

Statement on Modern Slavery and Human Trafficking (2025)

Introduction

This is the tenth annual Modern Slavery Statement published by Swire Shipping Pte. Ltd. (Swire Shipping) and covers the financial year from 1st January 2025 to 31st December 2025. Past statements can be found on the website.

Swire Shipping acknowledges that modern slavery is an increasingly visible global issue and takes its legal and ethical responsibilities seriously. This includes full compliance with the United Kingdom (UK) Modern Slavery Act (MSA) 2015 (as amended), as well as with relevant legislation in all jurisdictions where it operates.

No substantiated incidents of modern slavery were identified through internal reporting channels, audits or due diligence processes across Swire Shipping's operations and supply chain during the 2025 reporting period.

Our Organisational Structure, Business, and Supply Chain

Swire Shipping is a global ship owner and operator, with around 3,000 shore-based and seagoing employees across 22 countries and regions. The Company facilitates trade across over 70 countries. Swire Shipping provides specialist customer solutions for a wide range of cargo and aims to provide a full suite of land and ocean solutions. Services cover:

- High frequency liner shipping services through **Swire Shipping's liner division** for the global transportation of containerised, refrigerated, breakbulk, heavy lift, project, and mini-bulk cargoes;
- Specialist shipping services to the renewable energy, resources, and infrastructure sectors in the project logistics market through **Swire Projects**; and
- **Integrated logistics** services including customs clearance, inland transportation and supply chain management complementing the liner shipping products through door-to-door solutions in the markets the Company serves.

Swire Shipping works with a diverse global network of thousands of suppliers, with the majority located in Australia, New Zealand, Papua New Guinea, Singapore and USA. Its supply chain covers port operations, e.g. services required at port and terminals, related to loading and discharging of cargo, as well as inland transportation services, including container movement. Bunker procurement is outsourced to a third party. Swire Shipping provides technical ship management services ranging from regulatory compliance, repairs, maintenance and crew management to procurement of spares and supplies for the vessels. Swire Shipping is the end user of products and services and does not manufacture any goods or use raw materials.

Swire Shipping's Sustainability team coordinates the modern slavery governance process within the organisation.

Our Policies

Swire Shipping will not tolerate the use of modern slavery in all forms, including but not limited to, forced labour, prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking, either directly by Swire Shipping or by any of its contractors and suppliers. This commitment is embedded in the Company's policies, which can be found at <https://www.swireshipping.com/information/info-pages/about-us/policies/>.

- The **Modern Slavery Policy** sets out the Company's commitment to ensure that there is no modern slavery in its supply chain or in any part of the business. A number of compliance processes to prevent, detect and eradicate any incidences of modern slavery have been put in place.
- The **Human Rights Policy** outlines the Company's commitment to respect the human rights across its operations and value chain. Swire Shipping is committed to comply with all applicable national labour laws and International Labour Organisation (ILO) conventions. Swire Shipping's approach to human

rights is in line with the UN Guiding Principles on Business and Human Rights (informally known as the “Ruggie Principles”) and the “Geneva Declaration on Human Rights at Sea”.

- The **Supplier Code of Conduct** is part of the Corporate Code of Conduct. It contains guidance relating to the Company’s employment practices, as well as clear prohibitions against the use of bonded, child, coerced, forced, indentured or involuntary labour in any form.
- The **Whistleblowing Policy** is in place for both employees and third-parties to report any suspected issues via internal and external reporting channels, including the Confidential Reporting hotline. This can be an entirely confidential process.

Policies and standard operating procedures (SOPs) are reviewed at least annually. All policies and SOPs are accessible by all employees via internal governance systems.

Risk Assessment

A formal risk assessment framework is in place to identify and prioritise critical suppliers. The framework incorporates country risk indicators as identified by the Transparency International’s Corruption Perception Index and Global Slavery Index’s Vulnerability score.

For the purposes of modern slavery risk assessment, Swire Shipping evaluates its exposure to labour-intensive activities and the use of third-party labour providers across its operations and value chain. This assessment informs the identification and categorisation of suppliers to be assessed for potential modern slavery risks. The findings of this process are used to prioritise due diligence and supplier engagement activities, ensuring that resources are focused on areas of highest risk. Through this approach, Swire Shipping has identified key supplier categories with salient human rights and modern slavery risks: manning agencies and ship procurement (chartered-in vessels).

Due Diligence and Remediation

Contractual clauses related to slavery and human trafficking are included in all new service agreements. All suppliers with a contractual agreement are required to follow the Company’s Supplier Code of Conduct. 100% of suppliers are informed of the Supplier Code of Conduct. The whistleblowing and confidential channels allow employees and third-parties to express their concerns, including potential breaches of the Corporate Code of Conduct or policies.

All owned and chartered-in vessels are ILO Maritime Labour Convention 2006 (MLC 2006) compliant. MLC 2006 addresses all 11 of the ILO indicators of forced labour. Swire Shipping completes the annual RightShip Crew Welfare self-assessment questionnaire and has the RightShip badge. The questionnaire is based on international human rights standards and surpasses the ILO MLC 2006, covering the full spectrum of seafarers’ rights, from fair employment terms and crew protection to effective grievance mechanisms.

Swire Shipping subscribes to an Employee Assistance Programme provided by Intellect for shore-based employees and to the International Seafarers’ Welfare and Assistance Network (ISWAN) for seafarers. Both services are confidential in nature and offered at no cost to employees and their immediate family members.

Where potential or actual cases of modern slavery are identified, Swire Shipping is committed to taking appropriate remedial action, which may include working with suppliers to implement corrective action plans, enhancing monitoring, or terminating relationships where remediation is not possible.

Manning Agencies

Swire Shipping uses several manning agencies in various countries and regions around the world. All manning agencies must be MLC 2006 certified and are strictly prohibited to charge recruitment fees or impose any form of debt bondage. These are confirmed during the annual audits conducted by Swire Shipping. The audits include a review of recruitment and employment practices compliance with applicable MLC 2006 requirements, and controls established to prevent modern slavery, forced labour, human trafficking, and other unethical recruitment practices, such as physical and sexual violence, withholding of wages, retention of

identity documents, and restriction of movement. Any non-compliances identified are escalated immediately, investigated without delay, and corrective actions are implemented as a matter of priority.

Based on the audit findings and supporting documentation reviewed, no indicators, incidences, or concerns relating to modern slavery, forced labour, or human trafficking were identified. Accordingly, no corrective action plans relating to modern slavery were required to be implemented during the reporting period.

Ship Procurement (Chartered-in vessels)

In addition to being MLC 2006 certified, Swire Shipping endeavours to only select vessels that are registered under flag states under the Paris MOU's Whitelist and that obtain a RightShip Safety score of three and above. The assessment for scoring covers, *inter alia*, appropriate minimum safety standards, and human rights criteria including living and working standards, protection of seafarers' rights and conditions of employment.

Swire Shipping launched its assessment of chartered-in vessels for indicators of forced labour through a voluntary self-assessment questionnaire. The questionnaire is available online in English, Chinese and Tagalog. Questionnaires were distributed to 15 chartered-in vessels in 2025, with responses received from 12 vessels (80% response rate). No major issues were found.

Training and Awareness Building

Target/KPI	2025 progress
100% of shore-based employees must undertake modern slavery training (based on the UK Act) annually.	100% of employees completed this training via the internal online portal in 2025.
Deliver training on modern slavery awareness to senior officers attending Safety Awareness Courses.	63 Swire Shipping senior officers attended the Safety Awareness Courses in 2025.
Raise awareness of modern slavery with key critical suppliers.	5 suppliers undergone the modern slavery training module in 2025.

Assessing Effectiveness and Consultation

Swire Shipping's Sustainability team works with various stakeholders within the Company and at the Group level to embed robust governance structures in Company's operations. In order to ensure the ability to identify and respond to modern slavery risk in relation to seagoing employees, Swire Shipping engages in regular dialogue with the manning agencies.

Swire Shipping assesses the effectiveness of its modern slavery risk management measures through a range of indicators, including:

- Supplier engagement and questionnaire response rates.
- Number of reported concerns through whistleblowing channels and their resolution.
- Completion rates of training across shore-based employees and number of senior officers trained.

These indicators are reviewed annually.

This statement has been approved on behalf of Swire Shipping's Board of Directors by

Jeremy Sutton

Chief Executive Officer

26 June 2026