



**中遠海運國際(香港)有限公司**

COSCO SHIPPING INTERNATIONAL (HONG KONG) CO., LTD.

## **Whistleblowing Policy**

**Revised version dated 18th August 2022**

## **Whistleblowing Policy**

### **1. INTRODUCTION**

COSCO SHIPPING International (Hong Kong) Co., Ltd. and its subsidiaries (collectively “COSCO SHIPPING International”) are committed to achieving and maintaining the highest standards of openness, probity and accountability. Employees at all levels are expected to conduct themselves with integrity, impartiality and honesty. It is every employee’s responsibility and in all interest of COSCO SHIPPING International to ensure that any inappropriate behaviour that compromise the interest of the shareholders, investors, customers and the wider public does not occur. It is also critical to maintain a good corporate image and raise the standard of corporate governance of COSCO SHIPPING International. To this end, COSCO SHIPPING International has devised a whistleblowing policy (the “Policy”).

### **2. PURPOSE AND APPLICABLE AREA**

The purpose of formulating the Policy is to increase the awareness of maintaining internal corporate justice of COSCO SHIPPING International and regard this as a kind of internal control mechanism that promote and support anti-corruption laws and regulations. It provides the employees and those who deal with COSCO SHIPPING International (e.g. customers and suppliers) with reporting channels and guidance to raise concerns about possible improprieties in any matter related to COSCO SHIPPING International and its employees. The term ‘whistleblowing’ refers to a situation where employees or those who deal with COSCO SHIPPING International decide to report serious concerns about any malpractice which they have become aware or genuinely suspect that COSCO SHIPPPING International and its employees has been or may become involved in. This Policy is designed to encourage employees and those who deal with COSCO SHIPPING International to raise serious concerns, in a responsible and effective manner rather than overlooking a problem. The content of this Policy is applicable to all employees of COSCO SHIPPING International and its subsidiaries in Hong Kong or outside Hong Kong, as well as those who deal with COSCO SHIPPING International.

### 3. POLICY

This Policy is intended to assist individual employees (permanent or temporary employees) and those who deal with COSCO SHIPPING International to disclose to COSCO SHIPPING International internally and at a high level, information which the individual believes shows malpractice or impropriety. It is not designed to further any personal disputes, question financial or business decisions taken by COSCO SHIPPING International nor should it be used to reconsider any staff matters which have been addressed under the grievances procedure already in place. Whistleblowing matters may include but are not confined to:

- Breach of legal or regulatory requirements
- Criminal offences, breach of civil law and miscarriage of justice
- Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters
- Endangerment of the health and safety of an individual
- Damage caused to the environment
- Violation of the rules and regulations of COSCO SHIPPING International or the rules of conducts of COSCO SHIPPING International (including but are not confined to “Staff Code of Conduct”)
- Improper conduct or unethical behaviour likely to prejudice the standing of COSCO SHIPPING International
- Deliberate concealment of any of the above

#### 3.1 Protection and Confidentiality

It is COSCO SHIPPING International’s policy to make every effort treating all disclosures in a confidential and sensitive manner after a whistleblower reports concern about any of the above matters. The identity of the whistleblower (person or entity) making the allegation will not be divulged without his/her/its consent. However, there may be circumstances in which COSCO SHIPPING International may be required or legally obliged to reveal the whistleblower’s identity, for example, where an investigation leads to legal proceedings being initiated. If this is the case, COSCO SHIPPING International will take all reasonable steps to ensure that the whistleblower suffers no detriment. Harassment or victimization of a genuine whistleblower will be treated as gross misconduct, which if proven, may result in legal action.

### 3.2 Untrue Allegations

In making a disclosure, the whistleblower should exercise due care to ensure the accuracy of the information. No matter the allegations are being proven, the whistleblower will not be at risk of suffering any form of retribution as a result provided that he/she is acting in good faith and reasonable manner. On the other hand, disciplinary/legal action may be taken against the whistleblower (employee of COSCO SHIPPING International) who is proven to raise false and malicious allegations deliberately while legal action may be taken against the whistleblower who is proven to raise baseless or frivolous allegations deliberately.

### 3.3 Acknowledgement and Recognition

COSCO SHIPPING International places great value upon creating an environment where employees would maintain the highest standard of ethics, honesty, openness and accountability. COSCO SHIPPING International recognizes that it requires courage and personal quality such as righteousness, loyalty and impeccable integrity the whistleblower to step out and blow the whistle. These personal qualities and positive behaviours demonstrated by the whistleblowers are well acknowledged by COSCO SHIPPING International, career opportunities and advancement will be taken into consideration among others for the employee whistleblower.

## 4. PROCEDURE

### 4.1 Reporting Channel

The whistleblower may report the matter directly to the Audit Committee or the Audit & Supervision Division of COSCO SHIPPING International at appropriate time. Upon receipt of the report, the Audit Committee or the Audit & Supervision Division of COSCO SHIPPING International will review the complaint and decide the action taken and whether or not the matter will be investigated.

### 4.2 Reporting Format

Disclosures can be made in person or in writing. If the disclosure is made in writing, it should be sent by post to the **Chairman of the Audit Committee** or **the Audit & Supervision Division** of COSCO SHIPPING International at

the principal place of business of COSCO SHIPPING International, **47th Floor, COSCO Tower, 183 Queen’s Road Central, Hong Kong**, in a sealed envelope clearly marked “Strictly Private and Confidential – To be Opened by Addressee” to ensure the confidentiality, or sent by email to [whistleblowing@coscointl.com](mailto:whistleblowing@coscointl.com) (accessed by the Chairman of Audit Committee) or [internalaudit@coscointl.com](mailto:internalaudit@coscointl.com) (accessed by the Audit & Supervision Division). If the Audit & Supervision Division is being complained against, the report should be made in person or by post addressed to the “Chairman of the Audit Committee” at the same address or by email to [whistleblowing@coscointl.com](mailto:whistleblowing@coscointl.com). All the attachments of the email shall have password in order to ensure the confidentiality.

#### **4.3 Anonymous disclosure**

COSCO SHIPPING International encourages the whistleblower to disclose their identity and contact information so that we can contact for further information and respond to reports when necessary.

However, anonymous complaints are also accepted provided that these disclosures contain sufficient information to allow the investigating party to conduct an effective investigation. Disclosures without sufficient information and/or a method of contact may delay or prevent further investigation into the matter.

COSCO SHIPPING International will hold it a serious disciplinary offence for any employee to seek to prevent a communication of malpractice concern reaching to the Audit Committee or the Audit & Supervision Division of COSCO SHIPPING International, or to impede any investigation which he/she or anyone on his/her behalf may make.

If there is evidence of criminal activity, activity on solicitation and acceptance of advantages or breach of legal and regulatory requirements of COSCO SHIPPING International, the party responsible for the internal investigation may legally be obliged to inform the relevant public or regulatory bodies such as the Hong Kong Police Force, the Independent Commission Against Corruption or the Security and Futures Commission or relevant regulatory body in China Mainland as appropriate.

#### 4.4 Investigation Procedure

The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may

- be investigated internally;
- be referred to the Hong Kong Police Force or regulatory body in China Mainland;
- be referred to the External Auditor; and/or
- form a task force of an independent investigation.

The Chairman of the Audit Committee or the person delegated by Chairman of the Audit Committee or Audit & Supervision Division of COSCO SHIPPING International will write to the complainant wherever reasonably practicable of the concern being received:

- acknowledging that the concern has been received;
- advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
- giving an estimate time length the investigation will take to provide a final response; notifying the complainant whether any initial enquiries have been made, and whether further investigations will take place, and if not, state the reason(s).



## **5. INTERPRETATION, ENFORCEMENT AMENDMENT AND EFFECTIVENESS OF THE POLICY**

- 5.1 The board of directors of COSCO SHIPPING International is responsible for the interpretation and supervision of enforcement of this Policy.
- 5.2 Any amendment to this Policy must be approved by the board resolutions of COSCO SHIPPING International.
- 5.3 The Policy is implemented on the date of approval of the board of directors of COSCO SHIPPING International.

Adopted on 12th September 2008

Revised on 28th August 2017

Revised on 26th April 2018

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