



Modern Slavery Policy

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Revision: 2
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1. Purpose

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

2. Policy Statement

Swire Bulk is committed to ensure 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 \(2015\)](#)
- [Australia Modern Slavery Act \(2018\)](#)
- Other relevant laws and regulations

3. Application

This policy applies to:

- all employees employed working on board our vessels in any capacity and at all other Swire Bulk group work places ashore; and to
- all Swire Bulk's contractors providing goods or services to support our businesses and operations globally

4. Definitions

MSA Modern Slavery Act

5. Policy Details

5.1 Governance

- The use of its 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 chain;

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- 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 chain;
- Maintaining a Whistleblowing channel to report potential non-compliance. Refer to the Swire Bulk [Whistleblowing Policy](#).

5.2 Training

- The provision of core training to our management teams most likely to encounter potential issues with regard to modern slavery, and for new joiners as part of their induction training that are relevant and appropriate to their roles and responsibilities and in line with best international practices;
- Raising the awareness of modern slavery amongst our sea and shore employees, and contract holders.

5.3 Assessments

- The carrying out of both self-assessments and site visits for higher risk third party suppliers and contractors in order to gain an insight into the state of supplier maturity against modern slavery areas and allowed us to propose improvements to strengthen their governance systems;
- 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.

5.4 KPI's 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

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- 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

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

7. Related Documents

Level2	Level3a	Level3b	Level4
<ul style="list-style-type: none">• Whistleblowing Policy			

8. Policy History

Amendment Date	Section	Revision Number	Description
26-04-2021		2	Approved by email by Simon Bennett (GM-SD)

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