



Stevens International Forwarders Anti-Bribery and Corruption Policy

Stevens International Forwarders is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Stevens International's behalf is responsible for maintaining Stevens International's reputation and for conducting business honestly and professionally.

Stevens International considers bribery and corruption to have a detrimental impact on business by undermining proper business practices and distorting free markets. Stevens International does not tolerate any form of bribery, whether direct or indirect, by its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. Senior management is committed to implementing and enforcing effective systems to prevent and eliminate bribery. Stevens International is issuing this anti-bribery and corruption policy outlining its position on preventing and prohibiting bribery and corruption. This policy applies to all employees; they are required to familiarize themselves and comply with it.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of Stevens International are strictly prohibited from making, soliciting or receiving any bribes or unauthorized payments. As a part of its anti-bribery measures, Stevens international accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received. A breach of this policy by an employee will be treated as grounds for disciplinary action. Employees and other individuals acting for Stevens International should note that bribery is a criminal offense that may result in imprisonment and/or fines for the individual and for Stevens International.

Stevens International will not conduct business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives. The success of Stevens International's anti-bribery and corruption measures depends on all employees, and those acting for Stevens International, playing their part in helping prevent bribery.

Therefore, all employees and others acting for, or on behalf of, Stevens International are encouraged to report any suspected bribery in accordance with the procedures set out in the policy or in the case of third parties to the Stevens International Secretary. Stevens International will support any individuals who make such a report in good faith.

To this end, we require our suppliers to support additional due diligence surrounding the requirements imposed by the Canadian Corruption of Foreign Public Official Act, the United States Foreign Corrupt Practices Act or "FCPA".