



BEN LINE AGENCIES

Your Partner in Asia

CODE OF CONDUCT

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Introduction

With a track record of nearly 200 hundred years in numerous sectors of the maritime industry, Ben Line Agencies (hereafter referred to as 'BLA') prides itself on being your maritime services partner of choice in Asia. Working with many of the best-known names in the maritime sector, BLA has established a solid reputation based on integrity, consistency and competency, providing high quality services in compliance with all relevant laws. This Code of Conduct establishes some key principals that apply throughout BLA's business activities as well as to its Directors and Employees. These principles relate to:

- Corporate Social Responsibility
- Business Ethics
- Anti-Corruption and Bribery
- Trade Compliance
- Employees' Conduct and Workplace Environment
- Health, Safety, Environment and Quality

Corporate Social Responsibility

- BLA strives to be a successful, growing, profitable business whilst at the same time, seeking to do right by those who work for and with the company.
- We respect the Universal Declaration of Human Rights and seek to be guided by its provisions in the conduct of our business.
- We have implemented and apply numerous stringent controls on matters of Corporate Governance such as Anti-Corruption and Bribery, Trade Compliance and Health, Safety, Environment and Quality.
- In delivering high quality ethical services, we strive for integrity, competence, trust, performance and accountability.
- We look to contribute positively in all the communities where we operate.

<http://www.un.org/en/universal-declaration-human-rights/index.html>

Business Ethics

- Conduct our business with integrity, competence and consistency.
- Maintaining the highest standards of professionalism in all dealings with others.
- Seek to achieve mutually beneficial business relationships with customers, suppliers and all other business partners.
- Customer, supplier and all other business partners' privacy is to be respected and their data protected.
- Ensure that customers, suppliers and all other business partners are familiar with the Code and its key Principles.
- Free and open competition.
- We retain the moral rights in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the moral and intellectual copyright vested in our clients' intellectual property.

Anti-Corruption & Bribery

- BLA, its subsidiaries and affiliates is committed to acting ethically and in full compliance with applicable anti-bribery laws and regulations always.
- As part of this commitment, it is the fundamental policy of Ben Line Agencies to prohibit the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining or retaining any business advantage.
- This policy applies to all Employees of BLA plus all business partners.
- New employees will receive training on this policy as part of the induction process. All existing employees will receive regular and appropriate training on how to implement and adhere to this policy.
- Training will also be extended to business partners.
- BLA is an associate member of the Maritime Anti-Corruption Network (MACN), a global business network comprised of like-minded companies committed to promoting compliance with anti-corruption law. MACN's vision is to work towards a maritime industry free of corruption that enables fair trade to the benefit of society at large.
- BLA is also a member of TRACE International, a non-profit business association, founded by anti-bribery compliance experts with an objective to set a common standard for due diligence reviews of commercial intermediaries and anti-bribery training for the global supply chain.

<http://www.benlineagencies.com/corporate.php>

<http://www.maritime-acn.org/>

<https://www.traceinternational.org/>

Trade Compliance

- BLA, its subsidiaries and affiliates, is committed to full compliance with all applicable laws governing international trade transactions and activities.
- This policy applies to all Employees of BLA plus all business partners.
- New employees will receive training on this policy as part of the induction process. All existing employees will receive regular and appropriate training on how to implement and adhere to this policy.

<http://www.benlineagencies.com/corporate.php>

Employees' Conduct and Workplace Environment

- Employees must comply with all legal requirements and understand the major laws and regulations that apply to their work.
- Where no legislation or rules govern personal conduct, employees must consult with their Management for guidance.
- Employees must avoid activities that conflict with BLA's interests. They are obliged to report any actual or possible conflict of interest to their Management for further review.
- BLA employees shall perform their work without the influence of alcohol or drugs.
- BLA promotes equal opportunity in its hiring practices, making recruitment decisions based solely on job-related criteria and does not use forced or under-age labour.
- Employees must treat each other, customers and all business partners with respect and dignity, ensuring that the working environment is free of harassment, bullying and discrimination.
- Employees are offered training opportunities relevant to the functions they perform.
- BLA respects employee privacy and protects applicable data accordingly.

Health, Safety, Quality and Environment (HSEQ)

- BLA is committed to operating in a manner that protects our employees and the environment; adheres, at the very minimum, to relevant government safety, environmental and health regulations; provides our customers with "value added" services so that they can further protect their employees, property and the environment.
- New employees will receive HSEQ training as part of their induction whilst existing employees will be provided with the appropriate resources and training, to ensure that they can undertake our operations to the required HSEQ standards.
- BLA is accredited by Lloyds Register LRQA. The assessment standards currently are ISO 9001: 2008 (Quality Management System), ISO 14001: 2004 (Environmental Risk) and OHSAS 18001: 2007 (Occupational Health and Safety Management System)

<http://www.benlineagencies.com/qhse.php>