



2.9 Ethics, Anti-Bribery & Corruption Policy

1 Purpose

Corruption is the abuse of entrusted power for private gain. It includes bribery, extortion, kickbacks, facilitation payments, fraud, conflicts of interest, and any improper advantage.

Olympic maintains a strict zero-tolerance approach to bribery and corruption in all forms. We are committed to conducting business ethically, transparently, and in compliance with applicable laws and international standards. This Policy establishes the principles and requirements for preventing, detecting, and responding to bribery and corruption risks across our operations and value chain.

Olympic's approach to anti-bribery and corruption is guided by the United Nations Convention against Corruption (UNCAC), the UN Global Compact's Ten Principles (Principle 10: Anti-Corruption), and the OECD Guidelines for Multinational Enterprises.

This Policy is supported by Olympic's:

- Code of conduct
- Anti-corruption programme
- Whistleblowing routine
- Relevant internal procedures and controls

2 Scope

This Policy applies to all persons engaged in any Olympic activity or present on Olympic premises or vessels.

3 Statement, principles & commitments

- **Compliance:** We comply with all applicable laws and regulations, including anti-bribery and corruption laws and related regulations such as anti-money laundering, competition, and tax laws. We ensure that employees and relevant business partners are aware of and adhere to our anti-corruption principles.
- **Integrity:** We will conduct our business activities fairly, honestly and transparently in all transactions and relationships. We do not use intermediaries or third parties to circumvent anti-corruption obligations, to offer or receive bribes or other undue benefits.
- **Zero Tolerance:** We prohibit bribery and corruption in all forms, including extortion, kickbacks, and facilitation payments. We will not offer, promise, give, request, or accept any improper advantage, directly or indirectly.
- **Facilitation Payments:** All facilitation payments are prohibited and must be refused and reported in accordance with Olympic procedures.
- **Business Partners And Third Parties:** We seek to work with business partners who share our commitment to integrity and conduct risk-based integrity due diligence on relevant third parties to identify, assess, and mitigate risks.
- **Conflicts Of Interest:** Employees must avoid, disclose, and properly manage conflicts of interest. A conflict arises when personal, financial, or family interests could influence, or appear to influence, professional judgement.
- **Political And Charitable Contributions:** Olympic does not make political or charitable contributions intended to obtain or retain business advantage. Any political contributions must be lawful, transparent, approved at the appropriate level, and made only to registered organizations. Sponsorships and charitable contributions must have a legitimate purpose and must never be used to conceal bribery.
- **Lobbying:** Any lobbying activity must be lawful, transparent, ethically conducted, and appropriately approved, documented, and disclosed in accordance with applicable requirements.
- **Gifts And Hospitality:** Gifts and hospitality must be modest, infrequent, transparent, and never intended to influence a business decision nor be perceived as intended to influence a decision. High-value, frequent, or inappropriate gifts or hospitality are prohibited.
- **Company Funds And Records:** We prohibit any misuse of company funds or records to conceal corruption and maintain transparent books and accounts.
- **Whistleblowing:** Reports can be made via the TMS system, directly to managers, Masters or the DPA, or through an external encrypted and anonymous reporting channel on Olympic's website. Reports are handled confidentially and without risk of retaliation.

Fosnavåg, 22.05.2026

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