete, inaccurate, or artificial entries in the Company’s books, records or accounts are prohibited.



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Page     03 of 03

- Protection:** Even if this means that Sea Bird Services loses current business or is unable to secure new business, the company is committed to making sure that no Employee will face a demotion, other unfavourable consequences, or penalty for refusing to pay bribes. Sea Bird Services is sure that enforcing a zero-tolerance policy against bribery and corruption will benefit its operations in the long run. Additionally, Sea Birds Services will not put up with any behaviour on the part of any employee that tries to intimidate, harass, or otherwise discourage someone who is determined to follow this policy. Employees should notify their direct line manager right away if they feel that they have been treated unfairly as a result of adhering to this policy.
- Training and Communication:** Sea Bird Services constantly provides anti-bribery and corruption training to all of its employees on a regular basis to raise awareness of this Policy, in particular the different types of bribery, the risks of engaging in bribery and corruption, and how to report any suspicious activity. Each one of the Employees will receive a copy of this Policy and be advised that it can also be found on the Company's website [www.seabird.com.eg](http://www.seabird.com.eg). The Employees will be informed whenever significant changes are made to this Policy. Training regarding to this Policy is a part of the Employees' orientation before start working in the Company.
- Responsibility:** The Chairman has delegated responsibility to the Compliance Department for overseeing this Policy and its programme to ensure compliance with legal and ethical obligations. The Compliance Department has the primary responsibility for implementing this Policy and monitoring its effectiveness as well as handling any queries about interpretation. All members of management are responsible for ensuring that everyone who reports to them has made aware of and understands this Policy through adequate and regular training sessions.
- Policy Violators:** The Employees who fail to comply with this Policy, including line supervisor or line manager who ignore misconduct or are aware of misconduct but fail to deal with it, will be subject to disciplinary action up to and including termination of employment. Ignorance of this Policy and/or local laws is not an excuse for failure to comply. Any agent, intermediary, supplier or contractor who violates the terms of this Policy, or knows of and fails to report potential violations to the Company's management, or misleads investigators over potential violations, will face contract termination.

**Approved and Revised By:**  
**Mr. Ahmed M. Youssef**

**Vice President**  
**Sea Bird Services**