

Doc. ID: WWLQMS_13_542 Prepared by: C.O./ Compliance Manager Valid from: 2014-09-10 Global Acc.: MFS/GCO

Anti-Bribery & Anti-Corruption Policy

Document **responsible**:

WWL Compliance Officer

Global

To establish the framework for how WWL work against corruption in all its forms, including extortion and bribery

Scope of document: Key link to other documents:

- Code of Conduct (WWLQMS-13-807)
 - Compliance Policy (WWLQMS-13-709)
 - CA Accounting controls policy (WWLQMS-13-173)
 - CA Accounting policy (WWLQMS-13-174)
- CA Delegation of Authority Policy (WWLQMS-13-184)
- Procurement Policy (WWLQMS-13-548)
- Verification of Business Partners (WWLQMS-13-736)

Anti-Bribery & Anti-Corruption Policy

Wallenius Wilhelmsen Logistics is a worldwide provider of transportation and logistics management services. Our logistics services combine ocean-going transportation with around 60 specialized vehicle and RoRo vessels with inland activities such as vehicle processing, terminal management, stevedoring, storage and land-distribution.

Managing business risks is part of our commitment to deliver ethical, sustainable global transport solutions to our customers, and bribery are some of these risks. WWL is committed to work to prevent bribery from occurring in all activities under our effective control.

- Bribery in any form whether direct or indirect through third parties is prohibited.
- Any soliciting, arranging or accepting bribes intended for the employee's benefit or that of the employee's family, friends, associates or acquaintances is prohibited.
- WWL recognize that facilitation payments are bribes, and as such WWL is committed to work to identify and eliminate them.
- Offering or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of business transactions and are not reasonable and bona fide, is prohibited. Gifts or benefits received from or given to a supplier with a retail value of more than USD 200 shall be registered in the WWL «Gifts and gratitude» register (Procurement Portal).
- Neither WWL, nor its employees or agents should make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions.
- WWL shall make sure that charitable contributions and sponsorships are not used as a subterfuge for bribery.
- All employees in our company will be familiar with our Anti-Corruption & Anti-Bribery Policy.
- Our Anti-Corruption & Anti-Bribery Policy will be communicated to persons working for or on behalf of our company.

Purpose of document: