

Sustainably Produced Food Policy

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1. Purpose

Swire Bulk Holdings Pte. Ltd. and its group of companies (Swire Bulk) are committed to supporting the production, supply, and consumption of sustainably produced food to promote responsible resource use, minimise climate impact, and protect biodiversity.

Overfishing poses significant risks to certain marine species and their ecosystems. Swire Bulk's decision to refrain from ordering or purchasing unsustainably sourced food items, as well as its proactive efforts to seek information about product origins, may help drive positive and meaningful change across the industry.

This also demonstrates its leadership in being a good steward of the natural resources and biodiversity under its influence as specified in the [Sustainable Development Policy](#).

2. Policy Statement

Swire Bulk will ensure that food prepared or purchased for consumption at a Swire Bulk worksite, or by Swire Bulk employees at a company or third-party worksite, including company functions – is produced as sustainably as is reasonably practicable.

Swire Bulk will document any occasion where the Company is 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

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)
- Sturgeon / paddlefish caviar (Global, wild caught)
- Soft and hard-shelled turtle / tortoise (Global, wild caught)

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- 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 communicating its purpose to relevant employees and external parties is the General Manager – Sustainability and Decarbonisation.

The person responsible for arranging of food for consumption at any Swire group worksite, and / or by Swire Bulk employees at a Swire Bulk or third-party worksite, may be in HR or 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 Swire Bulk’s 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 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);
- Attendance at third-party venues such as restaurants or conference/offsite catering locations that serve any of the unsustainably produced food items listed here (e.g. shark’s fin soup) is not permitted for company business, regardless of whether these items appear on the set menu, to discourage such establishments from offering these foods.
- 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
28-10-25	Section 1, 2 and 4	4	<ul style="list-style-type: none"> - Changed job titles - Formalised pronouns
23-08-22	Section 1, 2 and 5	3	<ul style="list-style-type: none"> - Incorporate JS&S policies
19-05-21	Section 5.1	2	<ul style="list-style-type: none"> - Fat Choy (black moss) added to list of unsustainably produced food items - Document approved outside of the CGS by Simon Bennett
26-04-21	All	1	<ul style="list-style-type: none"> - Initial issue: Approved by Simon Bennett (GM-SD) by email

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