



# Code of Conduct

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## 1 Introduction

With a track record of nearly 200 hundred years in numerous sectors of the maritime and logistics industries, Ben Line Agencies (hereafter referred to as 'BLA') prides itself on being your maritime and logistics services partner of choice in Asia. BLA has established a solid reputation based on integrity, consistency, and competency, providing high quality services in compliance with all relevant laws. In line with our Company Mission and Values, 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
- Social Media

## 2 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 take very seriously our obligations under the United Kingdom Modern Slavery Act (2015) ("MSA"), the Australian Modern Slavery Act (2018) ("Aus MSA"), and in all other jurisdictions in which we operate.
- We are committed to ensure that human trafficking, forced, debt-bonded or slave labour is not taking place within our business activities or elsewhere in our organisation.
- We are committed to an inclusive work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices. We expect that all relationships among persons in the workplace are business-like and free of bias, prejudice and harassment.
- 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.

[Modern Slavery Act Statement](#)  
[UN Universal Declaration Human Rights](#)



### 3 Business Ethics & Integrity

- 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.
- Employees are expected to avoid all situations in which their personal or financial interests may conflict with the company's interest or may interfere with objective job performance.
- We foster free, open, and fair competition.
- We are committed to competing fairly across our operations and do not engage in practices that restrict fair market competition.
- We are committed to have no involvement, be it directly or indirectly, with money laundering. In case an employee finds a certain financial transaction suspicious, the employee should seek immediate guidance from his/her direct manager and/or the Compliance Department.
- We respect all individuals' general right to privacy in relation to their personal data, and we adhere to all applicable local laws on the use of personal data. We are committed to securing customer, supplier and employee data against (personal) data breaches. We adhere to the highest possible standards of Cybersecurity and conduct regular Cybersecurity training.
- Ensure that customers, suppliers, and all other business partners are familiar with the Code and its key Principles.
- 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.

### 4 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 a 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.

[Anti-Bribery Policy](#)

[Maritime Anti-Corruption Network](#)

[TRACE International](#)



## 5 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.

[Trade Sanctions Policy](#)

## 6 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.
- All personal information collected and recorded, on paper or electronically, has appropriate safeguards in place as required by statutory, regulatory, contractual or quality management obligations. Ben Line Agencies' policies and procedures are intended to minimize the risk of loss or damage.
- Employees have legal rights in relation to how Ben Line Agencies processes personal information, including but not limited to: Right to be informed / Right of access / Right to request rectification / Right to request erasure / Right to restrict processing / Right to data portability / Right to object or withdraw consent.

[Privacy Policy](#)



## 7 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: 2015 (Quality Management System), ISO 14001: 2015 (Environmental Risk) and ISO 45001: 2018 (Occupational Health and Safety Management System)
- BLA is committed to promoting and actively ensuring sustainable practices at all levels of the company. We want to ensure continuous improvements in reducing our environmental footprint of our own operations and that of our customers and partners. We accept this responsibility to our environment and communities, by managing the impacts of our operations.

[Health, Safety, Environment & Quality Sustainability](#)

## 8 Social Media

Employee use of social networking reflects on both the employee and the Company. The Company does not intend to restrict the employee’s ability to have an online presence, nor does it mandate what the employee can and cannot say online. It does however expect the employee to be responsible and accountable for what they post, just as if you said your posts out loud in public or published them in a newspaper. We provide these guidelines for appropriate online conduct.

Guidelines for Employees:

- Never post any confidential, sensitive, personal, or proprietary information about the company, its employees, or any of the Company’s customers or potential customers.

In practice this can mean a number of things. Obviously, we should never post our own or other peoples’ sensitive personal, contractual, or financial information online. From time to time we as a Company might post interesting pictures or videos of site, ship or port operations, but this also needs to be considered carefully. Although this sort of post can be great in terms of marketing impact, it can also contain client information of a personal or commercial sensitivity that we are not aware of. For that reason, we would ask all employees to refrain from posting content relating to operations unless senior management have cleared the material, and the client’s authorisation is secured. This kind of material would normally be released via official Ben Line Agencies social media channels, after the required checks.



- Keep personal and professional profiles separate.

Comments made in a private group, visible to friends and family, may not always be appropriate to professional life. It's good sense to ensure that your privacy settings are configured properly, but it's also important to appreciate that even private posts can be forwarded, and nothing is truly secure. Whatever goes online is often there permanently. It's also very important to ensure your passwords remain secure, as readers of posts will hold you directly accountable for anything that appears via your profile.

If you set up a social media profile for personal reasons, you should avoid linking it to your office email and making references to the Company (for instance including a link to our web site). It's good to see Ben Line enjoying positive exposure online, but bear in mind that like every Company, we have a 'brand', and the way we present ourselves needs to be managed and consistent. If you have content you'd like to post using a 'professional' platform (i.e. LinkedIn), run this past your senior management first. No employees may create an "official" Company blog, social media page, website, or any other social or online media presence without prior written authorisation from an Executive Director.

- Always bear in mind the Ben Line Agencies Code of Conduct.

Always remember that when you post anything on line, particularly anything that can be associated with the Company, you must ensure comments abide by and are in the spirit of the Ben Line Agencies Code of Conduct. There is also an absolute requirement to obey local laws, including those laws governing defamation, discrimination, harassment, and copyright.

The reality is that even if your comments or profile don't explicitly reference the Company, you are still associated with Ben Line through your employment, and just as in 'offline' life, its best to treat people with respect.

- Look out for online commentary that concerns the Company.

Hopefully when we see items posted by third parties concerning Ben Line, the views expressed are complimentary and positive. If however you see comments online that are of a derogatory nature, and are aimed at the Company or employees of the Company, do not respond. Please immediately escalate anything like this to your management. Whether the comments are fair or not, complaints or other negative comments need to be dealt with in a considered manner.

- Make sure that readers know when the views expressed are your own.

If you are publishing personal blogs, employees should make clear to readers that the views expressed in those blogs are personal and are in no way the view of the Company.

No employees may create an "official" Company blog, social media page, website, or any other social or online media presence without prior written authorisation from an Executive Director.



- Respect confidentiality.

Always work on the assumption that information shared internally is for internal communication only. Just because most correspondence is not marked as confidential; this does not mean it's for external distribution. The fact is that we all send information to colleagues, clients, and vendors, based on the assumption that it will only be shared with other colleagues that need the information to do their jobs.

- Take responsibility.

Ultimately, we are as individuals responsible for our own actions. The Company has no desire to take punitive measures, but in serious cases, violation of these policy guidelines may be grounds for termination. Employees are encouraged to address any concerns or questions concerning these guidelines, or any violation of them, to your Country Management.

## 9 Whom to contact

If you have a concern about what is proper conduct for yourself or anyone else in a specific situation, or if you want to report irregularities, you should contact your direct manager or Group Compliance at [compliance@benlineagencies.com](mailto:compliance@benlineagencies.com).

Approved:

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**Kristian Vandermeer**  
Group Managing Director

24th March 2022  
Date



<b>DATE:</b>	<b>REASON FOR UPDATE:</b>	<b>REVIEWED BY:</b>
01/02/2019	V 001 Created	
03/08/2021	V 002 Updated policies, Updated formatting	Kristian Vandermeer / Matthew Soloman
08/12/2021	V 003 Updated UN Declaration of Human Rights hyperlink	Kristian Vandermeer
24/03/2022	V 004 UPDATED; Competition Law, Conflict of interest, money laundering, data privacy elements, Contact element	Kristian Vandermeer