



Supplier General Business Principles and Code of Conduct

Table of Content

1	Introduction	2
2	Corporate Social Responsibility	2
3	Business Ethics & Integrity	3
4	Anti-Corruption & Bribery and Trade Compliance	3
5	Health, Safety, Quality and Environment (HSEQ).....	4
6	Whom to contact.....	4



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. We will develop and strengthen relationships with contractors and suppliers who are committed to the principles set out below or to similar standards through their own activities and the management of their own suppliers and sub-contractors.

Contractors and suppliers should provide workers with a dedicated whistle-blowing mechanism where grievances related to below topics can be logged confidentially. These principles relate to:

- Corporate Social Responsibility
- Business Ethics
- Anti-Corruption & Bribery and Trade Compliance
- Health, Safety, Environment and Quality

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.
- Contractors and suppliers should respect the Universal Declaration of Human Rights and seek to be guided by its provisions in the conduct of our business.
- Contractors and suppliers must take very seriously our obligations under the United Kingdom Modern Slavery Act (2015) ("MSA"), the Australian Modern Slavery Act (2018) ("Aus MSA"), in all jurisdictions in which we operate.
- Contractors and suppliers must commit to ensure that human trafficking, forced, debt-bonded or slave labour is not taking place within their business activities or elsewhere in their organization or supply chain.
- Contractors and suppliers must be 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. BLA expects that all relationships among persons in the workplace are business-like and free of bias, prejudice and harassment.

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



3 Business Ethics & Integrity

- Contractors and suppliers must comply with all applicable laws and regulations.
- Contractors and suppliers should not tolerate, permit, or engage in bribery, corruption or unethical practices.
- Contractors and suppliers should maintain the highest standards of professionalism in all dealings with others.
- Contractors and suppliers are expected to avoid all situations in which their personal or financial interests may conflict with BLA's interest.
- Contractors and suppliers foster free, open, and fair competition.
- Contractors and suppliers must be committed to have no involvement, be it directly or indirectly, with money laundering.
- BLA respects all individuals' general right to privacy in relation to their personal data. We expect all contractors and suppliers to adhere to all applicable local laws on the use of personal data.
- Contractors and suppliers must ensure that their customers, suppliers, and all other business partners are familiar with the BLA Supplier General Business Principles and Code of Conduct and its key Principles.
- BLA retains 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.
- Contractors and suppliers must provide a safe, secure, and healthy workplace and not tolerating discrimination, harassment or retaliation.

4 Anti-Corruption & Bribery and Trade Compliance

BLA maintains a policy of zero tolerance and are committed to acting ethically and in full compliance with applicable anti-bribery laws and regulations.

Contractors and suppliers must commit to:

- being in full compliance with all applicable laws governing international trade transactions and activities.
- never offer, pay, solicit or accept any bribes, facilitation payments, Gifts or other incentives either directly or through intermediaries in order to obtain an unfair or improper advantage or to obtain or retain a business for any business transaction.
- avoid conflict of interest and are expected to promptly report to BLA any actual, potential, or apparent conflict of interest situation.
- provide an honest disclosure of their organization, its experiences, qualifications, capabilities, and financial status.
- request its sub-contractors, sub-vendors, and agents to comply with BLA's Supplier General Business Principles and Code of Conduct to prevent corrupt practices in the supply chain.
- comply fully with all applicable laws, including laws of the United Nations, United States, the Member States of the European Union, and other countries governing international trade transactions and activities.
- respect employee privacy and to protect applicable data accordingly.



5 Health, Safety, Quality and Environment (HSEQ)

Contractors and suppliers have a systematic approach to HSEQ management designed to ensure compliance with all applicable laws and regulations and to achieve continuous performance improvement.

Contractors and suppliers:

- are committed to operating in a manner that protects their employees and the environment; adheres, at the very minimum, to relevant government safety, environmental and health regulations; provides BLA's customers with "value added" services so that they can further protect their employees, property, and the environment.
- will ensure HSEQ training is provided to all their employees to ensure that they can undertake BLA's operations to the required HSEQ standards.
- use energy and natural resources efficiently.
- continually look for ways to minimise waste, emissions and discharge of their operations, products and services.
- respect their neighbours and contribute to the societies in which they operate.
- manage the social impacts of their activities carefully and enhance the benefits to local communities.
- recognize that regular dialogue and engagement with stakeholders is essential. In interactions with employees, business partners and local communities, seek to listen and respond to them honestly and responsibly.

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

6 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 can contact us at compliance@benline.com.



Approved:

Kristian Vandermeer
Group Managing Director

31 May 2024

Date

DATE:	REASON FOR UPDATE:	REVIEWED BY:
31/05/2024	V 001 Created	