

Sustainably Produced Food Policy

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1. Purpose

Swire Bulk Holdings Pte. Ltd. group of companies (Swire Bulk) shall ensure that we support or encourage the production or supply or consumption of sustainably produced food items to support the sustainable use of natural resources, avoid contributing to climate change and protect biodiversity.

Over-catching is endangering some marine species and the ecosystems. Our choice of opting out of unsustainable produced food items and proactively asking for information about the source of the food items could create momentum for effective change in the industry at large.

This also demonstrates our leadership in being a good steward of the natural resources and biodiversity under our influence as specified in our Sustainable Development Policy.

2. Policy Statement

Swire Bulk will ensure that all food prepared and/or purchased for consumption at a Swire Bulk worksite and/or by Swire Bulk employees at a Swire Bulk or third-party worksite, which includes company functions, are as sustainably produced as reasonably possible.

Swire Bulk will keep a record of any instances where we are unable to adhere to this Policy, including reasons why and details of food procured or consumed.

3. Application

This policy applies to all employees employed or working on board vessels, in any capacity, and at all other Swire Bulk workplaces ashore.

4. Definitions

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

5. Policy Details

5.1 Unsustainably Produced Food Items

These include the following but are not limited to:

- Abalone (South Africa, wild caught)
- Bluefin tuna (Global, wild caught)
- Humphead Wrasse (South East Asia, wild caught)
- Shark Fin (Global, wild caught)
- Snake (Global, wild caught)

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- Sturgeon / paddlefish caviar (Global, wild caught)
- Soft and hard-shelled turtle / tortoise (Global, wild caught)
- Fat Choy (or black moss in English) ([See link for more information about Fat Choy](#))

The person responsible for ensuring compliance with this policy, including explaining to relevant employees and external parties the reason for its implementation is the General Manager – Sustainable Development.

The person responsible for contracting for the supply of food for consumption at any Swire group worksite, and / or by Swire Bulk employees at a Swire Bulk or third-party worksite, maybe in HR other departments.

That person shall ensure that:

- preference is given to low-carbon options (for example by reference to seasonality, point of production and being plant-based) when designing and creating menus and promote these options to our customers and employees;
- unsustainably produced food items listed under the ‘avoid’ category of the [Marine Conservation UK’s Good Fish Guide](#) (or locally relevant [WWF Seafood Guide](#) where relevant) and those species listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora) are not ordered or served in the company canteens, cafeterias, company events, or ships’ mess-rooms, and are explicitly excluded from the recipes of new catering contracts;
- when purchasing fish and seafood, only purchase seafood* that is certified as ‘sustainable’ by the Marine Stewardship Council (MSC) or Aquaculture Stewardship Council (ASC), and other food products that are sustainably certified by international, regional or national organisations (for example, Rainforest Alliance, Sustainable Agriculture Network, and The Soil Association);
- there is to be no attendance on company business at any third-party locations such as restaurants or conference / offsite catering that serve any of the unsustainably produced food items listed herein, (e.g. shark’s fin soup) even if this is advised to be not on the actual set menu, as this merely encourages the third-party establishment to continue to serve such food;
- the use of single-use items are avoided, as far as practicable, however, if not possible, ensure that these items are recyclable, ideally composed of a high percentage of recycled materials, and provide facilities to collect after use for recycling;
- there is left-over food waste minimisation and separate waste generated from production and processing for composting or recovery of energy wherever possible;
- no expense claim will be processed or approved for entertaining where unsustainably produced food (e.g. shark’s fin soup) has been consumed.

*Seafood – specifically but not limited to prawns/shrimps and Chilean seabass/Patagonian toothfish

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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
<ul style="list-style-type: none"> Sustainable Development Policy 		

8. Policy History

Amendment Date	Section	Revision Number	Description
26-04-21		2	- Approved by Simon Bennett (GM-SD) by email
19-05-21	Section 5.1	3	- Fat Choy (black moss) added to list of unsustainably produced food items - Document approved outside of the CGS by Simon Bennett
23-08-22	Section 1, 2 and 5	4	- Incorporate JS&S policies

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