

# Human Rights Policy

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Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   1 of 7
<i>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</i>		

1. Purpose .....	3
2. Policy Statement .....	3
3. Application .....	3
4. Definitions .....	3
5. Policy Details .....	3
5.1 Respect for Human Rights.....	3
5.2 Community and Stakeholder Engagement.....	4
5.3 Valuing Diversity .....	4
5.4 Forced Labour and Human Trafficking.....	5
5.5 Child Labour .....	5
5.6 Employment, Work Hours, Wages and Benefits .....	5
5.7 Workplace Security.....	6
5.8 Freedom of Association and Collective Bargaining .....	6
5.9 Grievances .....	6
5.10 Monitoring and Evaluation .....	6
6. Governance .....	6
6.1 Policy Owner .....	6
6.2 Failure to Comply .....	6
6.3 Exceptions.....	7
6.4 Changes to Policy.....	7
7. Related Documents.....	7
8. Policy History .....	7

Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   2 of 7
<b>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</b>		

## 1. Purpose

Respecting human rights is a fundamental part of Swire Bulk Holdings Pte. Ltd. group of companies' (Swire Bulk) efforts to operate our business sustainably. Swire Bulk is committed to being an industry leader; innovating and improving standards in line with our reputation for having the best operating practices in the industry. There is both a business and a moral case for ensuring that human rights are upheld across our operations and our value chain.

This policy is informed by the [International Bill of Human Rights](#) and the [International Labour Organisation's \(ILO\) Declaration of Fundamental Principles and Rights at Work](#) (often referred to as the ILO Core Convention).

## 2. Policy Statement

Swire Bulk is strongly committed to ensuring we conduct our business in a manner which respects the human rights and dignity of our employees, those employed in our supply chains and the communities in which we operate.

This policy is supported by the following other Swire Bulk policies:

- Diversity and Inclusion Policy
- Grievance and Dispute Settlement Policy
- Modern Slavery Policy
- Respect in the Workplace Policy
- Supplier Code of Conduct
- Whistleblowing Policy

## 3. Application

This policy applies to all employees and contractors employed or working on board Swire Bulk vessels and in our offices ashore. We will also work with our suppliers to ensure that they observe and comply with the principles and contents of this policy.

## 4. Definitions

Acronyms	Description
Swire Bulk or The Company	Swire Bulk Holdings Pte. Ltd. and its subsidiaries and branches

## 5. Policy Details

### 5.1 Respect for Human Rights

We recognise that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts. We will work to identify, prevent and mitigate any adverse human rights impacts resulting from or caused by our business activities. Our approach to Human Rights is line with the [UN Guiding Principles on Business and Human](#)

Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   3 of 7
<i>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</i>		



[Rights](#) (informally known as the "Ruggie Principles"), and the recognition that while states have a duty to protect human rights, companies have a responsibility to respect the same.

We comply with national laws where they conflict with human rights standards but still do our best to respect the latter.

Due to the nature of our business being service orientated we will achieve the most by generally focusing our efforts on human rights issues related to labour conditions.

In particular, we support the work currently being undertaken to develop the soft-law "[Geneva Declaration on Human Rights at Sea](#)", the concept of which rests on the following four fundamental principles:

1. All human rights apply at sea to exactly the same degree and extent that they do on land.
2. All persons at sea, without any distinction, enjoy human rights at sea.
3. There are no maritime specific rules allowing derogation from human rights standards.
4. All human rights established under treaty and customary international law must be respected at sea.

We will review all areas of our existing business operations, and particularly when entering new business and/or geographical areas, through a risk-based Human Rights Impact Assessment (HRIA). Where this HRIA raises concerns they will be escalated for review at a subsequent internal Corporate Governance & Compliance Meeting. For details of this process refer to the Human Rights Impact Assessment (HRIA) SOP.

Our Supplier Code of Conduct sets out our expectations with regards to the respect for the human rights, including labour rights, of the workers in our supply value chain.

We will ensure that both ourselves and ourselves suppliers are independently audited to ensure their compliance with our aims, and help them raise their standards.

## 5.2 Community and Stakeholder Engagement

We are committed to engaging with our stakeholders in the communities in which we operate to ensure that we are responsive to their reasonable and relevant views on how we conduct our business. Where appropriate, we will engage in dialogue with these stakeholders on Human Rights issues related to our business operations. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

## 5.3 Valuing Diversity

We aim to create an inclusive and supportive working environment for all our people regardless of their age, gender, gender identity, sexual orientation, relationships, family status, disability, race, ethnicity, nationality or religious or political beliefs. We base employment decisions on merit, considering qualifications, skills and achievement, and work to eliminate discriminatory bias in all its forms. See our Diversity and Inclusion Policy.

Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   4 of 7
<i>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</i>		



We do not tolerate discrimination or harassment based on the foregoing matters. We believe in creating an environment where people feel comfortable at work and able to realise their full potential. See our Respect in the Workplace Policy.

We recognise that all businesses and their employees benefit from both the diversity present and inclusion demonstrated by their workforces. We have in place a Diversity and Inclusion Policy to address any areas of concern in this area.

## 5.4 Forced Labour and Human Trafficking

We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking, either directly by Swire Bulk or by any of our contractors and suppliers. This will be assured through regular and independent remote and on-site auditing (as determined through objective risk assessments) of Swire Bulk and our contractors and suppliers.

## 5.5 Child Labour

We will ensure through regular and independent remote and on-site auditing that Swire Bulk, or our contractors and suppliers, will not:

- employ any person under the local legal minimum employment age, or
- employ any person in a manner which conflicts with completion of their compulsory schooling, and
- in any case employ any person below the age of 16 years on a full-time basis (unless part of a recognised professional / workplace apprenticeship programme, see below).

We require that our, and our suppliers', professional / workplace internship / apprenticeship programmes are legitimate and that they comply with all laws and regulations governing child labour and their safety for all internship / apprenticeship programmes. This explicitly includes the requirements of Minimum Age Convention, 1973 (No. 138) and Worst Forms of Child Labour Convention, 1999 (No. 182) irrespective of whether they have been ratified by the local country of operation.

## 5.6 Employment, Work Hours, Wages and Benefits

We will recruit the best people, compensate employees competitively in accordance with the industry and local labour market rates, and provide training to enable our employees to realise their full potential. We will operate in full compliance with all laws applicable to wages, work hours, overtime and all relevant benefits, and demand this of our contractors and suppliers also.

Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   5 of 7
<b>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</b>		

## 5.7 Workplace Security

We will maintain a workplace that is free from actual or threatened physical, sexual, psychological or verbal harassment, punishment or abuse, intimidation as a means of enforcing discipline or control the workplace, and other unsafe or disruptive conditions due to internal and external threats. We demand this of our contractors and suppliers also.

Proactive security safeguards are provided and reactive whistleblowing channels are established for employees and will be maintained with respect for employee privacy and dignity. See our Whistleblowing Policy.

We will conduct our operations in a manner that safeguards the health and safety our employees, contractors, suppliers, customers and visitors to our business premises and the communities in which we operate. We are committed to a target of causing zero harm to all our personnel. See our Swire Bulk Operations Policy.

## 5.8 Freedom of Association and Collective Bargaining

We respect our employees' right to either join, form, or not join, a labour union in accordance with local law without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we will establish a constructive dialogue with the union's representatives. We are committed to collective bargaining in good faith with such representatives.

We comply with applicable laws and regulations relating to freedom of association.

## 5.9 Grievances

We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. See our Grievance and Dispute Settlement Policy.

## 5.10 Monitoring and Evaluation

We will assess the effectiveness of this Human Rights policy through a formal ongoing monitoring and evaluation of our internal processes and procedures at least annually and will amend this Policy as and if required.

## 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

Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   6 of 7
<i>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</i>		

Employees must always adhere to the conditions of this policy. Non-compliance must be escalated to hiring manager immediately.

### 6.3 Exceptions

There might be scenarios 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

Policies	SOPs	Guidelines and Manual
<ul style="list-style-type: none"> <li>• Supplier Code of Conduct</li> <li>• Diversity and Inclusion Policy</li> <li>• Modern Slavery Policy</li> <li>• Whistleblowing Policy</li> <li>• Grievance and Dispute Settlement Policy</li> <li>• Respect in the Workplace Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Human Rights Impact Assessment (HRIA) SOP</li> </ul>	

## 8. Policy History

Amendment Date	Section	Revision Number	Description
26-04-21		2	- Approved by Simon Bennett (GM-SD) by email
23-08-22	Section 2	3	<ul style="list-style-type: none"> <li>- Incorporate SPAC's HuR policies</li> <li>- Alphabetise supporting policies in Section 2 Policy Statement</li> <li>- Remove references to People policy in Section 2 and 5.3</li> </ul>

Document Number	<b>SD-GLB-POL-0009</b>	
Classification	PUBLIC	Page   7 of 7
<i>Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.</i>		