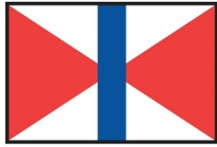


SWIRE SHIPPING

Human Rights Policy

Document Number: SD-GLB-POL-0006
Revision: 4
Date: 11 Oct 2021
Policy owner: General Manager, Sustainable Development

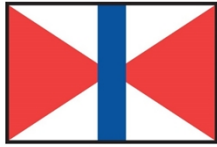
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1. Purpose

Respect for human rights is vital to the sustainability of Swire Shipping (SSL) and the communities in which we operate. SSL is committed to being an industry leader; innovating and improving standards in line with its reputation for having the best operating practices in the industry. There is both a business and a moral case for ensuring that human rights are upheld across our operations and our value chain.

2. Policy Statement

SSL is strongly committed to ensuring that all people are treated with dignity and respect.

This policy is supported by the following other SSL policies:

- [Supplier Code of Conduct](#)
- [People Policy](#)
- [Diversity and Inclusion Policy](#)
- [Modern Slavery Policy](#)
- [Whistleblowing Policy](#)

3. Application

This policy applies to all employees and contractors employed or working on board our vessels and in our offices ashore. We will also work with our suppliers to ensure that they observe and comply with the principles and contents of this policy.

4. Definitions

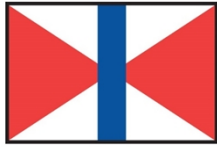
None

5. Policy Details

5.1 Respect for Human Rights

We recognise that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts. We will work to identify, prevent and mitigate any adverse human rights impacts resulting from or caused by our business activities. Our approach to Human Rights is based on the [UN Guiding Principles on Business and Human Rights](#) (informally known as the "Ruggie Principles") and the [International Labour Organisation's \("ILO"\) Declaration on Fundamental Principles and Rights at Work](#) (often

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referred to as the ILO Core Convention), and the recognition that while states have a duty to protect human rights, companies have a responsibility to respect the same. Due to the nature of our business being service orientated we will achieve the most by generally focusing our efforts on human rights issues related to labour conditions.

In particular, we support the work currently being undertaken to develop the soft-law "[Geneva Declaration on Human Rights at Sea](#)", the concept of which rests on the following four fundamental principles:

1. All human rights apply at sea to exactly the same degree and extent that they do on land.
2. All persons at sea, without any distinction, enjoy human rights at sea.
3. There are no maritime specific rules allowing derogation from human rights standards.
4. All human rights established under treaty and customary international law must be respected at sea.

We will review all areas of our existing business operations, and particularly when entering new business and/or geographical areas, through a risk-based Human Rights Impact Assessment (HRIA). Where this HRIA raises concerns they will be escalated for review at a subsequent internal Corporate Governance & Compliance Meeting. For details of this process refer to the [Human Rights Impact Assessment \(HRIA\) SOP](#).

Our [Supplier Code of Conduct](#) sets out our expectations with regards to the respect for the human rights, including labour rights, of the workers in our supply value chain.

We will ensure that both ourselves and our suppliers are independently audited to ensure their compliance with our aims, and help them raise their standards

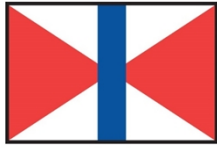
5.2 Community and Stakeholder Engagement

We are committed to engaging with our stakeholders in the communities in which we operate to ensure that we are responsive to their reasonable and relevant views on how we conduct our business. Where appropriate, we will engage in dialogue with these stakeholders on Human Rights issues related to our business operations. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

5.3 Valuing Diversity

We recognise that all businesses and their employees benefit from both the diversity present and inclusion demonstrated by their workforces. We have in place a [People Policy](#) and a [Diversity and Inclusion Policy](#) to address any areas of concern in this area.

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5.4 Forced Labour and Human Trafficking

We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking, either directly by SSL or by any of our contractors and suppliers. This will be assured through regular and independent remote and on-site auditing (as determined through objective risk assessments) of SSL and our contractors and suppliers.

5.5 Child Labour

We will ensure through regular and independent remote and on-site auditing that neither SSL nor our contractors and suppliers, will not:

- employ any person under the local legal minimum employment age, or
- employ any person in a manner which conflicts with completion of their compulsory schooling, and
- in any case employ any person below the age of 16 years on a full-time basis (unless part of a recognised professional / workplace apprenticeship programme, see below).

We require that our, and our suppliers' professional / workplace apprenticeship programmes are legitimate and that they comply with all laws and regulations governing child labour and apprenticeship programmes. This explicitly includes the requirements of the Minimum Age Convention, 1973 (No. 138) and Worst Forms of Child Labour Convention, 1999 (No. 182) irrespective of whether they have been ratified by the local country of operation.

5.6 Work Hours, Wages and Benefits

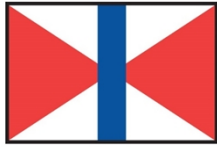
We will ensure that we compensate employees competitively in accordance with the industry and local labour market rates. We will operate in full compliance with all laws applicable to wages, work hours, overtime and all relevant benefits, and demand this of our contractors and suppliers also.

5.7 Workplace Security

We will maintain a workplace that is free from actual or threatened physical, sexual, psychological or verbal harassment or abuse, intimidation and other unsafe or disruptive conditions due to internal and external threats and demand this of our contractors and suppliers also. Proactive security safeguards are provided and reactive whistleblowing channels are established for employees and will be maintained with respect for employee privacy and dignity. Refer to the SS [Whistleblowing Policy](#)

5.8 Freedom of Association and Collective Bargaining

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We respect our employees' right to either join, or not to join, a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we will establish a constructive dialogue with the union's representatives. We are committed to collective bargaining in good faith with such representatives.

5.9 Grievance

We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. Refer to the [Grievance and Dispute Settlement Policy](#)

5.10 Monitoring and Evaluation

We will assess the effectiveness of this Human Rights policy through a formal ongoing monitoring and evaluation of our internal processes and procedures at least annually and will amend this Policy as and if required.

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.

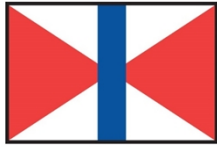
6.3 Exceptions

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

SSL reserves the right to amend this policy at its sole discretion. In case of amendments, the policy owner will inform staff appropriately.

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7.Related Documents

Level2	Level3a	Level3b	Level4
	<ul style="list-style-type: none">Human Rights Impact Assessment (HRIA) SOP		

8.Policy History

Amendment Date	Section	Revision Number	Description
11-10-2021		4	Company name changed from SS to SSL
08-10-2021		3	Company name changed from CNCo to SS. Classification changed from Internal to Public. Minor text changes.
11-06-2020		2	CGS hyperlinks added to various HR policies & and HRIA SOP included as a related L3 document

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