



## **Statement on Modern Slavery and Human Trafficking (2024)**

### **Introduction**

This is the third annual Modern Slavery Statement published by Swire Bulk Pte. Ltd. (Swire Bulk) and covers the financial year from 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024. Past statements can be found on the website.

Swire Bulk acknowledges that modern slavery is an increasingly visible global issue and takes its legal and ethical responsibilities seriously. This includes full compliance with the United Kingdom (UK) Modern Slavery Act (MSA) 2015 (as amended), as well as with relevant legislation in all jurisdictions in which it operates.

With a strong heritage and ethical foundation in fair employment practices, Swire Bulk is committed to upholding international standards by providing safe, healthy, and supportive working conditions that promote the wellbeing of all employees.

Swire Bulk will not tolerate the practice of modern slavery in any form and is committed to working with all stakeholders and relevant regulators to combat this issue, wherever and whenever the Company may become aware of it.

**There have been no incidences of modern slavery reported within Swire Bulk's operations, or in its supply chain, globally within the calendar year 2024.**

### **Our Organisational Structure, Business and Supply Chain**

Swire Bulk Pte. Ltd., headquartered in Singapore, operates under the brand name of 'Swire Bulk'. It is a wholly-owned subsidiary of Swire Bulk Holdings Pte. Ltd., a vessel-owning company. Swire Bulk Holdings Pte. Ltd. is, in turn, a wholly-owned subsidiary of Swire Marine Holdings Pte. Ltd., an investment holding company incorporated in Singapore. Swire Marine Holdings Pte. Ltd. is a wholly-owned subsidiary of The China Navigation Company Limited, an investment holding company registered in London. None of these companies are publicly quoted on any stock exchange, and are ultimately owned by John Swire & Sons Ltd., based in London.

Swire Bulk, the specialist bulk trading arm of the multinational Swire Group, is a leading vessel owner and operator in the dry bulk geared sector. With a trading fleet of around 125 Handysize and Supramax/Ultramax vessels Swire Bulk operates through six commercial offices worldwide. Its global headquarters is located in Singapore.

Swire Bulk provides commercial services, voyage operation services, and supervision of third-party ship managers. Bunker procurement is outsourced to a third party. Vessel technical management is outsourced to third-party ship management companies that provide technical management services ranging from regulatory compliance, repairs, maintenance and crew management to procurement of spares and supplies for the vessels.

Swire Bulk is the end user of products and services and does not manufacture any goods or use raw materials.

### **Governance**

Swire Bulk's Sustainability team (part of the Sustainability and Decarbonisation Department) coordinates the modern slavery governance process within the organisation. One of the goals under the Sustainability Strategy (SwireBulkTHRIVE) is to ensure that Swire Bulk champions labour rights and enforces MSA requirements, with

the corresponding KPI of “Number of cases reported, investigated and addressed during the calendar year”. Results are published in the annual Sustainability Reports and MSA statements.

## Our Policies and Procedures

Swire Bulk has the governance structures in place, together with policies and procedures, to ensure that the Company is a market leader in terms of safety and quality of operations, as well as meeting its zero-tolerance commitment on modern slavery in line with the UK MSA and relevant global jurisdictions.

Links to the policies that are guide Swire Bulk’s business activities and stakeholder relationships can be found at <https://swirebulk.com/about-us/policies/>.

- The **Modern Slavery Policy** sets out the Company’s commitment to ensure that there is no modern slavery in its supply chain or in any part of the business. A number of compliance processes to prevent, detect and eradicate any incidences of modern slavery have been put in place.
- The **Human Rights Policy** outlines the Company’s commitment to respect the human rights across its operations and value chain. Swire Bulk is committed to comply with all applicable national labour laws and International Labour Organisation (ILO) conventions. Swire Bulk’s approach to human rights is in line with the UN Guiding Principles on Business and Human Rights (informally known as the “Ruggie Principles”) and the “Geneva Declaration on Human Rights at Sea”.
- The **Supplier Code of Conduct**, updated in October 2024, is part of the Corporate Code of Conduct. It contains guidance relating to the Company’s employment practices, as well as clear prohibitions against the use of bonded, child, coerced, forced, indentured or involuntary labour in any form. All suppliers with a contractual agreement are required to follow the Company’s Supplier Code of Conduct. 100% of suppliers are informed of the Supplier CoC.
- The **Whistleblowing Policy** is in place for both employees and third-parties to report any suspected issues. This can be an entirely confidential process.

## Contractual Obligations

Contractual clauses related to slavery and human trafficking are included in all new service agreements. Swire Bulk is working towards including the same clauses in chartering agreements (where possible) and in existing contractual agreements.

## Protecting Human Rights of Seafarers

Swire Bulk fully supports and complies with and/or exceeds the standards as set forth in the ILO Maritime Labour Convention 2006 (MLC 2006). MLC 2006 encompasses all relevant standards of existing ILO maritime labour conventions and recommendations, as well as fundamental principles contained in core International Labour Conventions and the ILO 1998 Declaration on Fundamental Principles and Rights at Work.

Swire Bulk works with its third-party ship managers to ensure that all contractual conditions for seafarers are in full compliance with MLC 2006 requirements and wage standards are on par or above international or national Trade Union’s Collective Bargaining Agreement such as the International Transport Federation’s or Singapore Maritime Officer’s Union and Singapore Organisation for Seafarers. All manning agencies engaged by the third-party ship managers are strictly prohibited to charge recruitment fees or impose any form of debt bondage. This requirement is included as part of the manning agencies audit process. In addition to the above, manning agencies are required to have policies and procedures to prevent any forms of forced labour including but not limited to physical and sexual violence, withholding of wages, retention of identity documents, and restriction of movement.

The RightShip Crew Welfare self-assessment questionnaire highlights a strong commitment to crew welfare, ensuring that seafarers are provided with fair employment terms, safe working conditions, access to social protection and appropriate management of grievance mechanisms. These aspects are crucial for fostering a sustainable and responsible maritime industry. Demonstrating their dedication, Swire Bulk's third-party managers successfully completed the annual Crew Welfare self-assessments and earned the RightShip badge.

In 2024, Swire Bulk became a partner of Rio Tinto Designated Owners and Operators (DOO) programme. The programme aims to elevate safety and crew welfare standards in the dry bulk industry.

Swire Bulk's third-party ship managers subscribe to confidential crisis helplines and multilingual hotline services. This is made available to seafarers at no cost to the individuals. Seafarers are encouraged to use these 24-hour helplines if they feel they may need assistance from an independent third-party.

Swire Bulk will continue focusing on and working closely with its third-party ship managers while assessing modern slavery risks in the supply chain.

## **Risk Assessment, Due Diligence and Remediation Measures**

### **Risk Assessment**

A framework for identifying critical suppliers was established, reflecting operational risks. The framework allows for segmentation of suppliers based on supply chain risks, Transparency International's Corruption Perception Index, Global Slavery Index's Vulnerability score, country-level risks as well as business leverage insights to determine critical suppliers. Supplier categories are initially segmented according to their exposure to various types of risks. A supplier sustainability self-assessment questionnaire is in place.

### **Due Diligence**

All Swire Bulk owned and chartered-in vessels are ILO MLC 2006 certified. This is periodically verified through annual internal audits and during external audits by classification societies recognised by the Flag State.

For the chartered-in fleet, Swire Bulk only selects vessels that meet the requirements of RightShip Safety score of three and above. RightShip assesses and maintains the vetting status of all vessels subject to overall safety and operational performance in the last five years. These measures ensure *inter alia* appropriate minimum safety standards, and human rights criteria including living and working standards, protection of seafarers' rights and conditions of employment.

The average RightShip Scores of Swire Bulk vessels during 2024 were:

- Owned vessels' safety score: 4.54 (out of 5)
- Chartered-in vessels' safety score: 3.92 (out of 5)

Swire Bulk developed a voluntary questionnaire for crew members of the chartered-in fleet to better understand risks that include human rights and modern slavery. Questionnaires were distributed to all chartered-in vessels in 2024, and 72 responses from 97 vessels were received (74% response rate). The initial assessment was a pilot to understand the level of engagement with chartered-in tonnage and to gauge if there are any potential areas of concern. As a result, the questionnaire was improved and made available online in English, Chinese & Tagalog. This will allow crew to respond directly using their phones, ensuring confidentiality of responses. Based on the initial assessment of responses received, a follow-up self-assessment was carried out in

November with four vessels. Feedback was provided to the owners, and all queries were successfully closed out. This will be an annual assessment going forward.

Swire Bulk will work further on understanding where the modern slavery supply chain risks are, and which industries/materials might be potentially high risk. Swire Bulk will continue to review its critical suppliers, identified through the updated framework, and conduct self-assessments when and as required.

Swire Bulk is audited annually by the Group Internal Audit Department on how the Company manages third-party contractors and their policies and procedures.

### **Remediation Measures**

The whistleblowing and confidential channels allow employees and third-parties to express their concerns, including potential breaches of the Corporate Code of Conduct or policies. For vessel crew, third-party ship managers have whistleblowing procedures in place for their seagoing employees with a clear process of reporting any concerns via various channels, report assessment and investigation, corrective actions and whistleblower protection.

Swire Bulk also received a report from one of its owned vessels about an observation made during unloading operations conducted by the stevedoring company. The observation raised concerns about potential non-compliance with labour regulations, as it was suspected that two stevedores performing services might have been underage. The matter was addressed with the local agent and the stevedoring company; however, no evidence was found to substantiate the allegation. Several actions were implemented to mitigate any potential future issues.

Throughout 2024, no specific remediation measures were required in relation to modern slavery indicators, as no incidents were reported and substantiated.

### **Training and Awareness Building**

Swire Bulk has KPIs on modern slavery awareness training:

- 100% of shore-based employees to undertake modern slavery training annually; and
- Deliver training on modern slavery awareness to senior officers (delivered by third-party ship managers).

Modern slavery awareness training is a part of the governance compliance training programme, together with training on Corporate Code of Conduct, Anti-Bribery and Corruption, Anti-Trust, Workplace Harassment Prevention, Cyber Security and General Data Protection Regulation. The training is done via Swire Bulk's internal online portal and consists of a 10-minute module on understanding the UK MSA and accompanied by the course test. The compliance training programme is held annually for existing employees and is part of an induction programme for new employees. 100% of employees completed this training in 2024.

Swire Bulk also promotes awareness of modern slavery amongst seafarers during the Safety Awareness Courses conducted internally by one of the ship managers throughout the year. In 2024, 37 senior officers on Swire Bulk owned vessels attended these sessions. The other ship manager also conducts awareness sessions on the topic of modern slavery and human rights.

As part of the supplier sustainability self-assessment questionnaire, suppliers are encouraged to undergo the modern slavery training module, which was developed in-house, to assess their understanding of the issue.

## **Assessing Effectiveness and Consultation**

Swire Bulk's Sustainability team works with various stakeholders within the Company and at the Group level to embed robust governance structures in the Company's operations. In order to ensure the ability to identify and respond to modern slavery risk in relation to seafarers, Swire Bulk engages in regular dialogue with the third-party ship management companies.

Together with the Operations, Chartering and Legal teams, the Sustainability team continues to further strengthen the contractual requirements and due diligence process. Relevant policies and procedures are monitored and reviewed to ensure relevant regulatory compliance.

This statement has been approved on behalf of the Board of Directors by

**Peter Norborg**

Chief Executive Officer, Swire Bulk

16 June 2025