



The Anti-Bribery policy of The Japan Ship Owners' Mutual Protection & Indemnity Association

Published further to the passing of the United Kingdom's Bribery Act 2010 (the "Act").

1. Policy Statement

1.1 It is the policy of The Japan Ship Owners' Mutual Protection & Indemnity Association (the "Club") to conduct all its business in an honest and ethical manner. The Club takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever the Club operates and to implementing and enforcing effective systems to counter bribery.

1.2 The Club will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which the Club, its staff and all its associates operate.

1.3 The purpose of this policy is to:

1.3.1 set out the responsibilities of the Club and others in observing and upholding the Club's position on bribery and corruption; and

1.3.2 provide information and guidance to those working for the Club on how to recognise and deal with bribery and corruption issues.

1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the Club is found to have committed an offence could face an unlimited fine and face damage to its reputation. The Club therefore takes its legal responsibilities very seriously.

1.5 In this policy, third party means any individual or organisation doing business with the Club, or with whom a director or member of staff of the Club comes into contact during the course of their work for the Club, and includes actual and potential members, correspondents, brokers, lawyers, surveyors, customers, suppliers, business contacts, agents, service providers, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. In short if it is not legally permissible for the Club to perform a particular transaction, it is similarly impermissible for such third parties to do so in the course of their business relationship with the Club.

2. Who is covered by the policy?

This policy applies to all individuals working at all levels and grades within the Club, including directors, managers, group leaders, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, and any third party (as defined in 1.5 above).

3. What are the offences under the Act?

- 3.1 According to the Act, a bribery offence is committed where a financial or other advantage is given to encourage a person to perform his functions improperly, or where a person requests, agrees to receive or accepts a bribe.
- 3.2 There is also a separate offence of bribing a foreign public official in order to obtain or retain business or an advantage in the conduct of business. "Facilitation payments" (i.e small bribes or "grease payments" paid to facilitate routine government or official action) are prohibited under the Act. This is so no matter how small the payment or how well-established the practice is in any jurisdiction.
- 3.3 An offence can also be committed by commercial organisations which fail to prevent bribery committed on their behalf.
- 3.4 The Act has significant extra-territorial reach in that it applies to any company (ie a "commercial organisation") which does business or part of its business in the UK, wherever in the world it is incorporated, and will cover bribery offences committed outside the UK regardless of the nationality of the person committing the offence and regardless of where the bribery occurred.

4. Preventing and reporting bribery

- 4.1 All the directors and staff of The Japan Ship Owners' Mutual Protection & Indemnity Association and all those working on its behalf have a responsibility to prevent, detect and report bribery. The Club supports openness and any staff member or third party is encouraged to raise concerns with the Club about any suspicion of bribery or attempted bribery at the earliest possible stage. Such suspicion should be reported to the Compliance Officer of the Club, Takami Kobayashi, Executive Director (e-mail kobayashi-takami@piclub.or.jp , phone + 81 3 3662 7210). Any person raising a concern or reporting a suspicion may be safe in the knowledge that they do so in confidence and without risk of suffering any detrimental treatment.
- 4.2 Appropriate guidance is being provided to all those within the Club in fulfilling this duty. The Club expects similar standards from all suppliers, service providers and other third parties who act on behalf of the Club.