

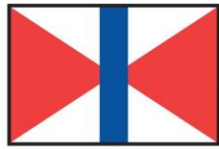
SWIRE SHIPPING

Modern Slavery Policy

Document Number: SD-GLB-POL-0005
Revision: 8
Date: 30 Jan 2023
Policy owner: General Manager, Sustainability and Decarbonisation

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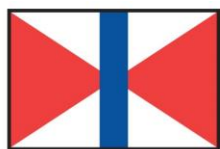
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1. Purpose

Swire Shipping Pte. Ltd. group of companies (SSL) takes our obligations with regard to the elimination of modern slavery, wherever it may be present, very seriously. SSL will not tolerate the practice of modern slavery in any form and is committed to continue to work with all of our stakeholders and relevant regulators to combat this issue, wherever and whenever we may become aware of it.

2. Policy Statement

SSL is committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. We have put in place a number of compliance processes to prevent, detect and eradicate any incidences of modern slavery, as laid out in:

- [UK Modern Slavery Act \(2015\)](#)
- Other relevant laws and regulations

3. Application

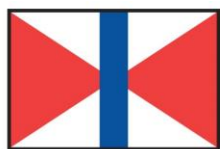
This policy applies to:

- all employees employed working onboard our vessels in any capacity and at all other SSL group workplaces ashore; and to
- all SSL's contractors providing goods or services to support our businesses and operations globally.

4. Definitions

MSA	Modern Slavery Act
Modern Slavery	"Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation." (UK Modern Slavery Act)
Human Trafficking	"Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs." (Palermo protocols, supplementing the Palermo Convention)
Forced Labour	"Any work or services people are forced to do against their will under threat of punishment." (Anti-Slavery International)

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5. Policy Details

5.1 Governance

- The use of our formalised Modern Slavery Act Compliance framework to maintain a Risk-based Assessment process for our material global suppliers. Based on this, we will prioritise assessments for the detection and prevention of forced labour in our supply chains;
- The inclusion of appropriate contractual clauses related to slavery and human trafficking in all our new supplier agreements;
- Conducting internal audits of our compliance with our Modern Slavery Policy and initiatives.
- The review and strengthening of our policies and procedures to ensure they appropriately address modern slavery risks within our operations and our supply chains;
- Maintaining a Whistleblowing channel to report potential non-compliance. Refer to the [Whistleblowing Policy](#).

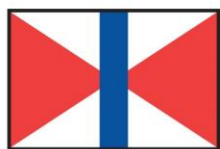
5.2 Training

- The provision of essential modern slavery awareness training for all our employees globally, and for new joiners as part of their induction training;
- Raising the awareness of modern slavery amongst our seagoing and shore-based employees, contract holders and suppliers.

5.3 Assessments

- The carrying out of both self-assessments and site visits for higher risk third-party suppliers and contractors, once every three years, in order to gain an insight into the state of supplier maturity against modern slavery areas and to allow us to propose improvements to strengthen their governance systems. Assessments should be carried out by the relevant managers or a third-party auditor based on the assigned level of risk;
- Continuing to ensure that ethical trading stays at the forefront of how we conduct our business and that human rights and labour standards considerations, including those relating to forced labour, remain fully embedded within our practices.

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5.4 KPIs and Control Measures

- Risk assessments and internal audits undertaken
- Non-Compliance Reports raised as a result of non-compliance with our Modern Slavery Act Compliance framework
- Training undertaken by new and existing employees

6. Governance

6.1 Policy Owner

The policy owner is stated at the beginning of this policy. If the policy owner changes, the policy must be re-issued to document this.

6.2 Failure to Comply

Employees must adhere to the conditions of this policy at all times. Non-compliance must be communicated to the policy owner immediately.

6.3 Exceptions

From time to time instances arise where exceptions to this policy may be required. Any exception requests must be submitted to the policy owner for consideration and approval.

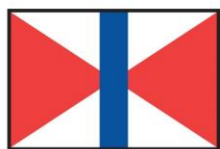
6.4 Changes to Policy

SSL reserves the right to amend this policy at its sole discretion. In case of amendments, the policy owner will inform staff appropriately.

8. Policy History

Amendment Date	Section	Revision Number	Description
30-01-2023		8	Policy owner changed from GM, SD to GM S&D
06-08-2022	Section 2	7	Remove reference to AUS MSA in Section 2 Policy Statement

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Amendment Date	Section	Revision Number	Description
13-01-2022	Section 3 & 5.3	6	Aligning the Modern Slavery Policy to comments from the Mekong Club – an NGO that works to eradicate MS, especially in Asia.
11-10-2021	All sections	5	Company name changed from SS to SSL
08-10-2021	All sections	4	Company name changed from CNCo to SS Revised text in Training section
07-05-2020	2	3	- Changed classification from Internal to Public - Added link to Whistleblowing Policy
26-11-2019		2	

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