



# COSCO SHIPPING Ports Limited

## 中遠海運港口有限公司

*(Incorporated in Bermuda with limited liability)*

(Stock Code: 1199)

## Whistleblowing Policy

### General Provisions

1. This policy is formulated in accordance with applicable laws and regulations and in consideration of the practical situations of COSCO SHIPPING Ports Limited (hereinafter referred to as the “Company”), with a view to improving the governance of the Company, fostering the honest conduct of all members (including directors, senior management and employees at all levels), establishing a smooth whistleblowing channel, standardising the acceptance and investigation of reports of whistleblowing, and detecting and disciplining illegal, unethical practices or irregularities in a timely manner.
2. This policy shall apply to the Company and its subsidiary companies (hereinafter referred to as “All Units”). Subsidiary companies include wholly-owned and controlled subsidiaries at all levels of the Company.

### Reporting

3. Any member of the Company or other persons having any dealings with the Company (such as customers and suppliers) may report any illegal, unethical practices or irregularities in the operation and management of the Company. Reportable matters include:
  - (1) Violation of laws or regulatory provisions;
  - (2) Illegal acts, misconduct or fraud involving accounting, auditing, finance and other matters in relation to internal control;
  - (3) Jeopardizing the health and safety of any individual;
  - (4) Damaging the environment;
  - (5) Violation of any Company rules, regulations or codes of conduct;
  - (6) Improper conduct or unethical behaviour that may damage the reputation of the Company; or
  - (7) Deliberate concealment of any of the above.

### Channels for Reporting

4. Any person who discovers any illegal, unethical practices or irregularities during the course of operation and management may report through the following reporting channels:

**Channel 1:** Report to the Audit & Supervision Department of the Company. The mailing address and email are as follows:

Mailing address:	Audit & Supervision Department COSCO SHIPPING Ports Limited 49th Floor, COSCO Tower, 183 Queen’s Road Central, Hong Kong	Audit & Supervision Department COSCO SHIPPING Ports Limited 5th Floor, No.658 Dongdaming Road, Shanghai
Email:	<a href="mailto:whistleblowing@cspterminals.com">whistleblowing@cspterminals.com</a>	

**Channel 2:** Report to the Chairman of the Audit Committee of the Company. The mailing address and email are as follows:

Mailing address:	Chairman of the Audit Committee of COSCO SHIPPING Ports Limited 49th Floor, COSCO Tower, 183 Queen's Road Central, Hong Kong
Email:	<a href="mailto:whistleblowing-ac@cspterminals.com">whistleblowing-ac@cspterminals.com</a>

Emails or written letters shall be received in care of the Audit & Supervision Department and reported to Chairman of the Audit Committee.

Where the report is made in the form of a letter, to ensure confidentiality, the letter shall be sealed in an envelope clearly marked with “Whistleblowing report – Do not open without authorisation”.

### **Named/Anonymous Report**

5. The Company encourages whistleblowers to use their real names in order to facilitate follow-up work and discourage malicious whistleblowing. If a whistleblower reports anonymously, the Company may not be able to obtain additional information necessary for following up or investigation.
6. The Company undertakes to keep the personal information of the whistleblower confidential subject to a knowledge range to the extent necessary, and shall not dismiss, demote, suspend, threaten, harass the whistleblower or prejudice him/her in any other form, except in the case of malicious whistleblowing.

### **Fraudulent or Malicious Accusation**

7. The Company is strongly against malicious whistleblowing. Where a whistleblower makes a fraudulent or misleading report to the investigators while being knowledgeable of the actual situation, the Company shall hold such person accountable. Where matters have been

referred to the judicial authorities, disciplinary measures will be imposed in accordance with the applicable laws and regulations.

### **Investigation**

8. The Company or the Chairman of the Audit Committee shall provide reply to a reasonable report made by a whistleblower with real name provided. The reply shall generally include:
  - (1) Confirmation of the receipt within 15 working days upon receipt or wherever reasonably practicable of the whistleblowing report;
  - (2) Whether further investigation will be made to the reported matter; if necessary, suggestions in relation to the provision of further information and evidence; and
  - (3) Where appropriate, completion status of the investigation.
9. Based on the results of the investigation and the seriousness of the violation, member(s) who are found in violation of the rules and regulations shall be subject to strict disciplinary actions in accordance with the applicable rules. Where the responsible person is in violation of local laws or regulations, the Company shall refer the case to the judicial authority and pursue legal responsibilities.

### **Confidentiality**

10. The Company shall handle all disclosed information confidentially and prudently. The Company shall not disclose the identity of the whistleblower without his/her consent. However, in certain cases, such as where an investigation requires the commencement of legal proceedings, the Company may be requested or becomes legally obliged to disclose the identity of a whistleblower. In such cases, the Company shall take all reasonable steps to protect the rights and interests of the whistleblower.

December 2022