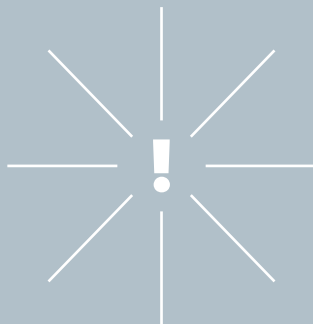




HMM HOW TO ACT!

— Anti-Bribery & Anti-Corruption Handbook —

HMM HOW TO ACT!



Anti-Bribery &
Anti-Corruption Handbook

Contents

INTRODUCTION OF HMM HOW TO ACT!	05
------------------------------------	----

HMM'S ANTI-BRIBERY & ANTI-CORRUPTION POLICY	08
--	----

① GET PREPARED	09
----------------	----

② RECOGNIZING A BRIBE	10
-----------------------	----

③ HOW TO ACT	11
--------------	----



HMM HOW TO ACT!

Introduction of HMM How to Act!



HMM Anti-Bribery & Anti-Corruption Handbook

HMM is committed to building an ethical business environment as a trustworthy and transparent global leader in ocean shipping.

Since establishing our Anti-Bribery & Corruption Policy on January 1, 2013, HMM has continuously enforced the policy and provided Ethics & Compliance training to our employees.

This handbook offers guidance on how to appropriately handle and report instances of bribery or corruption in accordance with HMM's policy.

For any inquiries regarding this handbook or related policies, please contact the Legal & Compliance Team at HQ.

Plus, to report any concerns or potential violations, please use the Ethics Hotline available on our Ethics Management website.



The Consequences of Bribery & Corruption

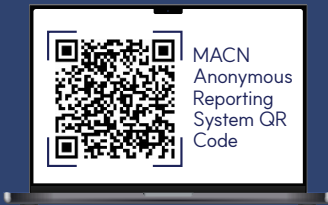
Bribery and corruption increase business costs and harm companies, customers, suppliers, and society. They create uncertainty and disrupt fair competition.

Violating anti-bribery and anti-corruption laws can lead to fines, criminal penalties, and significant reputational damage for companies and individuals.

MACN Maritime Anti-Corruption Network

The MACN is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

Established in 2011 by a small group of committed maritime companies, MACN has grown to include over 220 companies globally and has become one of the pre-eminent examples of collective action to tackle corruption.



We, HMM joined the MACN as a full member in September 2019, actively participating in the global movement towards anti-corruption in the shipping industry along with other member companies.



HMM's Anti-Bribery & Corruption Policy

HMM is dedicated to ensuring that all activities under its control are free from bribery.

1

No bribery

– direct, indirect, or through third parties.

2

Do not ask for, arrange, or accept bribes for yourself or others(family, friends, etc.)

3

HMM recognizes that facilitation payments are bribes

– we works to eliminate them.

4

Gifts, hospitality, or expenses that may influence our business decisions are NOT allowed.

– If you receive any gifts or benefits, please complete the Gift and Monetary Item Receipt Report Form and upload it to the HMM ECMS(Enterprise Compliance Management System) for review by the HQ Legal & Compliance Team.

5

No political donations

– HMM, employees, or agents must NOT give money or support to political parties or individuals to gain business advantage.

6

All employees in HMM are familiar with Anti-Bribery & Corruption Policy. The policy will be communicated with anyone working for or on behalf of HMM.

1

Get Prepared

Know what counts as a bribe – including facilitation payments, duress, and extortion.

HMM has clear rules that all employees must follow.

Please make sure you understand the key points below:

!
If in doubt,
Please feel free to
contact the HQ Legal
& Compliance
Team.

Code of Ethics



HMM Code of Ethics provides clear standards for decision-making and guides to act with integrity and fairness.

Anti-Bribery & Corruption Policy



This policy explains global anti-bribery & corruption laws, prohibited practices, and warning signs related to stakeholders.

Gift Management Guidelines



This guideline outline the actions employees must take when receiving gifts or benefits from stakeholders.

Gift and Monetary Item Receipt Report Form



If you receive gifts or benefits from stakeholders, you must complete the reporting form and upload it to the HMM ECMS portal.

Ethics Hotline, ECMS Hotline



Enable employees to anonymously raise concerns or report an incident.

2

Recognizing a Bribe



What is a bribe?

Bribe is the act of offering, giving, receiving, or agreeing to accept money or anything of value in order to improperly influence public officials or equivalents, or to gain an unfair advantage. It is strictly prohibited and violates both legal and ethical standards.



What are Facilitation payments?

Facilitation payments are small, unofficial payments or gifts made to expedite routine public or private individuals' actions, such as issuing permits, processing customs documents, or conducting inspections. In the context of ocean shipping, this may include payments or gifts offered to speed up administrative procedures by officials such as PSC (Port State Control) inspectors or quarantine officers. Common examples include cigarettes, small amounts of cash, or bottles of alcohol.

Despite their seemingly minor nature, facilitation payments are considered a form of bribery and are strictly prohibited under our Anti-Bribery & Corruption Policy.



What is duress?

Duress refers to any unlawful threat or pressure – whether against a person or property – intended to force someone to act against their will or interests.



What is extortion?

Extortion is the act of obtaining money, goods, or services from a person through coercion, threats, or abuse of power. Unlike duress, extortion typically involves a demand backed by intimidation, often with the intent to gain something of value unlawfully.

3

How to Act!

1

If you are faced with a situation where someone pressures you to provide money, gifts, or any item of value:



ACT

- ✓ **Respond politely** by saying: *"I am bound by HMM's Anti-Bribery & Corruption Policy, it is not my decision, I have to contact the company for approval."*
- ✓ **Ask for the basis of the request**, such as an official tariff, price list, fees or fines etc.
- ✓ If the request involves money, **ask that an official receipt** be issued to HMM.
- ✓ **Request to speak with a supervisor or manager**, or ask for their contact information.
- ✓ In some cases, the individual may withdraw the demand when questioned or when you are accompanied by a colleague or another witness.

RESIST

- ✓ **Firmly resist and refuse any demands** that lack clear explanation or transparency.
- ✓ Refer to HMM's Anti-Bribery & Corruption Policy.
- ✓ **Mention that HMM is a member of the MACN**, which upholds strict anti-corruption standards.



RECORD ▼

- ✓ **Record the situation** in a Statement of Facts in as much detail as possible.
- ✓ **Report the demand** to your direct manager and HQ Legal & Compliance Team. You may also contact the HMM Ethics Hotline or MACN Report channel.

2

If you experience duress or extortion:



ACT ▼

- ✓ Continue to engage calmly and **contact your direct manager** and HQ Legal & Compliance Team for guidance.
- ✓ If all other options are exhausted and the situation involves threats or safety concerns, you may comply as a last resort – but document the incident thoroughly.
- ✓ **Request an official receipt** for any payment made. This may discourage the individual from proceeding with the demand. If they refuse to sign the receipt, make a note about the payment and the situation.
- ✓ **Report to your direct manager** and contact the HMM Ethics Hotline or MACN Report channel.

RECORD

- ✓ Keep the receipt and detailed records on the incident.

3

Giving gifts or benefits:



ACT

- ✓ In accordance with the Ethics & Compliance Policy of ours, giving gifts or benefits to stakeholders is strictly prohibited in principle.
- ✓ If you intend to give gifts or benefits for the purpose of facilitating business operations, social interactions, or customary practices **within the limits permitted by relevant laws**, please ensure that any gift or benefit is:
 - **Reasonable** : related to legitimate business purposes and appropriate in context
 - **Proportionate** : not excessive in value and aligned with the nature of the business relationship
 - **Given in good faith** : offered without any intent to improperly influence a business decision

PROHIBITED ACTIONS

- ✓ Under no circumstances should you give a gift or benefit that does not meet the criteria outlined above.

✓ PRIOR-APPROVAL IS NEEDED ▼

- ✓ Extra caution is required when offering gifts or benefits to public officials, including government employees, members of the press, and school faculty.
- ✓ If you intend to give gifts or benefits for the purpose of facilitating business operations, social interactions, or customary practices **within the limits permitted by relevant laws**, you must first report to your direct manager and obtain prior approval from the HQ Legal & Compliance Team via HMM ECMS portal.

4

Receiving gifts or benefits:



💡 ACT ▼

- ✓ In accordance with the Ethics & Compliance Policy of ours, receiving gifts or benefits from stakeholders is strictly prohibited in principle.
- ✓ If you intend to receive gifts or benefits for the purpose of facilitating business operations, social interactions, or customary practices within the limits permitted by relevant laws, please ensure that any gift or benefit is:
 - **Reasonable** : related to legitimate business purposes and appropriate in context
 - **Proportionate** : not excessive in value and aligned with the nature of the business relationship
 - **Given in good faith** : offered without any intent to improperly influence a business decision

✕ DECLINE ▼

- ✓ Respectfully decline the items and clearly communicate the company's commitment to ethical business practices.
- ✓ In the event that a gift is received under unavoidable circumstances, you shall return the gift at the earliest opportunity including a designated *Gift Return Letter*.

📄 RECORD ▼

- ✓ If returning the gift is not feasible due to unavoidable circumstances – such as when the sender is unknown – you must report the item to your direct manager and upload the Gift and Monetary Item Receipt Form to the HMM ECMS portal for review by HQ Legal & Compliance Team.
- ✓ For details on the reporting procedure, please refer to the **HMM Gift Management Guidelines**.





HMM Co., Ltd.

Legal & Compliance Team

If you have any questions related
to Anti-Bribery & Anti-Corruption Handbook,
please feel free to contact us:

legal_compliance@hmm21.com

*We HMM stay compliant with Anti-Bribery &
Anti-Corruption Rules to do the right thing!*

Read more about
HMM Code of Ethics here:

