

Wan Hai Lines Anti-Corruption and Anti-Bribery Policy

As a global shipping company, Wan Hai Lines (hereinafter referred to as the "Company") is committed to fully implement the integrity management; the Company's personnel (including any director, supervisor, managerial officer, mandatary, employee or person having substantial control of the Company or its group enterprises and organizations) and the Company's business partners will abide by Ethical Corporate Management Best Practice Principles and Ethical Corporate Management Procedures and Conduct Guidelines; the Company takes a zero-tolerance policy against corruption and bribery; the Company complies with all applicable anti-corruption and anti-bribery laws and relevant local and/or international regulations of the places where the Company operates, with a view to provide all personnel of the Company with clear directions for the performance of their duties.

Corruption and bribery in any form are all strictly prohibited, whether in public or private, or through active or passive means. The Company and the Company's personnel shall not offer, solicit, or accept bribes; shall not accept kickbacks, or any gifts for the purpose of obtaining or retaining business or any other improper advantage. Any of the Company's personnel who engages in aforementioned conduct is punishable in accordance with internal procedures and shall be reported to the relevant judicial authorities.

【 Prohibition against Corruption 】

Corrupt practices include collusion, fraud, embezzlement, theft, insider trading, money laundering and any misconduct for any other improper benefit, with intent to influence a third party or benefit oneself or others, as a result of which the Company suffers damages and losses.

【 Prohibition against Bribery 】

The bribery refers to the following behaviors by offering any valuable and improper benefit:

- (1) Any other intends to influence the Company's actions or decisions, to gain or retain the commercial, regulatory or private advantages.
- (2) The Company intends to influence any other's actions or decisions, to gain or retain the commercial, regulatory or private advantages.

【 Definition of Benefits 】

"Benefits" means any valuable things, including money, donations and gifts, commissions, positions, services, preferential treatment, or kickbacks, etc. in any tangible or intangible form or in any name. However, benefits received or given occasionally in accordance with normal social etiquette and customs and that do not adversely affect specific rights and obligations shall be excluded.

【 Training and Communication 】

To strengthen the importance of complying with Anti-Corruption and Anti-Bribery policy, the Company should annually conduct training and communication and propaganda for the Company's personnel which aims to ensure that the Company's personnel comprehensively understand the Anti-Corruption and Anti-Bribery policy, the elements of corruption and bribery, whistleblower channels and protection, and the consequences and risks of violating the policy.

【 Maintenance and Integrity of Records 】

The Company will record all financial transactions-completely and accurately, including donations and gifts, and ensure that all records are free from tamping, misleading or any omission.

【 Whistleblower channels and protection 】

The Company encourages internal and external personnel to report corruption, bribery, dishonesty or misconduct, and undertakes to protect anyone who has, in good faith, reported a possible violation of law or of internal procedures, from any form of improper treatment or unfair treatment, and keeps the identity of such personnel and the relevant content of the complaint or report confidential, and allows anonymous reporting.

The Company provides the following independent whistleblower mailbox, which is available on the Company's website, for the use of internal and external personnel.

The independent whistleblower mailbox on the Company's website:

comment@wanhai.com

The policy was enacted on December 6, 2022.

The 1st amendment was made on December 16, 2023.