

Responsible Cargo Carriage Policy

Document Number: SD-GLB-POL-0002
Revision: 4
Date: 02 Oct 2023
Policy owner: General Manager, Sustainability and Decarbonisation

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 1 of 9
<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.....	4
5.1 Compliance to Regulatory Requirements.....	4
5.1.1 Flora and Fauna	4
5.1.2 Illegal wildlife* products.....	4
5.1.3 Prohibited Cargo	5
5.1.4 Unsustainable Food	5
5.1.5 Importance of Forest Products and Machinery.....	5
5.1.6 Waste materials	6
5.1.7 Arms, munitions and military equipment.....	6
5.1.8 Ivory.....	6
5.1.9 Products produced by forced labour	6
5.2 Policy review to keep abreast of ongoing research	7
5.3 Engagement with customers and agencies	7
5.4 Working with law enforcement industry bodies and NGOs.....	7
6. Governance	7
6.1 Policy Owner	7
6.2 Failure to Comply	8
6.3 Exceptions	8
6.4 Changes to Policy	8
7. Related Documents.....	8
8. Policy History.....	8

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 2 of 9
Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.		

1. Purpose

As a socially and environmentally responsible company, Swire Bulk Holdings Pte. Ltd. and its subsidiaries and branches, collectively known as Swire Bulk is committed to taking a more sustainable 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.

This policy has been developed with the recommendations by World Wildlife Fund (WWF) Singapore and TRAFFIC.

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

Acronyms	Description
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
WWF	World Wildlife Fund is an international non-governmental organisation founded in 1961 that works in the field of wilderness preservation and the reduction of human impact on the environment.
TRAFFIC	A non-governmental organisation that was established in 1976 by WWF and International Union for Conservation of Nature (IUCN) as a wildlife trade monitoring network to undertake data collection, analysis, and provision of recommendations to inform decision making on wildlife trade.

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 3 of 9
<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>		

5. Policy Details

5.1 Compliance to Regulatory Requirements

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

We will monitor and do the due diligence to the extent possible for the following cargoes:

5.1.1 Flora and Fauna

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.

5.1.2 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.

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.

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.

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 4 of 9
<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>		



- Shipments in which relevant counterparty and payment details are illogical or anomalous.
- Companies with apparent connections to known wildlife trafficking suspects.

Swire Bulk will utilise the IMO’s Guidelines for the Prevention and Suppression of the Smuggling of Wildlife on Ships Engaged in International Maritime Traffic and the World Wildlife Fund’s (WWF’s) Red Flag Indicators for Wildlife and Timber Trafficking in Containerised Sea Cargo, a comprehensive guidance document on at-risk routes as well as typical indicators of illicit activities such as questionable paperwork and discrepancies in information like value, weight, and appearance. Irregular behaviour, such as consignments split across multiple shipments, last-minute requests for shipment clearance and abnormal or sudden changes in routes or destinations may be signs of illegal action.

**as defined in the [CITES Convention Appendices I, II and III](#). Appendix I lists species threatened with extinction. Appendix II lists species not necessarily threated with extinction but may become so unless trade is regulated and their specimens are conserved. Appendix III lists species subject to regulation within the jurisdiction of a Party and for which the cooperation of other Parties is needed to control international trade.*

5.1.3 Prohibited Cargo

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 programme 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.

5.1.4 Unsustainable 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, shark and ray 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).

We will also utilise the [WWF Seafood Guide](#), [Marine Conservation UK’s Good Fish Guide](#) (or locally relevant [WWF Seafood Guides](#) where relevant) in identifying high-risk species being transported by Swire Bulk.

5.1.5 Importance of Forest Products and Machinery

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:

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 5 of 9
<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>		



[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'), 'SVLK' in Indonesia or [Responsible Wood Certification in Australia and New Zealand](#)).

5.1.6 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");
- ["The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade"](#) (1998), (the "Rotterdam Convention");
- ["The Stockholm Convention on Persistent Organic Pollutions \(POPs\)"](#) (2001), (the "Stockholm Convention"); and
- ["The Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter"](#), (the "London Convention") (1972).

5.1.7 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.

Country reports can be accessed through the [UN Register of Conventional Arms \(UNROCA\) website](#). UNROCA requests countries to report on their exports and imports of arms transfers.

5.1.8 Ivory

We will not engage in the commercial, often illegal, trade or or transportation of any kind (raw or worked) of ivory tusks of the hippopotamus, walrus, narwhal, mammoth, and most commonly, African and Asian elephants.

5.1.9 Products produced by forced labour

We will not knowingly carry cargo that is produced by children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 6 of 9
<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>		

exploitation (modern slaves). We will observe the requirements of the following legislations related to the cargo (to the extent possible):

- [US California Transparency in Supply Chains Act \(2012\)](#)
- [US Trade Facilitation and Trade Enforcement Act \(2015\)](#)
- [UK Modern Slavery Act \(2015\)](#)
- [US Uyghur Forced Labor Prevention Act \(2021\)](#)

5.2 Policy review to keep abreast of ongoing 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 ongoing and the determination of good practice is a dynamic process and hence this policy will evolve over time.

5.3 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.

5.4 Working with law enforcement industry bodies and NGOs

We will work with relevant law enforcement offices where required to enforce this policy.

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.

Key Stakeholders Approval		
Role	Signed off By (Name)	Date signed off
General Manager, Sustainability and Decarbonisation	Susana Germino	02 Oct 2023

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 7 of 9
<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>		

6.2 Failure to Comply

Employees must always adhere to the conditions of this policy. Non-compliance must be escalated to policy owner 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	SOP	Guidelines and Manuals
		<ul style="list-style-type: none"> World Wildlife Fund's (WWF's) Red Flag Indicators for Wildlife and Timber

8. Policy History

Amendment Date	Section	Revision Number	Description
02-10-2023	All	4	Incorporate recommendations from WWF and TRAFFIC. Revise sections and subsections of the policy. Add relevant forced labour Acts and regulations. Delete link to Swire Group Green Guidelines
20-01-2022	Section 5.2	3	Added reference to WWF's Wildlife Trafficking Red Flag as L4 document Note: Document approved outside of the CGS by Simon Bennett

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 8 of 9
<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>		

26-04-2021		2	This document has been approved by email by Simon Bennett (GM-SD)
------------	--	---	---

Document Number	SD-GLB-POL-0002	
Classification	PUBLIC	Page 9 of 9
Note: By reading this manual you are deemed to have accepted and agreed to comply with the notice stated on the front page.		