



LLOYD'S Agency

INTERSERVICES S.A.



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INTERSERVICES S.A.
P&I Correspondents
Lloyd's Agents
VHT Average Agents
AIMU Correspondents

**Policy against Bribery, Corruption and Proceeds of Crime, including Money
Laundering**

Version 2 Revision 3

PREAMBLE

Interservices S.A. is a well-established fully privately owned company, founded in 1990, to provide insurance related services as P&I Correspondents, average/survey agents, claims settling agents and consultants appointed by and acting upon instructions of P&I Clubs, Lloyd's Agency Department, Verein Hanseatischer Transportversicherer e.V., American Institute of Marine Underwriters and leading companies on the international insurance market.

Interservices S.A. is currently acting from three Romanian offices at Bucharest, Constantza and Galatz as P&I Correspondents for all the Clubs in the International Group in all Romanian Black Sea Ports and

Operator de date cu caracter personal nr. 26888

Datele personale sunt prelucrate de catre Interservices S.A. in conformitate cu dispozitiile Legii nr. 677/2001 si normelor legale conexe, in cadrul activitatii societatii autorizata prin lege. Dreptul de acces, de interventie si de opozitie in conditiile prevazute de Legea nr. 677/2001 se exercita printr-o cerere scrisa, data si semnata, transmisa pe adresa societatii.

Personal data operator no. 26888

Personal data are processed by Interservices S.A., within its scope of activity as authorized by the statutes, in accordance with the provisions of the Law no. 677/2001 and interfacing legislation. The right of access, intervention and opposition provided by the Law 677/2001 shall be used through a written, dated and signed application, sent to the company's registered premises.

Bucharest Constantza Galatz

Company certified ISO 9001:2015



Danube River Ports, and as Lloyd's Agents at Bucharest, Average Agents of Verein Hanseatischer Transportversicherer e.V. and Correspondents of The American Institute of Marine Underwriters.

The company is the founder of the Romanian Association of Maritime Consultants and Average Agents and a member of European P&I Correspondents Group (EPIC), a strong, quality-oriented and professional group of European based P&I Correspondents, insurance and claims consultants.

Interservices S.A. recently celebrated 27 years of operation, becoming a brand name in the region through the professionalism of its staff members and the company's name and logo is a trademark for the company's core competencies under the protection of OSIM - The State Office for Inventions and Marks.

INTERSERVICES S.A.'S POLICY AGAINST BRIBERY, CORRUPTION AND PROCEEDS OF CRIME, INCLUDING MONEY LAUNDERING STATEMENT

Interservices S.A. is fully committed to applying the highest standards of ethical conduct and integrity in its business activities.

The company is constantly concerned with the quality improvement of the services and every individual, regardless of whether a staff member or not, and/or any other third-party, acting on Interservices S.A.'s instructions, is responsible for maintaining our reputation and good standing and for conducting the job assigned to them honestly and professionally.

Interservices S.A.'s policy has been, as from the inception of company's activity, to take a zero-tolerance approach to bribery, corruption, money laundering and/or any other illicit way of conducting business, with absolutely no derogation whatsoever.

Implementation of our Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering is made at the individual level by Interservices S.A.'s standard terms and conditions of employment and/or hiring third-party service providers.

SCOPE

This policy applies to all company's shareholders, directors, managers, senior officers, staff members, irrespective of seniority, trainees, and it also extends to all and any third-party service providers,

either consultants, lawyers, experts or surveyors engaged by Interservices S.A. in the course of its business and activity.

Interservices S.A.'s appointed Compliance Officer along with the Quality Manager, as the management representatives, have defined authority to maintain, verify and report on any irregularity or deviation from the company's Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering principles.

All Interservices S.A.'s personnel confirm that they have read and understood the policy and that they fully comply with the same and at all times.

All Interservices S.A.'s personnel are bound to ensure that any service providers engaged by the company in relation to any matter pertaining to Interservices S.A.'s business and activity are aware of and understand company's Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering and strictly abide by it.

LEGISLATION AND GUIDELINES

Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering has been set out on basis of, but not limited to, the following legislation and guidelines:

- The Bribery Act 2010 (c. 23) (United Kingdom)
- The United Kingdom Proceeds of Crime Act 2002 (POCA)
- Foreign Corrupt Practices Act of 1977 (FCPA) (United States)
- German Penal Code
- German Anti-Corruption Law
- German Administrative Offences Act
- Federal Law of the Russian Federation No. 273-FZ dated December 25, 2008 on Combating Corruption
- Anti-Unfair Competition Law of the People's Republic of China
- Criminal Law of the People's Republic of China
- United Nations Convention against Corruption
- Council Decision of 25 September 2008 on the conclusion, on behalf of the European Community, of the United Nations Convention against Corruption (2008/801/EC)
- Law no. 78 of 8 May 2000 for the prevention, discovery and sanctioning of corruption (Romania)

- Romanian Criminal Code, in particular the provisions of Chapter I - Art. 289-294, Chapter II - Art. 295-309
- Law no. 656 of 7 December 2002 for the prevention and sanctioning of money laundering and for establishing of certain measures for the prevention and combating terrorism financing
- Lloyd's Agency Department service level requirements to Lloyd's Agents (Lloyd's Agency Department compliance and regulatory requirement)
- International Group Guidelines for Correspondents 2015 (27 October 2015)
- Guidelines of individual leading companies on the international insurance market

Substantive law relevant to bribery, corruption and money laundering matters as well as Principals' policies are constantly under review by the Compliance Officer and company's legal department, any amendments, corrections and/or changes thereto being promptly incorporated in Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering and circulated to all employees and associated persons.

A copy of the up to date policy is also accessible on our company's website: www.mancas.ro.

DEFINITIONS

Legal definitions of bribery, corruption and money laundering of legislation referred to and/or applying to Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering prevail.

The significance of words and phrases used in Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering is the following:

Bribery and corruption

Bribery is a specific offence which concerns the practice of offering something, usually money, to gain an illicit advantage and corruption is an abuse of a position of trust in order to gain an undue advantage.

Corruption is the misuse of power by someone to whom it has been entrusted, for his own private gain, the most common form of corruption being bribery.

The notions of bribery and corruption are frequently used in practice in an interchangeable manner.

The anti-corruption laws prohibit an offer, payment, promise to pay or authorisation of payment of any money, gift, or anything of value to any government official for purposes of:

- influencing any act or decision of the government official,
- inducing him or her to do any act in violation of his or her lawful duties,
- securing an improper advantage, or
- inducing him or her to use his or her influence with a governmental agency,

in order to assist in obtaining or retaining business or to direct business to anyone.

In addition, according to the laws in force in certain countries, such as those that have ratified the Criminal Law Convention on Corruption of the Council of Europe, also known as "Treaty no. 173", even the act of corrupting someone, without the actual payment of a bribe, in order to induce him or her to act or refrain from acting in the exercise of his or her functions is considered a criminal offence.

Money laundering

Money laundering is a specific offence which may consist of:

(i) the conversion or transfer of things, knowing that the same were obtained from a criminal offence, for the purpose of concealing or disguising the illicit origin of the said things or for the purpose of assisting the person who committed the criminal offence from which the things were obtained to evade criminal investigation, judgement and punishment,

(ii) the concealment or disguise of the true nature of the origin, location, disposition, movement or ownership of the things or rights thereon, knowing that the things were obtained from a criminal offence,

(iii) the acquisition, possession or use of things, knowing, that the same were obtained from a criminal offence.

The word "things" should be taken to mean under the Law no. 656 of 7 December 2002 for the prevention and sanctioning of money laundering and for establishing of certain measures for the prevention and combating terrorism financing, corporeal or incorporeal things, movables or immovables, as well as juridical acts or documents which attest a title or right with regard to these things.

The attempt / intention to commit a crime is also punished.

Associated person

In accordance with the applicable provisions and for the purpose of this policy, an "associated person" should be taken to mean any natural person, company, any other organization or legal entity that performs a service upon the instructions of or mandate given to them by Interservices S.A.

Facilitation payments

Facilitation payments, also known as "grease payments", are low value payments designed to speed up routine government actions.

In other words, facilitation payments are used to persuade government officials to do a task that they are already bound to do.

The applicable legislation does not recognize the legality of facilitating payments and does not draw any distinction from bribes.

Conflict of interests

A conflict of interests is a set of circumstances that creates a risk that professional judgement or actions regarding a primary interest will be unduly influenced by a secondary interest and undermine the impartiality.

PROCEDURAL MATTERS

General prohibition

All forms of bribery and corruption, including the promise to give a bribe or agreeing to receive one and equally the promise and/or undertaking, to anyone, to procure an advantage of any sort for obscure and illicit purposes aiming to result in a personal and/or for the company's benefit, or any other offences are strictly prohibited within Interservices S.A.

Bribery is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general application.

Failure to comply with this policy will immediately lead to disciplinary actions, including termination of employment, and legal sanctions for violation of company's Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering.

Corporate hospitality

Utmost care must be exercised to ensure that such hospitality is not disproportionate and/or unreasonable, and in breach of Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering and/or the applicable legislation.

Customary hospitality gestures and promotional or other reasonable and bona fide business expenditure seeking to friendly promote the company's image are acceptable and will not be viewed as bribery in most of the jurisdictions subject to certain conditions.

Interservices S.A. keeps accurate financial records that reflect all transactions and asset dispositions, in accordance with the applicable law provisions and statutory requirements.

Facilitation payments

All facilitation payments are prohibited.

Any request for a facilitation payment should be reported to the company's Compliance Officer and/or company's senior management immediately.

Company's senior management and/or the Compliance Officer should be also informed promptly when there is any degree of uncertainty in relation to a demand for a payment that could potentially disguise a facilitation payment.

Dealing with public officials

Although this policy applies to both public and private sectors, dealing with public officials poses a particularly high risk in relation to bribery due to strict rules and regulations in many countries.

Public officials include those in government departments, but also employees of government owned or controlled commercial enterprises, international organisations, political parties and political candidates.

The provision of money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their official capacity is prohibited.

Conflict of interests

All company employees must avoid situations or transactions in which their personal interests, either direct or indirect, could conflict or might be seen to be in conflict with the interests of the company, such as, but no limited to:

- acting on any client information, obtained through their employment with the company, for personal gain;
- passing such information to a third party;
- acting in any way that could be construed as and/or fall within the concept of "insider trading".

Disclosure of any personal actual or potential conflict of interests is mandatory for all employees regardless of rank or seniority.

The matters associated with a conflict of interests or a potential conflict of interests in relation to the assignments commissioned to Interservices S.A. will be dealt with on a case basis and in accordance with Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering, Interservices S.A.'s Standard Terms and Conditions for Survey and Consultancy, standing instructions, guidelines and requirements of Interservices S.A.'s Principals and customers.

Standard / minimum due diligence measures

All company employees and specifically but not necessarily limited to those having an assignment relating to establishing business relationships or carrying out bank transactions, must exercise the appropriate caution when dealing with business partners, as under:

- (i) when establishing a business relationship,
- (ii) when carrying out any bank transactions,

(iii) when there are any suspicions that the transaction is intended for money laundering or terrorism financing, regardless of the amount involved in the transaction,

(iv) when there are any doubts about the truthfulness or adequacy of previously obtained customer identification data.

The aforesaid measures should reasonably extend to subcontractors and/ or third-party service providers instructed by Interservices S.A.

Compliance

It is the responsibility of each and every individual in Interservices S.A. to ensure compliance with this policy and each has an obligation to act with integrity and to ensure that this policy is properly understood and observed.

The ultimate responsibility for compliance with this policy throughout the company is taken by the company's senior management and its designated Compliance Officer.

Training will be provided to new employees to support them in complying with their responsibilities, strictly in line with the company's Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering.

Reporting

Whistleblowing is encouraged when it serves to report a crime or the intention to commit a crime.

All Interservices S.A.'s personnel as well as all and any associated persons have the responsibility and obligation to prevent, detect and report any bribery and/or money laundering and/or suspicion of or attempted bribery and/or money laundering.

Interservices S.A. is fully committed to ensuring that its employees can speak up openly if they have any concerns or suspect or observe anything that might be in breach of this policy.

Any matter under this policy should be reported promptly to the company's designated Compliance Officer and/or senior management or in their absence to the company's designated Quality Manager.

All reports will be treated confidentially and there will be no adverse consequences under any circumstances.

Summary

The company and its employees are:

- prohibited from offering, promising or paying a bribe of any nature, whatsoever;
- prohibited from soliciting, accepting or receiving a bribe of any nature, whatsoever;
- prohibited to promise and/or undertake, to anyone, to procure an advantage of any sort for obscure and illicit purposes aiming to result in a personal and/or for the company's benefit;
- prohibited from giving or offering anything of value to a public official;
- required to comply with the company's policy and procedures in relation to gifts and hospitality;
- prohibited from making facilitation payments;
- required to comply with the company's policy and procedures in relation to conflict of interests;
- required to comply with company's minimum / standard due diligence measures relating to business partners in view of preventing company's indirect involvement or exposure to criminal activities;
- required to ensure observance of the Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering and procedures by all and any associated persons.

Auditing and revisions

Interservices S.A.'s Policy against Bribery, Corruption and Proceeds of Crime, including Money Laundering, as well as the company's bribery prevention is subject to continuous review and updating, with a mandatory revision on a yearly basis.

Latest mandatory revision: June 2017

Occasional revision: August 2017

Next mandatory revision: June 2018

Bucharest Constantza Galatz

Company certified **ISO 9001:2015**



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