





MARITIME SUPPORT SERVICES LIMITED

Title:	Interaction with Representatives of Government Agencies	Procedures No:	MSSL 019
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Interaction with officials and employees of governments to ensure the promotion of Maritime Support Services Limited's interests is the responsibility of the MD/CEO. All contacts with elected officials and employees of governments, other than in the ordinary course of business, should be coordinated through Maritime Support Services Limited's Managing Director/CEO.

It is Maritime Support Services Limited's business practice to maintain cordial and harmonious relations with officials and employees of governments at various levels. Although Maritime Support Services Limited encourages such relations, it is absolutely essential that they comply with legislation and Maritime Support Services Limited policies and that they preserve the integrity and the appearance of integrity of Maritime Support Services Limited and its representatives on one hand, and that of the officials and employees of governments on the other.

1. under Nigerian law, the offer and acceptance by an elected representative or government employee of compensation, advantages, or benefits, for consideration of collaboration, help, influence, acting or failure to act, etc., constitutes a criminal offense subject to fines and/or imprisonment. This statutory offense involves both the giver and the taker, and certain jurisdictions do not set a minimum amount (e.g., "no cup of coffee rule.") Gifts shall not be provided by Maritime Support Services Limited employees to elected and appointed officials.
2. If a bona fide, long-term personal relationship has been maintained by a Maritime Support Services Limited employee and a government official, such relationship shall be documented and such documentation provided to Maritime Support Services Limited's MD / CEO. In cases such as this, any applicable federal, state, or provincial regulation shall be adhered to.
3. If Maritime Support Services Limited hosts an elected or appointed government officials for a facility visit, or otherwise as part of an education component, applicable laws and regulations must be followed with regard to meals provided and any samples, goods with Maritime Support Services Limited logo, etc. that might be provided. Advice in this regard should be sought in advance from MD / CEO.

Controlled by:	MSSL HSEQM	
Approved by:	Managing Director	




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4. Prudence and good judgment must be exercised and in case of doubt, MD / CEO should be consulted.

Political Contributions

1. Because Maritime Support Services Limited operates in multiple jurisdictions with varying and – at times – conflicting laws regarding political contributions, Maritime Support Services Limited does not make political contributions using corporate funds.
2. The use by employees of Maritime Support Services Limited's financial or material resources for political purposes is strictly prohibited.
3. Maritime Support Services Limited shall not pay its representatives' admission fees to partisan political activities. These activities are generally organized for the purpose of raising funds and may take the form of cocktails, meetings, banquets, meals, sporting events or other similar activities. Activities organized by, and with all proceeds going to, a recognized and registered charity, are not covered by this Policy.
4. Any exception to this Policy must have the prior approval of MD / CEO
5. An annual report on any political contributions must be submitted to the Board of Directors of Maritime Support Services Limited.
6. The MD / CEO is responsible for implementation of this Policy.
7. Nothing in this Policy shall restrict, in any way, personal political contributions made by employees to candidates for public office, political parties, Political Action Committees or any other political activity.
8. With the approval of MD / CEO, certain Maritime Support Services Limited employees may be solicited for participation in industry political activities. An example would be participation in an industry Political Action Committee.

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