



BAHARCORE MARINE SERVICES L.L.C.

INTEGRITY, ETHICS & COMPLIANCE MANUAL

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Approved by: Mr. Armino Gomes – Managing Director

Baharcore Marine Services L.L.C. | Khalifa Port, Abu Dhabi, UAE | www.baharcore.com



REVISION SHEET

Rev. No.	Date	Description / Text Affected	Remark
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DOCUMENT APPROVAL

Name	Position	Signature / Date
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Prepared by	Compliance Officer	
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Reviewed by	Quality & HSE Department	
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Approved by	Mr. Armino Gomes – Managing Director	
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Armino Gomes



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Foreword & Applicability

This manual defines Bahar core's integrity, ethics, and compliance framework.

It applies to all employees, contractors, agents, and suppliers engaged by Baharcore Marine Services L.L.C.

The Managing Director (MD), Mr. Armino Gomes, holds ultimate authority for approval, enforcement, investigation, and disciplinary actions.

This manual aligns with ISO 37001 (Anti-Bribery Management Systems) and ISO 37301 (Compliance Management Systems).



1. Anti-Bribery & Corruption Policy (ABC)

Baharcore operates a zero-tolerance approach toward bribery, facilitation payments, or kickbacks.

Employees and representatives must not offer, request, or accept any undue advantage—cash, gifts, favors, or hospitality—that could influence or appear to influence a business decision.



2. Code of Conduct

All employees and contractors must conduct themselves with honesty, fairness, and respect. Professional conduct, confidentiality, and proper data handling are mandatory.



3. Fraud Prevention & Whistleblowing

Fraud includes any intentional deception or misuse of company assets for personal or financial gain.

Employees may confidentially report suspected fraud, bribery, or unethical behavior directly to the Managing Director.



4. Conflict of Interest (COI) Policy

Employees must avoid situations where personal interests could influence professional judgment.

All potential conflicts must be declared and reviewed by the Managing Director.



5. Governance, Monitoring & Continuous Improvement

The Managing Director oversees policy implementation and compliance monitoring. Quarterly reviews and continuous improvement measures ensure integrity across operations.



6. Annexes (Templates & Registers)

Annex A – Gifts & Hospitality Register

Annex B – Conflict of Interest Declaration

Annex C – Third-Party Due Diligence Questionnaire

Annex D – Whistleblowing / Fraud Report Form

Annex E – Annual Compliance Review Checklist



7. Approval & Issue

Authorized and Approved by:

Mr. Armino Gomes

Managing Director – Baharcore Marine Services L.L.C.

Armino Gomes

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