

ANTI BRIBERY/CORRUPTION POLICY

Surya Nautika Sdn. Bhd is committed to the highest standard of integrity, openness, and accountability in the conduct of its business and operations. It aspires to conduct its affairs in an ethical, responsible, and transparent manner. FSM has adopted a zero-tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts.

This policy applies to all employees of Surya Nautika Sdn Bhd and its subsidiary/sister companies (“Fast ship Management Sdn Bhd” and “Swordfish Marine Sdn Bhd”), including employees on contract employment, temporary employment or short-term, internship and secondment employees.

This policy is to provide avenues for all employees to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees who report such allegations.

All employees are required to adhere to this policy to avoid giving any impression conflict of interest between Companies and external parties which may tarnish the company’s reputation. It is the responsibility of all employees to professionally inform external parties involved in any business dealings with FSM and its sister companies that the company practices the Anti Bribery/Corruption Policy.

Bribery may take the form exchange of money, goods, services, property, privilege, employment position or preferential treatment. Employees shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organization, either for the benefit of the Company or the person involved in the transaction.

No Employee will suffer demotion, penalty, or other adverse consequences for refusing to pay or receive bribes or other illicit behavior, even if such refusal may result in the company losing business or experiencing a delay in business operations.