



COSCO in the UK ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Date: September 2011

UK Bribery Act

The UK Bribery Act 2010 came into force in the United Kingdom on 1 July and applies to all actions of COSCO in the UK, and those acting on our behalf, anywhere in the world.

The Act introduces the following offences:

- the general offences of offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery);
- the offence of bribing a foreign public official in order to obtain or retain business or an advantage in the conduct of business;
- an offence which can be committed by commercial organisations which fail to prevent bribery committed on their behalf;

Our Policy

COSCO in the UK are committed to conducting all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate.

COSCO in the UK and any person acting on its behalf shall not participate in any form of corrupt behaviour and shall comply with the Bribery Act 2010 and all other laws relevant to countering bribery and corruption.

Further, all employees and any agent, intermediary or third party acting on our behalf are required to avoid any activity that might lead to, or suggest, any breach of the UK Bribery Act or COSCO in the UK Anti-Corruption and Anti-Bribery Policy.

Who our policy applies to

Our policy applies to all employees, contractors, agents, intermediaries and any third parties who act on behalf of COSCO in the UK.

How to raise a concern

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for and on behalf of COSCO in the UK. Accordingly, all suppliers, service providers and other third party organisations are encouraged to raise a concern about COSCO in the UK relating to bribery and corruption.

Should you have any concerns or suspicions of actual or attempted bribery or corruption involving any employee, agent, intermediary or third party acting on behalf of COSCO in the UK, it must be reported as soon as possible to the Person in Charge on Tel +44 20 8594 8688; Email: ladask@cosco.co.uk.

All concerns raised will be treated confidentially without any risk of reprisal and all issues shall be thoroughly investigated by us.