

Modern Slavery Policy

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1. Purpose

Swire Bulk Holdings Pte. Ltd. group of companies (Swire Bulk) takes our 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 our stakeholders and relevant regulators to combat this issue, wherever and whenever we 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 \(2015\)](#)
- Other relevant laws and regulations

3. Application

This policy applies to:

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

4. Definitions

Acronyms	Description
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

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	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)

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 chain;
- 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 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 shore-based employees, seafarers, 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 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
- 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 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
• Whistleblowing Policy		

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8. Policy History

Amendment Date	Section	Revision Number	Description
26-04-21		2	- Approved by Simon Bennett (GM-SD) by email
20-01-22	Section 4, 5.1, 5.2, 5.3	3	- Amended to include recommendations by Mekong Club. - Note: Document approved outside of the CGS by Simon Bennett
23-08-22	Section 2	4	- Remove reference to AUS MSA in Section 2 Policy Statement

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