



# Responsible Cargo Carriage Policy

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**Revision:** 3  
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## 1. Purpose

As a socially and environmentally responsible company, Swire Bulk Holdings Pte Ltd and/or our group companies and/or subsidiaries is committed to taking a more sustainable development path for ourselves and future generations.

## 2. Policy Statement

Swire Bulk recognises the importance of conserving, and where possible enhancing, species diversity and that we have a responsibility not to facilitate trade in any flora or fauna or their produce that may threaten the sustainability of any species.

## 3. Application

This policy applies to all employees and contractors employed or working onboard vessels, in any capacity, and at all other Swire Bulk group work places ashore.

## 4. Definitions

Swire Bulk	Swire Bulk Holdings Pte Ltd and its subsidiaries and branches
CITES Convention	The Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973)
CBD Convention	The Convention of Biological Diversity (1992)
MSC	Marine Stewardship Council
SFM	Sustainable Forest Management
UNODA	United Nations Office on Disarmament Affairs

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## 5. Policy Details

### 5.1 Compliance to Regulatory Requirements

We will comply at all times with relevant international and national regulatory requirements.

### 5.2 Relevant International Legislative Instruments

In respect of the carriage of flora and fauna cargo, the relevant international legislative instruments are primarily [“The Convention on International Trade in Endangered Species of Wild Fauna and Flora”](#) (the ‘CITES’ Convention), (1973) as amended in Bonn and Gaborone, together with [“The Convention on Biological Diversity”](#) (the ‘CBD’ Convention) (1992), and including the Cartagena Protocol on Biosafety (2000) to the CBD Convention. In seeking to act responsibly, Swire Bulk has determined that we will only carry flora and fauna cargo in full compliance with the CITES and CBD Conventions and their Annexes, Amendments and Protocols

Additionally, we will seek to support the outcomes of the current development of an international legally-binding instrument under the United Nations Convention on the Law of the Sea on the conservation and sustainable use of marine biological diversity of Areas Beyond National Jurisdiction.

Further, we seek to abide by the recommendations by the World Wildlife Fund’s (WWF’s) Red Flag Indicators for Wildlife and Timber Trafficking in Containerised Sea Cargo.

### 5.3 Transportation of illegal wildlife products

Swire Bulk supports the “United for Wildlife” International Taskforce on the transportation of illegal wildlife products, recognising the devastating impact of illegal wildlife trade, and will not knowingly facilitate or tolerate the carriage of illegal wildlife products, or game or hunting trophies (including legally hunted or legally acquired trophies).

Further, Swire Bulk will notify relevant law enforcement authorities of cargoes suspected of containing illegal wildlife and their products. We will also support the development of mechanisms by the World Customs Organisation and national customs authorities to aid the detection and prevention of trade in illegal wildlife and their products.

Wildlife traffickers regularly use companies legally owned by and registered to a third party but beneficially controlled by wildlife trafficking networks or their facilitators. These ‘front’ companies provide wildlife traffickers with a means to obscure the true beneficiaries of illicit shipments of wildlife, reduce risk of detection, and enable greater operational flexibility.

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We will thus do the due diligence on the companies to the extent that is operationally possible, and if in doubt, will not accept the shipment.

In particular, we will closely scrutinise:

- Companies owned by or registered to individuals with no previous international trading background.
- Shipments in which the declared counterparty is newly registered or has no apparent background in or knowledge of relevant lines of business.
- Shipments in which relevant counterparty and payment details are illogical or anomalous.
- Companies with apparent connections to known wildlife trafficking suspects.

## 5.4 Prohibited Cargo

Additionally, we will not carry:

- any live animals where the treatment of the animals at the origin or destination, or the fact of the carriage itself, is not in accordance with international best practice.
- any live wild animals unless they are transported within the scope of a recognised wildlife conservation/preservation program or consigned to a zoological garden, a national park/reserve, a government wildlife agency or an approved animals care centre.
- any live carry animals destined to be used for laboratory research.

## 5.5 Sustainable Food

We will not knowingly accept shipments of unsustainably caught seafood, as detailed in the Sustainably Produced Food Policy and/or seafood from illegal, unregulated, or unreported (IUU) fisheries or shipments of any cetacean, whale or shark products. We will engage with stakeholders with the ultimate goal of only accepting seafood shipments that are certified by the [Marine Stewardship Council](#) ('MSC') or the [Aquaculture Stewardship Council](#) (ASC).

## 5.6 Importance of Forests

We recognise the importance of forests in reducing the effects of man-induced Global Warming and support [Sustainable Forest Management \(SFM\)](#). Accordingly, Swire Bulk will only carry forest products, (and the machinery to support the management of such forests) that have been independently certified under the following (or equivalent) certification programmes:

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[Programme for the Endorsement of Forest Certification](#) ('PEFC')

and/or

[Forest Stewardship Council](#) ('FSC')

and/or

Any national forestry certification schemes (e.g. China Forest Certification Scheme ('CFCS') or 'SVLK' in Indonesia)

## 5.7 Carriage of waste materials

We will not carry waste materials of any type across international borders unless the carriage, including documentation, is fully compliant with "[The Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and Their Disposal](#)" (1989), (the "Basel Convention") and "[The Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter](#)", (the "London Convention") (1972).

## 5.8 Carriage of arms, munitions and military equipment

We will not carry arms, munitions and military equipment from, via, to or on behalf of any UN Member State or States where the international transfer of armaments is not reported to the "[United Nations Register of Conventional Arms](#)", maintained by the United Nations Office on Disarmament Affairs ("UNODA"). For clarity, this provision does not include the international movement of military equipment solely to facilitate training purposes.

## 5.9 Carriage of ivory

We will not carry ivory of any kind, raw or worked.

## 5.10 Policy review to keep abreast of on-going research

We will base our cargo acceptance policy on the above principles and in so doing take account of current external, science and research-based input and good international practice. We understand that research will be on-going and the determination of good practice is a dynamic process and hence this policy will evolve over time.

## 5.11 Engagement with customers and agencies

We recognise that any policy is only as good as it is practicable and enforceable and we will engage with our customers and agencies to ensure that this policy is understood and supported.

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## 5.12 Working with industry bodies and NGOs

We support an industry approach to global issues of enhancing species sustainability and live animal carriage and will work with industry bodies and NGOs to encourage a practical and responsible approach to promote sustainability.

## 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 the case of amendments, the policy owner will inform staff appropriately.

## 7. Related Documents

Level2	Level3a	Level3b	Level4
			<ul style="list-style-type: none"> <li>Swire Group Green Guidelines</li> <li>World Wildlife Fund's (WWF's) Red Flag Indicators for Wildlife and Tim</li> </ul>

## 8. Policy History

Amendment Date	Section	Revision Number	Description
20-01-2022	Section 5.2	3	Added reference to

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Amendment Date	Section	Revision Number	Description
			WWF's Wildlife Trafficking Red Flag as L4 document Note: Document approved outside of the CGS by Simon Bennett
26-04-2021		2	This document has been approved by email by Simon Bennett (GM-SD)

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