

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

CHINA STATE SHIPBUILDING CORPORATION (CSSC)

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
Leadership and Organisational Culture	4	1/8
2. Internal Controls	6	1/12
3. Support to Employees	7	0/14
Conflict of Interest	4	0/8
5. Customer Engagement	7	0/14
6. Supply Chain Management	5	0/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	2/8
10. State-Owned Enterprises	5	0/10
TOTAL		4 / 112
BAND		F

^{*}This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.



1. Leadership and Organisational Culture

Question

1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?

Score

1

Comments

There is some evidence that the company has a publicly stated commitment against corruption as part of its groupwide integrity standards. However, the company receives a score of '1' because it is not clear that the company's commitment is authorised and endorsed by the company's leadership.

Evidence

[1] 企业文化 / Company Culture (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n4/n17/index.html

集团廉洁文化核心理念:廉洁诚信 奉公兴业

清廉做人, 诚实守信是立业之本,只有克已奉公、同心同德,集团公司方能兴旺发达。

[...]

集团廉洁文化警言警句:

廉洁诚信 兴船为民

清风育人 诚信敬业

清正廉洁 强企兴船

廉洁亲和聚人心 国兴家兴万事兴

重诚守信共创伟业 克已奉公谱写人生

兴船报国诚信为本 创新超越廉洁护航

Translation:

The core concept of the Group's corporate culture is Integrity

Being honest and trustworthy is the foundation of the company. Only then can the company be publicly united, and the group company can flourish.

[...]

The company has standards of integrity:

To be honesty and act with integrity.

Serve the people.

To not engage in corruption.

We will work for the prosperity of the country.

[10] 中船重工召开固定资产投资建设领域廉洁风险防控座谈会 / Speech on Importance of Anti-Corruption Work (Webpage)

Accessed 08/10/2019

http://www.csic.com.cn/n6/n29/c7866/content.html



近日,中船重工2019年度固定资产投资建设领域廉洁风险防控宣贯暨招投标工作培训座谈会议(工业企业)在重庆召开,总结2018年固定资产投资建设领域廉洁风险防控工作情况,部署2019年重点工作。中船重工副总经理何纪武出席并讲话。国防科工局有关处室负责人出席并发言。

何纪武要求,要认真落实集团公司党组"**抓党建从工作出**发、抓工作从党建入手"的要求,持续加强党风廉政建设,持之以恒正风肃纪。要深化标本兼治,思想建设和制度建设两手抓,增强不想腐的思想自觉,扎牢不能腐的制度笼子,构建反腐倡廉长效机制,防范固定资产投资领域廉洁风险。

何纪武强调·要高度重视项目建设特别是招投标工作中的廉洁风险防控工作·贯彻"一岗双责"、落实"两个责任",坚持业务工作与廉政建设双抓双促进·把管业务、管廉政落到实处。要进一步提高项目建设的合规性水平·不仅要形式上的规范·更要求实质上的规范·提升项目管理合规性是政治上"讲规矩",行动上抓廉洁风险防控的重要举措。要切实将"立知立改"落到实处·将会议宣贯和培训的效果发挥出来。

会议邀请中国招标投标协会专家开展了招投标工作专题培训会,并针对进一步规范招投标管理工作进行了座谈。 集团公司有关部门及37家成员单位(工业企业)负责人参加会议。

Translation:

The company held a seminar in 2019 on the anti-corruption work and achievements in tackling corruption in the company's department managing fixed asset investments.

The company's Deputy General Manager stressed during a speech at the event the need for the whole company to continue anti-corruption work and to be self-disciplined. He called on all employees to reject corruption and work with integrity.



- 1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:
 - a) All employees, including staff and leadership of subsidiaries and other controlled entities;
 - b) All board members, including non-executive directors.

Score

0

Comments

Based on publicly available information, there is no evidence that the company has an anti-corruption policy. The company's website lists integrity and anti-corruption as core values, but there is no indication that the company has and publishes a comprehensive anti-bribery and corruption policy that applies to all employees and board members.

Evidence

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1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?

Score

0

Comments

There is no evidence that the company has an anti-corruption policy or programme, nor that a designated board committee or an individual board member is responsible for the company's anti-bribery and corruption activities.

Evidence

[4] 组织架构 / Group Structure (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n4/n14/index.html





1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?

Score

O

Comments

There is no evidence that the company publishes an anti-corruption policy, nor that a specific managerial-level employee has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme.

Evidence



2. Internal Controls

Question

2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?

Score

1

Comments

There is some evidence that the company has a formal risk assessment procedure in place that informs the design of its anti-bribery and corruption activities on an annual basis. The company indicates that it monitors and assesses the performance of its employees in implementing anti-corruption measures and there is evidence that it recognises the different corruption risks faced by employees in different positions. There is some evidence that the results of these assessments are used to make recommendations for management on how to better counter the corruption risks identified.

However, the company receives a score of '1' because there is no evidence that the company has a group-wide risk assessment procedure, rather than one targeted at specific employees or job roles. There is also no evidence that the company has a group-wide anti-bribery and corruption programme that is designed or adapted based on this procedure. Moreover, the company states that 'management' is responsible for reviewing the results of such assessments, but it is not clear that this includes board-level review.

Evidence

[9] **渤船集**团推进廉洁风险防控 / Corruption Risk Assessment and Control (Webpage) Accessed 08/10/2019

http://www.csic.com.cn/n6/n27/c7826/content.html

本刊讯(方凯)今年以来·渤船集团多项举措推进风险明确、监控有力、预警及时、处置得当的廉洁风险防控长效机制建设·构筑起前期预防、中期监控、后期处置的廉洁风险"三道防线"。

一是组织基层各单位根据工作岗位调整重新梳理排查廉洁风险点、廉洁风险岗位和廉洁风险人员。二是坚持与落实党风廉政建设责任制相结合,对已经排查出的廉洁风险点落实"一岗双责",与A、B、C三类风险等级人员签订《重点岗位人员廉洁自律承诺书》。三是制作"廉洁风险提醒卡",卡上体现岗位名称、风险等级、人员姓名、可能存在的廉洁风险,并摆放在相应工作岗位醒目之处。四是落实风险防控措施"回头看",各单位对廉洁风险防控专项活动中制定的风险防控措施的落实执行情况进行了梳理总结。五是根据公司下属59个二级单位的具体业务对党风廉政建设责任书进行修订,在责任条款中有针对性地加入了单位个性党风廉政建设责任条款,并重新签订。六是加强日常监控和动态管理,并将廉洁风险防控工作考核评估结果作为评价其落实党风廉政建设责任制的重要依据。

此外,公司各单位将于每年11月中旬对廉洁风险防控工作开展自查,形成自查报告。自查报告包括落实工作责任、推进工作情况、完成部署任务、取得实际成效以及存在的问题和整改措施等内容。各单位每年廉洁风险防控工作情况为向公司党委工作报告的重要内容之一,也是向本单位党员大会报告的重要内容之一。

纪委监察处对基层各单位廉洁风险防控工作情况进行抽查,并根据掌握的信访举报、案件查处、党风廉政建设责任制考核、年终述廉议廉民主测评等情况,督促调整、评定相关岗位廉洁风险等级。同时,将廉洁风险防控工作考核评估结果作为评价各单位落实党风廉政建设责任制的重要依据。将廉洁风险防控工作考核评估结果同党员干部个人年度考核工作相结合。对没有落实或问题多发、廉洁风险较大的单位,下发监察建议书或监察决定书,限期整改。

Translation:



During the last year, the company has supported initiatives to promote systems for corruption risk management. The company employs three lines of defence against corruption system: These include early warning systems, continuous monitoring and consistent punishment.

All departments of the company must identify corruption risks. The company will then work to manage and reduce these risks. The company identified three sorts of job responsibilities which have increased corruption risk. Those employees performing functions at a high risk of corruption will display a card at their place of work stating that their position is vulnerable to corruption. The company will periodically review and revise the list of these high-corruption risk positions. All 59 of the company's departments have a policy of employees signing agreements to not engage in corruption.

Every November every department in the company will produce a report on its work in tackling corruption. Management will also assess the success of the company's work in tackling corruption. The report will also contain recommendations for how to achieve progress and improvements in employees' working tasks.

Monitoring managers will perform random checks to assess the standard and consistency of anti-corruption work undertaken by the departments. They will also award each department a score based on their work in tackling corruption. The overall performance of the department will also be assessed. Departments whose work in reducing corruption risks is unsatisfactory and weak will be placed under closer monitoring and will be required to increase its work to reduce identified corruption risks.



2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?

Score

0

Comments

Based on publicly available information, there is no clear evidence that the company has an anti-bribery and corruption programme nor that this programme is subject to audit or review. There is some indication that the company reviews the risks facing employees in certain departments and positions, but there is no evidence that it has a group-wide programme which is subject to review on a regular basis.

Evidence

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此外,公司各单位将于每年11月中旬对廉洁风险防控工作开展自查·形成自查报告。自查报告包括落实工作责任、推进工作情况、完成部署任务、取得实际成效以及存在的问题和整改措施等内容。各单位每年廉洁风险防控工作情况为向公司党委工作报告的重要内容之一,也是向本单位党员大会报告的重要内容之一。

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2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?

Score

0

Comments

There is no evidence that the company has a publicly stated procedure for dealing with bribery and corruption allegations, incidents or whistleblowing reports.

Evidence



Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
There is no evidence that the company takes steps to assure itself of the quality of its internal investigations.
Evidence
No evidence found.



2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?

Score

0

Comments

There is no evidence that the company has an investigative procedure which includes a commitment to report material findings to the board or, if necessary, to the relevant authorities.

Evidence



2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?

Score

0

Comments

There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.

Evidence



3. Support to Employees

Question 3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages? Score Comments Based on publicly available information, there is no evidence that the company provides anti-bribery and corruption training to all employees. Evidence No evidence found.



- 3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:
 - a) Employees in high risk positions,
 - b) Middle management,
 - c) Board members.

Score

0

Comments

Based on publicly available information, there is no evidence that the company tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk. There is some indication that the company recognises the different corruption risks facing employees in different positions, but it is not clear that it provides training to employees to counter these risks.

Evidence

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3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?

Score

0

Comments

There is no evidence that the company measures or reviews the effectiveness of its anti-bribery and corruption communications or training programme.

Evidence



3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?

Score

0

Comments

There is no evidence that the company's incentive schemes for employees incorporate ethical or anti-bribery and corruption principles.

Evidence



Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
0
Comments
There is no evidence that the company commits to support or protect employees who refuse to act unethically.
Evidence
No evidence found.



3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?

Score

0

Comments

Based on publicly available information, there is no evidence that the company has a policy of non-retaliation against whistleblowers or employees who report bribery and corruption incidents.

Evidence



3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?

Score

O

Comments

There is no publicly available evidence that the company provides whistleblowing or advice channels for employees to report suspected incidents of corruption or seek advice on the company's anti-bribery and corruption activities.

Evidence



4. Conflict of Interest

Question		
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?		
Score		
0		
Comments		
Based on publicly available information, there is no evidence that the company has a policy or procedure regulating conflicts of interest.		
Evidence		
No evidence found.		



4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?

Score

n

Comments

There is no evidence the company has procedures to manage conflicts of interest or their oversight.

Evidence



4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector? Score Comments There is no evidence that the company has a policy regulating the employment of current or former public officials. Evidence No evidence found.



4.4. Does the company report details of the contracted services of serving politicians to the company?

Score

0

Comments

Based on publicly available information, there is no evidence that the company reports details of the contracted services of serving politicians.

Evidence



5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
Based on publicly available information, there is no evidence that the company has a policy on corporate political contributions.
Evidence
No evidence found.



Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
0
Comments
There is no evidence that the company discloses any details of its political contributions.
Evidence
No evidence found.



5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?

Score

n

Comments

There is no evidence that the company has a policy on charitable donations or sponsorships, nor that it discloses details of any such donations made. The company provides some information on community projects that it supports, but it is not clear whether these are charitable donations or part of broader agreements.

Evidence

[2] 中船重工助力勐腊丘北两县脱贫攻坚成效显著 / Poverty Alleviation Programme (webpage) Accessed 30/09/2019

http://www.csic.com.cn/n8/n55/c7578/content.html

中船重工助力勐腊丘北两县脱贫攻坚成效显著

4月24日,记者从中船重工**2019年定点扶**贫工作会了解到·过去一年·中船重工认真贯彻落实党中央、国务院国资委脱贫攻坚决策部署·紧紧围绕精准扶贫、精准脱贫·进一步强化组织领导、完善工作机制·创新产业扶贫新**模式**,**多措并**举提高扶贫成效·人力财力投入同比大幅增长·超额完成定点扶贫责任书各项任务·在助力勐腊县、丘北县脱贫攻坚工作中取得显著成效。

本次会议深入学习习近平总书记近期在第6次跨省区脱贫攻坚专题会议和中央财经委员会第4次会议上关于脱贫攻坚工作的最新指示,贯彻落实党中央、国务院国资委关于中央单位定点扶贫工作的最新要求,研究部署2019年中船重工定点扶贫重点任务。中船重工副总经理何纪武出席会议并讲话。

何纪武表示,2019年是新中国成立70周年,也是打赢脱贫攻坚战的关键一年,中船重工将继续按照习近平总书记的指示精神,真扶贫、扶真贫,一帮一、一对红,摘帽不摘责任、摘帽不摘帮扶,与两县广大干部群众携手并肩,高质量完成各项定点扶贫任务,共同夺取脱贫攻坚战新胜利。要聚焦脱贫攻坚任务,进一步加大投入力度。要聚焦"两不愁三保障",进一步深耕精准帮扶。要动员更多力量,构建产业帮扶长效机制。要坚持扶贫同扶志扶智相结合,增强干部群众脱贫致富的内生动力和自我发展能力。要坚持短期帮扶和长期帮扶相结合,增强可持续发展能力。

何纪武强调,定点扶贫是新时代中船重工重要政治任务,要加强组织保障。要提高思想认识,落实定点帮扶责任。 挂职干部要认真履责,发挥桥梁纽带作用。要充分发挥基金公司专业团队力量。要加强作风建设,扎实推进扶贫各项工作。要营造良好舆论氛围,动员引导广**大干部**职工参与扶贫。

会议讨论审议了《中船重工2019年**定点扶**贫工作计划》·勐腊县、丘北县分别作了脱贫攻坚情况报告·太证资本作了产业扶贫基金情况报告。

中船重工董事会秘书刘郑国、总经理助理杨乾坤、有关部门和单位负责人,国资委综合局社会责任处张晓松处长, 西双版纳州委常委、副州长杜寒冰,勐腊县、丘北县以及太证资本主要领导参加会议。

Translation:

China Shipbuilding Heavy Industry has helped two regions in the northern part of the country to achieve poverty alleviation



On April 24, the reporter learned of the 2019 fixed-point poverty alleviation work of CSIC. In the past year, CSIC seriously implemented the decisions and implementation of the Party Central Committee and the State-owned Assets Supervision and Administration Commission for poverty alleviation, focusing on precision poverty alleviation. This included organizing leadership, improving working mechanisms, and finding innovations in new models for poverty alleviation in the industry, as well as improving measures to alleviate poverty, increasing human and financial resources, and exceeding the tasks of the designated poverty alleviation responsibility book, achieving significant results.

At a recent meeting an in-depth study was presented of the latest instructions of General Secretary Xi Jinping in the 6th Inter-provincial Poverty Alleviation Conference and the 4th meeting of the Central Committee of Finance and Economics on the work of poverty alleviation and the implementation of the Party Central Committee and the State Council SASAC on central government targeted poverty alleviation. The meeting heard a presentation on the latest requirements of the work, research and deployment of the 2019 China Shipbuilding Heavy Industry targeted poverty alleviation key tasks. He Jiwu, deputy general manager of CSIC, attended the meeting and delivered a speech.

He Jiwu said that 2019 is the 70th anniversary of the founding of New China, and it is also a crucial year for winning the battle against poverty. CSIC will continue to follow the spirit of General Secretary Xi Jinping, really helping the poor, helping the poor, one-on-one, one pair of red, Uncap the hat, pick up the hat, pick up the hat and don't pick up the help, and join hands with the broad masses of cadres and the masses in the two counties to complete the various tasks of poverty alleviation and win the new victory in poverty alleviation. We must focus on the task of getting rid of poverty and further increase investment. It is necessary to focus on "two guarantees and three guarantees" and further deepen the precision assistance. We must mobilize more power and build a long-term mechanism to help the industry. It is necessary to adhere to the combination of poverty alleviation and supportive and supportive intelligence, and enhance the endogenous motivation and self-development ability of cadres and the masses to get rid of poverty and become rich. We must adhere to the combination of short-term assistance and long-term assistance to enhance the capacity for sustainable development.

He Jiwu emphasized that fixed-point poverty alleviation is an important political task for shipbuilding in the new era, and it is necessary to strengthen organizational security. It is necessary to raise awareness of ideas and implement fixed-point support responsibilities. The cadres who work in the post must conscientiously perform their duties and play the role of bridges. It is necessary to give full play to the professional team strength of the fund company. It is necessary to strengthen the work style construction and solidly promote all aspects of poverty alleviation. We must create a good atmosphere for public opinion and mobilize and guide the broad masses of cadres and workers to participate in poverty alleviation.

The meeting discussed and reviewed the "Shuttle Heavy Industry Work Plan for Poverty Alleviation in 2019", and Mengla County and Qiubei County respectively reported the situation of poverty alleviation, and Taizheng Capital made a report on the industrial poverty alleviation fund.

Chairman of the Board of Directors of CSIC Liu Zhenguo, Assistant General Manager Yang Qiankun, person in charge of relevant departments and units, Director Zhang Xiaosong of the Social Responsibility Department of the State-owned Assets Supervision and Administration Commission, Xishuangbanna State Party Standing Committee, Deputy Governor Du Hanbing, Mengla County, Qiubei County and Taizheng Capital The main leaders attended the meeting.

[6] 用心铺就精准扶贫幸福路 / On Poverty Alleviation Work (webpage) Accessed 30/09/2019

http://www.csic.com.cn/n6/n30/c7614/content.html

用心铺就精准扶贫幸福路——胡问鸣赴云南丘北县推进精准扶贫工作

5月14日,中船重工党组书记、董事长、扶贫工作领导小组组长胡问鸣率队到集团公司定点扶贫县云南省丘北县推进 精准扶贫工作。中船重工副总经理、扶贫工作领导小组副组长何纪武,文山州委常委、常务副州长贺勇等一同参加活动。

胡问鸣一行来到丘北县深度贫困村曰者镇蒲草塘村·检查了蒲草塘村的进村道路建设情况。绿色的护栏、灰白的水泥路、红褐的土壤,中船重工援建的进村道路如一条美丽的彩虹蜿蜒在崇山峻岭之间,打通了蒲草塘村村民脱贫致富的幸福路。在蒲草塘村,胡问鸣与村民亲切交谈,调研蒲草塘村集体经济情况,并就推进村集体经济产业发展提出具体



意见和建议。随后,胡问鸣一行马不停蹄调研了玫瑰花产业发展情况、智慧停车场建设情况等后续帮扶产业项目,参加了中船重工工会农产品采购活动。

胡问鸣表示,精准扶贫、精准脱贫,小康路上一个不能少,这是习近平总书记以人民为中心的发展思想最深刻、最集中、最生动的体现和阐释。一路走来,看到丘北县党员干部群众在县委、县政府的带领下,为实现脱贫摘帽、全面建设小康社会奋力拼搏的精神面貌和取得的脱贫成效,看到村民开心的笑脸,感到由衷地高兴。

然而,脱贫攻坚犹如爬坡翻山,越往后越难。2019年是勐腊县的脱贫摘帽巩固年,丘北的脱贫摘帽年,中船重工将继续一如既往,按照习近平总书记的指示和党中央、国务院的要求,聚焦脱贫攻坚任务,聚焦"两不愁三保障"短板弱项,与两县广大干部群众携手并肩打赢这场扶贫攻坚战。

蒲草塘村村民走上了致富路,盖上了新房

在随后召开的中船重工消费扶贫助力脱贫攻坚推进会暨采购协议签订仪式上,胡问鸣与相关负责人一起,共同见证了中船重工物贸集团与丘北县政府、勐腊县政府签订消费扶贫采购协议。2019年,中船重工计划采购丘北县、勐腊县农产品总金额超过2000万元,同比增长120%,超额完成各项定点扶贫任务。据统计,此次集团公司工会共组织了40余家成员单位工会负责人来丘北开展消费扶贫专项调研。

在中船重工·丘北县的定点扶贫座谈会上·结合丘北县发展规划·胡问鸣对2019年中船重工计划重点推进工作提出了具体要求。一是提高政治站位·把本次消费扶贫工作提高到落实党中央、国务院脱贫攻坚决策部署上来·助力脱贫攻坚是央企应尽的义务和责任·要集全集团之力、助力两县打赢脱贫攻坚战。二是切实发挥工会在扶贫工作中的作用。三是中船物贸要做好服务保障。四是组织动员更多力量参与定点扶贫。

丘北县委书记秦文波、县长杨波代表丘北县全体干部群众对中船重工的真诚帮扶、倾情援助表示感谢。他们表示,丘 北县全体干部群众将进一步落实产业项目,坚定信心,创新举措,苦干实干,培育内生动力,形成长效机制,如期圆 满完成贫困县脱帽的目标,以此回馈中船重工的深情厚意和殷切期望。

产业扶贫基金管理人、太平洋证券股份有限公司党委书记聂愿牛,集团公司有关部门和成员单位负责人参加以上活动

Translation:

Focusing on the road to precision poverty alleviation - Hu Wenming went to Qiubei County, Yunnan Province to promote targeted poverty alleviation

On May 14th, Hu Wenming, the secretary of the China Shipping Heavy Industry Party Group, the chairman of the board of directors, and the leader of the poverty alleviation working group, led the team of the group company to set up a poverty alleviation working group in Qiubei County, Yunnan Province. He Jiwu, deputy general manager of CSIC and deputy leader of the poverty alleviation work leading group, and He Yong, member of the Standing Committee of Wenshan State Committee and executive deputy governor, attended the event.

Hu Wenming and his entourage came to Pucaotang Village, Yuzhe Town, a deeply impoverished village in Qiubei County, and inspected the construction of the village road in Pucaotang Village. Green guardrails, gray cement roads, reddish-brown soils, and the village roads built by CSIC Heavy Industries, such as a beautiful ridge between the mountains and mountains, opened up a road for which the villagers in Pucaotang Village are grateful and see as a route to alleviation from poverty. In Pucaotang village, Hu Wenming had a cordial conversation with the villagers to investigate the collective economic situation of the village and put forward specific opinions and suggestions on promoting the development of the village collective economic industry. Subsequently, Hu Wenming and his entourage investigated the development of the rose industry, the construction of smart parking lots and other follow-up assistance industry projects, and participated in the agricultural procurement activities of CSIC.

Hu Wenming said that targeted poverty alleviation and precision poverty alleviation cannot be considered unimportant. This is the most profound, concentrated and vivid interpretation of the development philosophy of General Secretary Xi Jinping. Along the way, Wenming saw the party members and cadres of Qiubei County, under the leadership of the county party committee and the county government, observing the spirit of hard work and poverty alleviation and the villagers' sincerely happy smiles.

However, getting rid of poverty is like climbing a hill, and the harder it is. In 2019, it was the year of poverty alleviation and cap removal in Mengla County. In the year of Qiubei's poverty alleviation, China Shipbuilding Heavy



Industry will continue to follow the instructions of General Secretary Xi Jinping and the requirements of the Party Central Committee and the State Council, focusing on the task of poverty alleviation. Party cadres and the masses of the two counties have joined hands to win this battle against poverty.

The villagers of Pucaotang Village took the road to prosperity and built a new house. At the signing ceremony of the China Shipbuilding Heavy Industry Poverty Alleviation and Poverty Alleviation Conference and Purchase Agreement, Hu Wenming and the relevant responsible persons witnessed the signing of the consumption by CSIC Heavy Industries and Trade Group and Qiubei County Government and Mengla County Government. Poverty alleviation procurement agreement. In 2019, CSIC plans to purchase the total amount of agricultural products in Qiubei County and Mengla County to exceed 20 million yuan, a year-on-year increase of 120%, and overfulfill all fixed-point poverty alleviation tasks. According to statistics, the trade union of the group company organized a total of more than 40 member units of the labor union responsible for Qiubei to carry out special research on consumer poverty alleviation.

At the fixed-point poverty alleviation forum of CSIC·Qiubei County, held jointly alongside the presentation of the development plan of Qiubei County, Hu Wenming put forward specific requirements for the key promotion work of the CSIC Heavy Industry Plan in 2019. The first goal was stated as strengthening policy commitments, to raise poverty alleviation work to the implementation of the decision-making and implementation of the Party Central Committee and the State Council for poverty alleviation, and help poverty-stricken enterprises to fulfill their obligations and responsibilities. It is necessary to gather the strength of the whole group and help the two counties to win in the struggle against poverty. The second goal is to give full responsibility to trade unions in poverty alleviation. Third, the China Shipbuilding Industry Corporation should do a good job in guaranteeing services. The fourth goal is to organize and mobilize more forces to participate in targeted poverty alleviation.

Qin Wenbo, secretary of the Qiubei County Party Committee, and Yang Bo, the county magistrate, expressed their gratitude to all the cadres and masses of Qiubei County for their sincere help and assistance to CSIC. They said that all the cadres and masses in Qiubei County will further implement the industrial projects, strengthen their confidence, innovate their measures, work hard, cultivate endogenous power, form a long-term mechanism, and successfully complete the goal of uncapitalization in poverty-stricken counties, so as to give back to CSIC. Deep affection and ardent expectations.

Manager of the Industrial Poverty Alleviation Fund, Secretary of the Party Committee of Pacific Securities Co., Ltd. Nie Yuanniu, responsible persons of relevant departments and member units of the group company participated in the above activities.

[The company's website contains various articles similar in style and content to [2] and [6] regarding charitable activities]



5.2 Lobbying

Question		
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?		
Score		
0		
Comments		
There is no publicly available evidence that the company has a policy or procedure on lobbying.		
Evidence		
No evidence found.		



5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?

Score

0

Comments

There is no publicly available evidence that the company publishes any information on its lobbying aims, topics or activities.

Evidence



Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
There is no evidence that the company provides any details about its global lobbying expenditure.
Evidence
No evidence found.



5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
0
Comments
There is no publicly available evidence that the company has a policy or procedure on gifts and hospitality.
Evidence
No evidence found.



6. Supply Chain Management

Question	
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?	
Score	
0	
Comments	
There is no evidence that the company requires the involvement of its procurement department in the establishment or oversight of its supplier base.	
Evidence	
No evidence found.	



Question						
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or reengaging with its suppliers?						
Score						
0						
Comments						
There is no evidence that the company conducts anti-bribery and corruption due diligence on its supply chain.						
Evidence						
No evidence found.						



6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?

Score

U

Comments

There is no publicly available evidence that the company ensures that its suppliers have anti-bribery and corruption policies in place that meet a high standard.

Evidence



6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?

Score

O

Comments

There is no evidence that the company takes steps to ensure that anti-bribery and corruption procedures and standards are required throughout the supply chain.

Evidence



6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?

Score

0

Comments

There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.

Evidence



7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question						
7.1.1 Does the company have a clear policy on the use of agents?						
Score						
0						
Comments						
There is no publicly available evidence that the company has a policy on the use of agents.						
Evidence						
No evidence found.						



7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?

Score

n

Comments

There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries.

Evidence



7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?

Score

0

Comments

There is no evidence that the company aims to establish the beneficial ownership of its agents, nor that it commits to not engaging or terminating its engagement with agents or intermediaries if beneficial ownership cannot be established.

Evidence



7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?

Score

0

Comments

There is no publicly available evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries to detect, control and prevent breaches of its policy.

Evidence



Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company considers incentive structures as a risk factor in agent behaviour.
Evidence
No evidence found.



Question 7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company? Score Comments

There is no evidence that the company publishes any details of the agents currently contracted to act for or on its behalf.

Evidence

against agents?



Question 7.1.7 Does the company publish high-level results from incident investigations and sanctions applied

Score

n

Comments

There is no evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving agents.

Evidence



7.2 Joint Ventures

Question							
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?							
Score							
0							
Comments							
There is no evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures.							
Evidence							
No evidence found.							



7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?

Score

0

Comments

There is no evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures, nor that it requires anti-bribery and corruption clauses in its contracts with joint venture partners.

Evidence



7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?

Score

0

Comments

There is no evidence that the company publicly commits to take an active role in preventing bribery and corruption in all of its joint ventures.

Evidence



8. Offsets

Question

8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?

Score

0

Comments

There is no evidence that the company addresses the corruption risks associated with offset contracting, nor that a dedicated department, body or team is responsible for oversight of the company's offset programme.

Evidence



8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?

Score

n

Comments

There is no evidence that the company conducts risk-based anti-bribery and corruption due diligence on its offset obligations.

Evidence



8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?

Score

0

Comments

There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf its offset programme.

Evidence



Question							
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?							
Score							
0							
Comments							
There is no evidence that the company publishes any details of its offset obligations and/or contracts.							
Evidence							
No evidence found.							



9. High Risk Markets

Question

9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?

Score

0

Comments

There is no publicly available evidence that the company acknowledges the corruption risks of operating in different markets or that risk assessment procedures are used to inform its operations in high risk markets. Although the company primarily operates in China, there is no clear evidence to suggest that this is the only market in which it operates. There is some indication that the company has risk management procedures in place for employees in certain positions, but there is no evidence that this is based on an assessment of the market risk.

Evidence

[9] **渤船集**团推进廉洁风险防控 / Corruption Risk Assessment and Control (Webpage) Accessed 08/10/2019

http://www.csic.com.cn/n6/n27/c7826/content.html

本刊讯(方凯)今年以来·渤船集团多项举措推进风险明确、监控有力、预警及时、处置得当的廉洁风险防控长效机制建设·构筑起前期预防、中期监控、后期处置的廉洁风险"三道防线"。

一是组织基层各单位根据工作岗位调整重新梳理排查廉洁风险点、廉洁风险岗位和廉洁风险人员。二是坚持与落实党风廉政建设责任制相结合,对已经排查出的廉洁风险点落实"一岗双责",与A、B、C三类风险等级人员签订《重点岗位人员廉洁自律承诺书》。三是制作"廉洁风险提醒卡",卡上体现岗位名称、风险等级、人员姓名、可能存在的廉洁风险,并摆放在相应工作岗位醒目之处。四是落实风险防控措施"回头看",各单位对廉洁风险防控专项活动中制定的风险防控措施的落实执行情况进行了梳理总结。五是根据公司下属59个二级单位的具体业务对党风廉政建设责任书进行修订,在责任条款中有针对性地加入了单位个性党风廉政建设责任条款,并重新签订。六是加强日常监控和动态管理,并将廉洁风险防控工作考核评估结果作为评价其落实党风廉政建设责任制的重要依据。

此外,公司各单位将于每年11月中旬对廉洁风险防控工作开展自查,形成自查报告。自查报告包括落实工作责任、推进工作情况、完成部署任务、取得实际成效以及存在的问题和整改措施等内容。各单位每年廉洁风险防控工作情况为向公司党委工作报告的重要内容之一,也是向本单位党员大会报告的重要内容之一。

纪委监察处对基层各单位廉洁风险防控工作情况进行抽查,并根据掌握的信访举报、案件查处、党风廉政建设责任制考核、年终述廉议廉民主测评等情况,督促调整、评定相关岗位廉洁风险等级。同时,将廉洁风险防控工作考核评估结果作为评价各单位落实党风廉政建设责任制的重要依据。将廉洁风险防控工作考核评估结果同党员干部个人年度考核工作相结合。对没有落实或问题多发、廉洁风险较大的单位,下发监察建议书或监察决定书,限期整改。

Translation:

During the last year, the company has supported initiatives to promote systems for corruption risk management. The company employs three lines of defence against corruption system: These include early warning systems, continuous monitoring and consistent punishment.

All departments of the company must identify corruption risks. The company will then work to manage and reduce these risks. The company identified three sorts of job responsibilities which have increased corruption risk. Those



employees performing functions at a high risk of corruption will display a card at their place of work stating that their position is vulnerable to corruption. The company will periodically review and revise the list of these high-corruption risk positions. All 59 of the company's departments have a policy of employees signing agreements to not engage in corruption.

Every November every department in the company will produce a report on its work in tackling corruption. Management will also assess the success of the company's work in tackling corruption. The report will also contain recommendations for how to achieve progress and improvements in employees' working tasks.

Monitoring managers will perform random checks to assess the standard and consistency of anti-corruption work undertaken by the departments. They will also award each department a score based on their work in tackling corruption. The overall performance of the department will also be assessed. Departments whose work in reducing corruption risks is unsatisfactory and weak will be placed under closer monitoring and will be required to increase its work to reduce identified corruption risks.



9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?

Score

1

Comments

There is evidence that the company publishes a list of its subsidiaries on its website, which all appear to be based in China.

However, the company receives a score of '1' because it does not publish accompanying details for each entity such as percentage ownership, country of operation or country of incorporation. As a result, it is not clear whether the companies listed are principal or significant subsidiaries, joint ventures or other affiliated entities, and it is not clear that this list represents all of the company's holdings. In addition, the company's data includes no information on percentage ownership, incorporation or countries of operation. There is also no clear indication that the data is updated on an annual basis.

Evidence

[5] 我们的企业 / About the Company (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n4/n12/index.html

中国船舶重工集团有限公司(简称中船重工·CSIC)成立于1999年7月1日,是由原中国船舶工业总公司部分企事业单位重组成立的特大型国有企业·是国家授权投资的机构和资产经营主体·主要从事海洋装备产业、动力与机电装备产业、战略新兴产业和生产性现代服务业的研发生产·2017年已连续7年入选世界500强企业·排名第233位,位居全球船舶企业首位。拥有上市平台公司5家,二级成员单位84家,其中二级企业54家,科研院所28家,境外机构18家,总资产4400亿元·员工17万人。

Translation:

China Shipbuilding Industry Corporation (CSIC) was established on July 1, 1999. It is a large state-owned enterprise reorganized by some enterprises and institutions of the former China National Shipbuilding Corporation. It is a state-authorized investment institution. The chief body of asset management is mainly engaged in the research and development of marine equipment, power and electromechanical industrial equipment, strategic emerging industrial products and productive modern services for industry. In 2017, it was selected as one of the world's top 500 enterprises for 7 consecutive years, ranking 233th, ranking among ships worldwide. The first place in business. It has 5 main companies and 84 subsidiaries, 28 research institutes and 18 overseas institutions with total assets of 440 billion yuan and 170,000 employees.

[4] 组织架构 / Group Structure (Webpage) Accessed 30/09/2019

http://www.csic.com.cn/n4/n14/index.html





[3] 下属单位 / Subsidiary Companies (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n11/index.html

下属单位

- 中国船舶重工股份有限公司
- 中国船舶重工集团动力股份有限公司
- 中国船舶重工集团海洋防务与信息
- 对抗股份有限公司
- 中国船舶重工集团应急预警与救援
- 装备股份有限公司
- 湖北久之洋红外系统股份有限公司
- 中国舰船研究院
- 中国舰船研究设计研究中心
- 中国船舶科学研究中心
- 哈尔滨船舶锅炉涡轮机研究所
- **上海船舶设备研究所**
- 西安精密机械研究所
- 天津航海仪器研究所
- 武汉数字工程研究所
- 宜昌测试技术研究所
- 上海船用柴油机研究所
- 武汉船用电力推进装置研究所



郑州机电工程研究所

船舶信息研究中心

杭州应用声学研究所

江苏自动化研究所

华中光电技术研究所

邯郸净化设备研究所

武汉第二船舶设计研究所

武汉船舶通信研究所

扬州船用电子仪器研究所

南京船舶雷达研究所

洛阳船舶材料研究所

上海船舶电子设备研究所

[List continues to name approx. 100 affiliated companies]

Translation:

subordinate units

China Shipbuilding Industry Co., Ltd.

China Shipbuilding Heavy Industry Group Co., Ltd.

China Shipbuilding Industry Group Marine Defence and Information

Countermeasure Co., Ltd.

China Shipbuilding Industry Group Emergency Early Warning and Rescue

Equipment Co., Ltd.

Hubei Jiuzhiyang Infrared System Co., Ltd.

China Ship Research Institute

China Ship Research and Design Research Centre

China Ship Science Research Centre

Harbin Ship Boiler Turbine Research Institute

Shanghai Ship Equipment Research Institute

Xi'an Precision Machinery Research Institute

Tianjin Marine Instrument Research Institute

Wuhan Institute of Digital Engineering

Yichang Testing Technology Research Institute

Shanghai Marine Diesel Engine Research Institute

Wuhan Marine Electric Propulsion Plant Research Institute

Zhengzhou Institute of Mechanical and Electrical Engineering

Ship Information Research Centre

Hangzhou Institute of Applied Acoustics

Jiangsu Institute of Automation

Huazhong Photoelectric Technology Research Institute

Handan Purification equipment research institute

Wuhan Second Ship Design Institute

Wuhan Ship Communication Research Institute

Yangzhou Marine Electronic Instrument Research Institute

Nanjing Ship Radar Research Institute

Luoyang Ship Materials Research Institute

Shanghai Ship Electronic Equipment Research Institute

[List continues to name approx. 100 affiliated companies]



9.3 Does the company disclose its beneficial ownership and control structure?

Score

1

Comments

There is some evidence that the company is a state-owned enterprise in China. The company receives a score of '1' because it does not provide further information on its beneficial ownership and this information is not disclosed in open data format.

Evidence

[5] 我们的企业 / About the Company (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n4/n12/index.html

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Question							
9.4 Does the company publish a percentage breakdown of its defence sales by customer?							
Score							
0							
Comments							
There is no evidence that the company publishes information about its major defence sales or customers.							
Evidence							
No evidence found.							



10. State-Owned Enterprises (SOEs)

10.1 Does the SOE publish a breakdown of its shareholder voting rights?							
Score							
0							
Comments							
There is no evidence that the company publishes details of its shareholder voting rights. Although the company states that it is a state-owned enterprise, it does not provide clear ownership information and therefore it is not clear whether the Chinese government is the sole owner of shares or voting rights.							
Evidence							
No evidence found.							



10.2 Are the SOE's commercial and public policy objectives publicly available?

Score

0

Comments

The company publishes some information on its areas of business activity and services. However, the company receives a score of '0' because it does not publish clear details of its commercial or public policy objectives and there is no evidence that this information is updated on an annual basis.

Evidence

[5] 我们的企业 / About the Company (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n4/n12/index.html

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[7] 业务综述 / Business Review (Webpage)

Accessed 30/09/2019

http://www.csic.com.cn/n7/n37/index.html

业务综述

中船重工在军船领域有着先进的科研、生产手段和强大的自主创新开发能力,能承接潜艇、导弹驱逐舰、导弹护卫舰、导弹快艇、两栖舰艇和各种水中兵器、舰载武器与舰用电子设备及各种军用桥梁的设计制造与售后服务。并可根据用户要求,进行国外装备引进、 **合作生**产、舰艇改装和修理业务。

Translation:

Business review

CSIC has advanced research and production methods and strong independent innovation and development capabilities in the field of military vessels. It can construct submarines, guided missile destroyers, missile frigates, missile-carrying speedboats, amphibious ships and various underwater weapons, shipborne weapons and marine electronics. The company is also engaged in the design, manufacture and after-sales service of equipment and various kinds of military bridges. Based on user requirements, foreign equipment introduction, cooperative production, ship modification and repair services can all be carried out.



10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?

Score

O

Comments

There is no evidence that the company makes any information about its board members or the nomination and appointment process publicly available.

Evidence



Question						
10.4 Is the SOE's audit committee composed of a majority of independent directors?						
Score						
0						
Comments						
There is no evidence that the company has an audit committee that is composed of a majority of independent directors.						
Evidence						
No evidence found.						



Question						
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?						
Score						
0						
Comments						
There is no evidence that the company publishes any information about its management of asset transactions.						
Evidence						
No evidence found.						



List of Evidence & Sources

N o.	Type (Webpag e or Docume nt)	Name	Downlo ad Date	Link
01	Webpa	Compan	30/09/1	[http://www.csic.com.cn/n4/n17/index.html]
00	ge	y Culture	9 30/09/1	[http://www.ocio.com.or/p0/p55/e7570/pontont.html]
02	Webpa ge	Poverty Alleviatio n Program me	9	[http://www.csic.com.cn/n8/n55/c7578/content.html]
03	Webpa ge	Subsidiar y Compani es	30/09/1	[http://www.csic.com.cn/n11/index.html]
04	Webpa ge	Group Structure	30/09/1 9	[http://www.csic.com.cn/n4/n14/index.html]
05	Webpa ge	About The Compan V	30/09/1 9	[http://www.csic.com.cn/n4/n12/index.html]
06	Webpa ge	On Poverty Alleviatio n Work	30/09/1 9	[http://www.csic.com.cn/n6/n30/c7614/content.html]
07	Webpa ge	Business Review	30/09/1 9	[http://www.csic.com.cn/n7/n37/index.html]
08	Webpa ge	Open Ownersh ip Search	01/10/1 9	[https://register.openownership.org/search?country=CN&q=china+shipbuildin g+industry+corporation]
09	Webpa ge	Corruptio n Risk Assessm ent and Control	08/10/1 9	[http://www.csic.com.cn/n6/n27/c7826/content.html]
10	Webpa ge	Speech on Importan ce of Anti- Corruptio n Work	08/10/1 9	[http://www.csic.com.cn/n6/n29/c7866/content.html]