



Star MarinePro

**Star MarinePro
Quality Management System**

PREPARED BY:
LXW

APPROVED BY:
SW

ISSUE DATE:
14-03-2022

DOCUMENT NO:
SMP-M-PM19

REVISION NO:
1

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TITLE: Anti-corruption and Anti-bribery Procedures 反腐败反贿赂程序

1. Purpose

In order to ensure commercial equality and prohibit the occurrence of corrupt acts of commercial bribery, this procedure is formulated.

2. Scope of application

This procedure applies to all employees.

3. Responsibilities

3.1 The deputy general manager shall be responsible for supervision. If there is any bribery, shall be reported to the general manager in time, and the serious cases shall be dealt with by the judicial organ.

3.2 Personnel is responsible for handling employee and customer complaints. And provide guidance and support as necessary to senior manager for approval.

4. Working procedures:

4.1 Assist business partners and third parties in understanding the practical of our anti-corruption and anti-bribery procedures policies and procedures.

4.2 The company must avoid the payment of the dredging fee as much as possible and make unremitting efforts to eliminate the dredging fee.

4.3 The travel, meals, accommodation and entertainment provided by the Company (including frequency) must always be strictly related to the business and must not be extravagant. Except for business-related meals, expenses in excess of \$150 per recipient shall be reported to management for approval.

4.4 Employees may not ask for gifts, entertainment or hospitality. Employees can accept hospitality and banquets that are directly related to the business and of moderate value. With the exception of business-related banquets, employees must record gifts from outside stakeholders valued at more than \$150 in a registration book.

4.5 Accounts payable controls shall be fully implemented to ensure that the types and amounts of products and services invoiced are legitimate. They shall also comply with the instructions, prices and amounts listed in the contract and any other documents. All payments shall be authorized according to the invoice. Invoice numbers should be monitored to detect duplicate invoices.

4.6 Payroll responsibilities should be separated, i.e. different employees are responsible for data entry, authorization and payment. If changes to payroll documents are required, they should be approved by the non-changers. In addition, supporting documents must be provided. Payment reports should be evaluated regularly to ensure that only current employees receive pay checks from the company.

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4.7 All our financial books and records must accurately reflect and disclose the business rationale, purpose, substance and legality of all our local and cross-border transactions, payments and expenses, gifts and hospitality received or given to public officials, company employees and others.

4.8 All employees, business partners and third parties can access our website at www.star-marinepro.com.

4.9 Any problem, please contact the international number +86 21 5030 2068 / +86 13501828288 (General Manager - Ms. Wang Shilin) or send an email to sw@star-marinepro.com. The Deputy General Manager is responsible for investigating everything. If the case is true, the bribe taker should be punished or handed over to the relevant departments, and the result of the treatment should be informed to the employees.

4.10 Deviations from company rules can be an exception or a violation. Deviations can be allowed, called exceptions, or they can be disallowed, called violations. Exceptions may not be granted unless there are exceptional circumstances or the company's rules are clearly not applicable. Management shall request an exception in writing to the relevant General Manager. The General Manager shall evaluate and make a decision on each request. The assessment should consider both local and company-wide risks.

4.11 Exceptions shall be recorded by the Deputy General Manager.

4.12 Any violation of the Company's rules shall be reported to management as soon as possible. The deputy general manager must record the violation.

4.13 Violations may be subject to disciplinary action (e.g. reprimand, demotion, formal warning, dismissal or termination of employment contract) and/or any legal action. The Company will have the right to conduct audits or inspections of business partners and third parties who are alleged or reported to have violated our policies. If any business partner or third party with whom the Company has done business is found to have violated anti-corruption and anti-bribery laws or regulations or our policies, the contract may be terminated and, if necessary, legal proceedings initiated.

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TITLE: Anti-corruption and Anti-bribery Procedures 反腐败反贿赂程序

1. 目的

为了确保商业平等，禁止商业贿赂的腐败行为出现，特制定本程序。

2. 适用范围

本程序适用于所有员工。

3. 职责

3.1 副总经理负责监督，如有受贿情况及时上报总经理，对严重者交由司法机关处理。

3.1 人事负责处理员工、客户投诉。并提供指导和支持，必要时报高层经理批准。

4. 工作程序：

- 4.1 协助业务合作伙伴和第三方了解我们的反腐败反贿赂程序政策和程序的实用性。
- 4.2 业务部门必须尽量避免支付疏通费，并坚持不懈地努力消除疏通费。
- 4.3 公司提供的差旅、餐饮、住宿和娱乐活动（包括频率）必须始终与业务严格相关，不得奢侈。除与业务相关的用餐外，每位接受者超过 150 美元的费用应上报管理层批准。
- 4.4 员工不得索取礼品、娱乐或款待。员工可以接受与业务直接相关且价值适中的招待和宴请。除与业务相关的宴请外，员工必须在指定的登记簿中记录从外部利益相关方收到的价值超过 150 美元的馈赠。
- 4.5 应付账款控制措施应落实到位，以确保开具发票的产品和服务类型及金额合法。它们还应符合合同和任何其他文件中列出的说明、价格和金额。所有付款都应根据发票授权。应监控发票号码，以发现重复发票。
- 4.6 薪资职责应分开，即不同的员工负责数据录入、授权和付款。如果需要更改薪资文件，应由非更改人批准。此外，还必须提供证明文件。应定期评估付款报告，以确保只有在员工才能收到公司的工资支票。
- 4.7 我们的所有财务账簿和记录都必须准确反映并披露我们所有本地和跨境交易、付款和开支、收到或给予公职人员、公司员工及其他人员的礼品和招待的业务理由、目的、实质和合法性。
- 4.8 所有员工、业务合作伙伴和第三方均可随时通过合作伙伴和第三方可随时通过我们的网站 www.star-marinepro.com。
- 4.9 如需报告问题，请联系国际电话 +86 21 5030 2068 / +86 13501828288（总经理 - 王士琳女士）或发送电子邮件至 sw@star-marinepro.com 内，由副总经理负责对每件事都深入调查。如果事情属实，要对受贿者进行惩罚或交公安机关，并将处理结果告诉员工。
- 4.10 偏离公司规则可以是例外，也可以是违反。偏离可以是允许的，称为例外，也可以是不允许的，称为违反。除非存在特殊情况或公司规定明显不适用，否则不得批准例外。管理层应以书面形式向相关总经理提出例外请求。总经理应对每项请求进行评估并做出决定。评估应同时考虑当地和全公司的风险。
- 4.11 例外情况应由副总经理记录在案。
- 4.12 任何违反本公司规定的行为均应尽快报告管理层。副总经理必须将违反情况记录在案。
- 4.13 违规行为可能会受到纪律处分（如训斥、降职、正式警告、解雇或终止雇用合同）和/或任何法律诉讼。



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公司将有权对被指控或报告违反我们政策的业务合作伙伴和第三方进行审计或检查。如果发现与公司有业务往来的任何商业伙伴或第三方违反了反腐败反贿赂法律或法规或我们的政策，则可能会终止合同，并在必要时提起法律诉讼。

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