

FINAL ASSESSMENT

CHINA SHIPBUILDING INDUSTRY CORPORATION

(中国船舶重工集团公司)

The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

Topic	Number of questions	% score based on public information
Leadership, Governance and Organisation	10	5%
Risk Management	5	10%
Company Policy and Codes	12	0%
Training	5	30%
Personnel and Helplines	7	7.1%
Total	39	7.7%

TI has found no evidence that the company is involved in offsets and has therefore removed the two relevant questions (A13a and A13b).

A1:

Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company. TI notes the statement by the company's General Manager in the 2012 Social Responsibility Report. However, this is not considered to be a strong statement supporting the ethics and anti-corruption agenda of the company.

References:

Public:

TI notes:

Social Responsibility Report (2012), General Manager Statement:

<http://www.csic.com.cn/document/20130828084655343856.pdf>

A2:

Does the company's Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

References:

Public:

NA

A3:

Does the company's Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company's Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure.

References:

Public:
NA

A4:

Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score:

1

Comments:

Based on public information, there is limited evidence that the company publishes a statement of values representing high standards of business conduct, including honesty, trust, and integrity. However, the company goes into little detail about what these values mean for the company. The company therefore scores 1.

References:

Public:

Company Website:

'Group's core philosophy and culture of integrity:

Honest man, honest and trustworthy is the foundation of this, with dedication and hard work the company can only thrive.

Group's culture of integrity:

CSIC people act with honesty and integrity

People are educated with integrity and dedication

CSIC is an honest thriving enterprise'

<http://www.csic.com.cn/jtqyssh/zgqywh/>

A5:

Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption. TI notes that the company makes reference to the UN Global Compact and appears to use this as a performance benchmark for company compliance work. However, the company does not feature on the official list of participants of the UN Global Compact.

References:

Public:

TI notes:

2012 Social Responsibility Report, p.84:

<http://www.csic.com.cn/document/20130828084655343856.pdf>

A6:

Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda.

References:

Public:

NA

A7:

Has the company appointed a person at a senior level within the company to have responsibility for implementing the company's ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company's ethics and anti-corruption agenda.

References:

Public:

NA

A8:

Is there regular Board level monitoring and review of the performance of the company's ethics and anti-corruption agenda?

Score:

0

Comments:

Based on public information, there is no readily available evidence that there is regular Board level monitoring and review of the performance of the company's ethics and anti-corruption agenda.

References:

Public:
NA

A8(a) :

Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified ?

Score:

0

Comments:

Based on public information, there is no readily available evidence that there is a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, or evidence of improvement plans being implemented when issues are identified.

References:

Public:
NA

A9:

Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption.

References:

Public:

NA

A9(a):

Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide.

References:

Public:
NA

A10:

Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

References:

Public:
NA

A11:

Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

References:

Public:
NA

A12 :

Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption ?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption.

References:

Public:

NA

A13:

Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

1

Comments:

Based on public information, there is limited evidence that the company makes clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance. Evidence shows that illegal supplier are placed on a blacklist, suggesting that the consequences to breaching the company policies are made clear in practice. The company therefore scores 1.

References:

Public:

Social Responsibility Report (2012), p.50:

‘集团公司坚持公开，公平，公正的采购原则，强化原材料和外协件的质量管理。严格执行《关于选择供应商过程中预防商业贿赂的若干规定》，建立合格供应商信息库，供应商廉洁诺制度和供应商”黑名单“制度。

2012年，集团公司发布了新版违规供应商”黑名单“，76个单位建立了合格供应商信息库，135家违规供应商被列入黑名单。’

‘The Group adheres to open, fair and impartial procurement principles, strengthening quality management of raw materials and the Association. The Group strictly enforces the "vendor selection process on a number of provisions prevent commercial bribery" to establish an information database of qualified suppliers, vendors and suppliers: honest Novo regime "blacklist" system.

In 2012, the company released a new version of the offending supplier "blacklist", 76 units to establish a qualified supplier information database, 135 illegal suppliers were blacklisted.’

<http://www.csic.com.cn/document/20130828084655343856.pdf>

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[HTTP://WWW.CSIC.COM.CN/EN/](http://www.csic.com.cn/en/)

A13(a):

Does the company explicitly address the corruption risks associated with offset contracting?

Score:

NA

Comments:

Based on public information, there is no readily available evidence that the company engages in offset contracting.

References:

Public:
NA

A13(b):

Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

NA

Comments:

Based on public information, there is no readily available evidence that the company engages in offset contracting.

References:

Public:
NA

A15:

Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has an anti-corruption policy that prohibits corruption in its various forms. TI notes that evidence suggests that the company has an anti-corruption policy, but details are not provided.

References:

Public:

TI notes:

Social Responsibility Report (2012), pp.48-49:

‘集团公司继续深入贯彻党风廉政建设责任制，不断提高反腐倡廉工作科学化水平。

2012年，集团公司编制印发了新版责任书，集团公司主要领导与总部各部门，成员单位党政主要领导签订了责任书。

成员单位党风廉政建设领导小组研究工作295次，78个单位实行检查考核与奖惩挂钩，签订责任书6647份，考核2024个单位（部门），追究责任55人。

成员单位党风廉政建设领导小组研究工作295次

签订责任书6647份

考核2024个单位

反腐倡廉宣传教育持续开展。2012年，集团公司组织开展了以“遵纪守法，珍惜人生”为主题的反复唱廉宣传月活动，并编制印发《案例选编》，剖析法案原因，以案释法，以案施教。各成员单位结合实际，组织报告会，座谈会，观看警察教育片，参观廉政教育基地活动。全年廉政党课和反腐倡廉报告237场次，参与反腐倡廉宣传月活动人数达61202人。

同时，集团公司将宣传教育与廉洁风险防控有机结合，重点对高廉洁风险岗位人员开

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展廉洁 诺，强化廉洁从业意识。2012年廉洁 诺11033人，谈话提醒3187人次，诫勉谈话240人次， 372人上缴礼金，礼券和有价证券110万元。

反腐倡廉建设扎实开展。党风廉政建设责任制深入落实，廉洁风险防控机制不断健全。认真查办违法违纪案件，立案20件，25人受到纪律 分， 18 人被追究刑事责任，避免和挽回直接经济损失417万元。

全年廉政党课和反腐倡廉报告237场次
参与反腐倡廉宣传月活动人数达61202人’

‘Group companies continue to thoroughly implement the cleanliness and honesty, and continuously improve the scientific level of anti-corruption work.

In 2012, the company issued a new version of ‘the preparation of responsibility’, the principal leaders of the company with various departments, members of the unit, and main party leaders signed letters of responsibility.

Members of the unit clean government research work leading group of 295, 78 units censorship appraisal and reward linked to 6647 signed letters of responsibility, 2024 units (departments) assessed, 55 people held accountable.

295 members of the unit clean government research work leading group
6647 signed letters of responsibility
2024 units assessed

Ongoing anti-corruption education.

In 2012, the company organized an anti-corruption awareness month with "discipline is the law, cherish life" as the theme. Selected cases were chosen, analysed and taught. Each member of the unit attended practical, organized lectures, seminars, watched educational films, and visited the Independent education base activities. There were 237 independent anti-corruption lectures and screenings. The number of people involved in anti-corruption Awareness Month activities amounted to 61,202 people.

Meanwhile, the company will promote education and integrity risk control combined to focus on high-risk post personnel to carry out clean and honest commitment to strengthen the integrity of practitioners consciousness. 2012 clean year involved 11,033 people, being reminded about honest conversations 3187 times, 240 people were given admonishing remarks, and 372 people returned gifts, gift certificates and securities worth 1.1 million yuan.

Anti-corruption and Implementation.

Deep implementation of cleanliness, honesty, and integrity and continuously improve risk

control mechanisms. Seriously investigate and deal with law and discipline violations, filing 20, 25 people have been disciplined, 18 people were prosecuted for criminal liability, and 4.17 million yuan in direct economic losses.

237 independent anti-corruption lectures and screenings

Number of participants in anti-corruption awareness month 61,202 people

(p.50):

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<http://www.csic.com.cn/document/20130828084655343856.pdf>

A16:

Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company's anti-corruption policy is one of zero-tolerance.

References:

Public:
NA

A17:

Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company's anti-corruption policy is easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company.

References:

Public:
NA

A17(a):

Is the company's anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company's anti-corruption policy is easily understandable and clear to Board members, employees and third parties.

References:

Public:
NA

A18:

Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company's anti-corruption policy explicitly applies to employees and members of the Board.

References:

Public:
NA

A20:

Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a policy on potential conflicts of interest.

References:

Public:
NA

A21:

Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:

0

Comments:

Based on public information, there is insufficient evidence that the company has a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery. TI notes the the company has publicly declared that a number of employees have had to return received gifts. However, no further information on this policy is provided.

References:

Public:

TI notes:

Social Responsibility Report (2012), p.49:

‘Ongoing anti-corruption education.

In 2012, the company organized an anti-corruption awareness month with "discipline is the law, cherish life" as the theme. Selected cases were chosen, analysed and taught. Each member of the unit attended practical, organized lectures, seminars, watched educational films, and visited the Independent education base activities. There were 237 independent anti-corruption lectures and screenings. The number of people involved in anti-corruption Awareness Month activities amounted to 61,202 people.

Meanwhile, the company will promote education and integrity risk control combined to focus on high-risk post personnel to carry out clean and honest commitment to strengthen the integrity of practitioners consciousness. 2012 clean year involved 11,033 people, being reminded about honest conversations 3187 times, 240 people were given admonishing remarks, and 372 people returned gifts, gift certificates and securities worth 1.1 million yuan.’

<http://www.csic.com.cn/document/20130828084655343856.pdf>

A22:

Does the company's anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:

0

Comments:

Based on public information, there is no readily available evidence of a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery.

References:

Public:
NA

A23:

Does the company have a policy that explicitly prohibits facilitation payments?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:

Public:
NA

A24:

**Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?
Does the company record and publicly disclose all political contributions?**

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company prohibits political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:

Public:
NA

A25:

Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, or discloses the issues on which the company lobbies.

References:

Public:
NA

A25(a):

Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:

Public:
NA

A26:

Does the company provide written guidance to help Board members and employees understand and implement the firm's ethics and anti-corruption agenda?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm's ethics and anti-corruption agenda.

References:

Public:
NA

A27:

Does the company have a training programme that explicitly covers anti-corruption?

Score:

2

Comments:

Based on public information, there is evidence that the company has a training programme that explicitly covers anti-corruption. Evidence suggests that this takes place through an ongoing education process, which includes an anti-corruption awareness month.

References:

Public:

Social Responsibility Report (2012), pp.48-49:

'Group companies continue to thoroughly implement the cleanliness and honesty, and continuously improve the scientific level of anti-corruption work.

In 2012, the company issued a new version of 'the preparation of responsibility', the principal leaders of the company with various departments, members of the unit, and main party leaders signed letters of responsibility.

Members of the unit clean government research work leading group of 295, 78 units censorship appraisal and reward linked to 6647 signed letters of responsibility, 2024 units (departments) assessed, 55 people held accountable.

295 members of the unit clean government research work leading group

6647 signed letters of responsibility

2024 units assessed

Ongoing anti-corruption education.

In 2012, the company organized an anti-corruption awareness month with "discipline is the law, cherish life" as the theme. Selected cases were chosen, analysed and taught. Each member of the unit attended practical, organized lectures, seminars, watched educational films, and visited the Independent education base activities. There were 237 independent anti-corruption lectures and screenings. The number of people involved in anti-corruption

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Awareness Month activities amounted to 61,202 people.

Meanwhile, the company will promote education and integrity risk control combined to focus on high-risk post personnel to carry out clean and honest commitment to strengthen the integrity of practitioners consciousness. 2012 clean year involved 11,033 people, being reminded about honest conversations 3187 times, 240 people were given admonishing remarks, and 372 people returned gifts, gift certificates and securities worth 1.1 million yuan.

Anti-corruption and Implementation.

Deep implementation of cleanliness, honesty, and integrity and continuously improve risk control mechanisms. Seriously investigate and deal with law and discipline violations, filing 20, 25 people have been disciplined, 18 people were prosecuted for criminal liability, and 4.17 million yuan in direct economic losses.

237 independent anti-corruption lectures and screenings

Number of participants in anti-corruption awareness month 61,202 people'

<http://www.csic.com.cn/document/20130828084655343856.pdf>

A28:

Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

1

Comments:

Based on public information, there is evidence that anti-corruption training is provided to company employees. However, it is not explicitly clear if this training is provided in all countries where the company operates. The company therefore scores 1.

References:

Public:

Social Responsibility Report (2012), pp.48-49:

‘Ongoing anti-corruption education.

In 2012, the company organized an anti-corruption awareness month with "discipline is the law, cherish life" as the theme. Selected cases were chosen, analysed and taught. Each member of the unit attended practical, organized lectures, seminars, watched educational films, and visited the Independent education base activities. There were 237 independent anti-corruption lectures and screenings. The number of people involved in anti-corruption Awareness Month activities amounted to 61,202 people.

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4.17 million yuan in direct economic losses.

237 independent anti-corruption lectures and screenings

Number of participants in anti-corruption awareness month 61,202 people'

<http://www.csic.com.cn/document/20130828084655343856.pdf>

A29:

Does the company provide targeted anti-corruption training to members of the Board?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:

Public:
NA

A30:

Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:

Public:
NA

A31:

Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

References:

Public:
NA

A32:

Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score:

1

Comments:

Based on public information, there is some evidence that the company applies disciplinary procedures to individuals who have violated the company's rules and regulations. However, the company does not have an explicit commitment to apply disciplinary procedures, nor does it state that disciplinary procedures will be applied to Board members. The company therefore scores 1.

References:

Public:

Social Responsibility Report (2012), p.49:

'Meanwhile, the company will promote education and integrity risk control combined to focus on high-risk post personnel to carry out clean and honest commitment to strengthen the integrity of practitioners consciousness. 2012 clean year involved 11,033 people, being reminded about honest conversations 3187 times, 240 people were given admonishing remarks, and 372 people returned gifts, gift certificates and securities worth 1.1 million yuan.

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<http://www.csic.com.cn/document/20130828084655343856.pdf>

A33:

Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity.

References:

Public:
NA

A33(a):

Are the whistleblowing channels available to all employees in all geographies?

Score:

0

Comments:

Based on public information, there is no readily available evidence that whistleblowing channels are available to all employees in all geographies.

References:

Public:
NA

A33(b):

Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, or that whistleblowers are treated supportively.

References:

Public:

NA

A34:

Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues.

References:

Public:
NA

A35:

Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that there is a commitment to non-retaliation for bona fide reporting of corruption.

References:

Public:
NA

Information Sources:

Company Website:

<http://www.csic.com.cn/> [Chinese]

<http://www.csic.com.cn/en/> [English]

Corporate Social Responsibility Report (2012):

<http://www.csic.com.cn/document/20130828084655343856.pdf> [Chinese]

Corporate Social Responsibility Report (2011):

<http://www.csic.com.cn/document/20130828083845043736.pdf> [Chinese]