



*E. Durán Shipping P&I Services, S.L.*  
*Consignatarios - Shipping Agents*

# **POLICY FOR THE MANAGEMENT OF FRAUD, BRIBERY AND ANTICORRUPTION RISKS**

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## **1 Objective**

Estanislao Durán Shipping P&I Services, S.L (Hereafter, E. Durán) wants to reaffirm its “**zero tolerance**” position against Fraud, Bribery and Corruption, and its commitment to the compliance of all laws and rules concerning fraud, anticorruption and antibribery that apply to our organisation. For this reason, we seek permanently the implementation of the best practices against materialisation of these practices, in all the markets we operate in.

## **2 Scope**

This procedure applies to all Employees, Administrators, shareholders, Directors, Suppliers and Third Parties associated to E. Durán.

## **3 Refusal of conducts related to Corruption, Fraud and Antibribery**

### **3.1 Relations with its Stakeholders**

In its relations with its clients, suppliers, public organisations, and rest of third parties, E. Durán:

- Refrain from participating in any form of Fraud, Bribery or practice of Corruption, both directly and indirectly.
- Take the necessary measures to fight any way or type of Fraud, Bribery and Corruption
- Promotes and establishes within the whole Company, an institutional antifraud, antibribery and anticorruption culture.
- Does not tolerate that its Shareholders, Administrators, Directors, Employees, Suppliers and associated Third Parties, obtain economic, commercial or other kind of gains, by violating laws or acting in a dishonest way.
- Has rules of conduct as to prevent promotion of any way of Fraud, Bribery and Corruption, and manage properly the award and reception of gifts, stated in the Ethical Norm. Such alignments and rules of conduct are understood as incorporated to this Policy.
- Does not maintain links nor ties with Employees, Administrators, Directors, Suppliers or associated Third Parties who have been condemned for criminal activities related to Fraud, Bribery and Corruption.

### **3.2 Facilitation Payments**

It is understood as facilitation payment every illegal or non-official payment made in exchange for services with the purpose of ensuring or speeding procedures or actions. Typically, these payments are identified with payments made to civil servants. For that matter:

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- No employee of E. Durán is authorised to make facilitation payments, and the only payments which are authorised are those planned during the performance of the organisation's activity, which are in accordance with the laws in force and do not generate conflicts with this Policy.

### **3.3 Gifts**

- Does not admit, explicitly, that gifts or entertaining articles are offered, in exchange for a favourable treatment, or with the aim of achieving a commercial advantage.
- For the same reason, in case of receiving or be willing to offer any kind of gift or hospitality, provisions of the Ethical Norm 5.3 of E. Durán must be observed.

## **4 Supervision and Control**

Executives are responsible to develop the necessary actions so that this Policy is adopted by the branches and subsidiaries of E. Durán.

Consequently, the responsibility of achieving the objectives of this Policy falls on:

- Compliance Officer
- Sole Administrator
- Directors
- Deputy Directors
- Internal Audit

For that reason, E. Durán has a Compliance Officer within its organisation, who performs his/her duties in an independent way, having as functions, among others, ensuring the compliance of this Policy, as well as to prevent and avoid that conducts of fraud, corruption and/or bribery could materialise within the organisation.

Accordingly, as to supervise E. Durán's antibribery management system properly, the relevant procedures have been internally developed implemented, with the purpose of:

- Generating a transparency environment, integrating different systems developed for prevention, detection and response to Fraud, Bribery and Corruption, maintaining the appropriate channels as to foster communication of these issues within the Company, coordinating the set of necessary actions to prevent, detect and respond to potential situations of Fraud, Bribery and Corruption.



- Prioritising the activities of prevention of Fraud, Bribery and Corruption, holding the necessary efforts focused on detection and correction of situations related to them.
- Has guidelines and methodologies as to segment, identify, measure, control, and monitor factors of risk of Fraud, Bribery and Corruption, as well as its associated corporate risks.
- Has procedures with the purpose of bounding Employees, Administrators, Directors and associated Third Parties.
- Evaluates signs of alleged acts of Fraud, Bribery or Corruption, under the principles of confidentiality, integrity, transparency, objectivity, independence, and autonomy of the persons responsible for evaluations.

## **5 Communication of inappropriate conducts**

E. Durán promotes and understands as a positive conduct, the communication and/or approaches, always in good faith, about conducts that could be against policies and management systems for the prevention, detection and response to Fraud, Bribery and Corruption.

For that reason, in case of doubts about the qualification of a conduct regarding this document, and/or willingness to communicate how to act towards any sign, suspicion or knowledge about a breach of this policy, you can contact our Compliance Officer.

In this sense, we have a Whistleblower Channel where claims for breaches concerning the Plan for Preventing Criminal Acts and the Ethical Norm are received, including those related to incorrect acts related to Fraud, Bribery and Corruption.

We manage opportunely all the claims of acts concerning Fraud, Bribery and Corruption, regardless of its amount or staff involved, guaranteeing confidentiality, objectivity, respect, and transparency.

E. Durán shall ensure the compliance of what the Procedure of the Whistleblower Channel states, guaranteeing the rights of users and the absence of retaliation because of preventing, refusing, or denouncing an act of this nature.

## **6 Update**

This Policy must be updated following the recommendation of the Steering Committee, Governance Body, and must be approved by A. E. Durán's President.



This policy will be revised through internal audits conducted in the organisation, and from the improvement opportunities detected in those audit revisions, this policy will be revised, and the relevant modifications will be proposed.

Anyway, this update will be made in accordance with the result of the antibribery goals set by the Company on a regular basis. In these goals will be expressly mentioned, as a minimum, actions included in the improvement plan, terms established for their achievement, the positions responsible for their achievement and resources assigned to that.

## **7 Communication and Dissemination**

Taking into consideration that this policy has a significative impact over third parties and shareholders, once approved by E. Durán's Sole Administrator, it must be published on the website, and its compliance is enforceable for all persons participating in the organisation's activity.

Non-compliance of the provisions included in this document shall involve application of measures envisaged in the corporation's internal rules.

Any modification made to this Policy must have the same level of dissemination.

Vigo, 15<sup>th</sup> December 2023

Ramiro José Cobo García - Cobo