



Evergreen Marine (UK) Ltd

Anti-Bribery & Corruption Statement

Introduction from the board

In 2022 we implemented the Evergreen Marine Anti-Bribery & Corruption Policy (the “Policy”) which is designed to ensure that we conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery and corruption.

It is our intention to continue to build on the systems and controls we have already put in place and to improve the effectiveness of our measures over time. This statement sets out both the steps we have put in place and also the steps we intend to implement.

Organisation's structure

We are a UK-based limited company, with headquarters in London. Evergreen Marine has around 194 employees, and is a leading global container carrier, providing liner shipping services worldwide.

Our supply chains

Our main suppliers are companies involved in the handling, storage and transportation of imported and exported goods. These would be UK container ports, container depots used for the storage and preparation of Evergreen containers, and intermodal companies whom we contract to move our containers by road, rail and sea

Our policies on anti-bribery and corruption

We are committed to ensuring that there is no bribery or corruption in our business dealings and relationships and our Policy reflects our commitment to acting honestly and ethically in all our business relationships and to implementing and enforcing effective systems and controls to ensure corruption and bribery are not taking place anywhere in our organisation or our supply chains. As part of this commitment, we have in place procedures to:

- Ensure our employees and suppliers are aware of this Policy and the consequences of breaching any of its terms; and
- Manage the giving and receiving of hospitality and gifts, and the making of donations, in a manner that does not breach the terms or spirit of our Policy.



Due diligence processes for anti-bribery and corruption

As part of our initiative to identify and mitigate risk, we are implementing systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of corruption and bribery occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.
- Manage the giving and receiving of hospitality and gifts and the making of donations.

We have allocated responsibility internally to one of our departments to ensure that our anti-bribery and corruption processes are as robust as they can be and to identify any changes that could be made to improve our processes over time.

Supplier adherence to our values and ethics

We consider that the greatest risk of corruption and bribery in our supply chains is when we deal with companies based in jurisdictions which do not have equivalent standards and legislation to the UK.

As part of our ongoing risk assessment and due diligence processes, we assess whether the circumstances warrant the inclusion of specific prohibitions against, or obligations to avoid, corruption and bribery in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Policy, which sets out our zero tolerance of corruption and bribery.

If we find that other individuals or organisations working on our behalf have breached our Policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remedied and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

Training

To ensure a high level of understanding of the risks of corruption and bribery in our supply chains and our business, we will be providing ongoing training to our staff.

Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-bribery and corruption policy. Employees are taught the benefits of stringent measures to tackle corruption and bribery, as well as the consequences of failing to eradicate corruption and bribery from our business and supply chains.



EVERGREEN MARINE (UK) LTD.

We have allocated responsibility internally to one of our departments to ensure that appropriate training of staff occurs where necessary.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no corruption or bribery in our business or supply chains we intend to take the following further steps to combat corruption and bribery:

- Carrying out a review of our anti-bribery and corruption compliance.
- Reviewing our Policy.
- Provide training to new employees where necessary.

This statement constitutes our anti-bribery and corruption statement for the financial year ending 31 December 2022. It was approved by the board of directors on 17th November 2022.

Vincent Huang, Chairman
Evergreen Marine (UK) Ltd
17th November 2022