

Statement on Modern Slavery and Human Trafficking (2020)

This is the fifth annual Modern Slavery (“MS”) Statement to be published by the Swire Pacific Offshore (“SPO”)¹ group, for the financial year ending December 31st 2020; see [here](#) for our statement for the last financial and calendar year, 2019.

The SPO group takes very seriously our obligations under the United Kingdom Modern Slavery Act (2015) (“MSA”), the Australian Modern Slavery Act (2018) (“Aus MSA”), and in all other jurisdictions in which we work. We are committed to ensure that there is no modern slavery in our supply chains or in any part of our business. Accordingly, SPO continues to apply several compliance processes to prevent, detect and eradicate any incidences of modern slavery, including:

- Establishing a modern slavery risk assessment process within all our businesses globally;
- Using this segmented risk assessment data to better prioritise, detect and prevent forced labour across the Group;
- Prioritising audits of higher risk third-party suppliers and contractors;
- Providing best practice training for our management teams most likely to encounter potential issues with regards to modern slavery;
- Maintaining a Whistleblowing process through several channels;
- Auditing the effectiveness of our Modern Slavery compliance policies through our internal audit cycle.

Sustainability and values

SPO is committed to comply with all applicable national labour laws and the International Labour Organisation (ILO) conventions.

The SPO [Supply Chain Sustainability Code of Conduct](#), which is part of our [Corporate Code of Conduct](#), contains guidance relating to our employment practices, as well as clear prohibitions against the use of bonded, child, coerced, forced, indentured or involuntary labour in any form. We similarly require all our suppliers to comply with these policies.

The SPO group will not tolerate the practice of modern slavery in any form and is committed to continue to work with all our stakeholders and relevant regulators to combat this issue, wherever we may become aware of it.

There have been no incidences of Modern Slavery reported within, or uncovered during our risk-based audits of, the SPO group of companies, or in our supply chains, globally within the calendar year 2020.

Our actions in the last financial year

We have reviewed our processes and enhanced them where required. In 2020 we undertook the following actions to further mitigate forced labour risks:

- **Governance**

We assess our current suppliers for the potential level of modern slavery risk, through a mixture of self-audit and physical on-site audit for the detection and prevention of forced labour in our supply chain.

We committed to closing the previously prioritised on-site audits in 2020, however the global COVID-19 pandemic impacted those plans, as travel restrictions and quarantine requirements made it impossible to carry out on-site audits in the various geographies where our suppliers are located.

One of our assessed risks is with manning companies / seafarer providers. But during the pandemic our Manning department has been fully occupied with the difficulty of implementing crew changes to ensure that we protect the safety and human rights of our seafarers. We will resume on-site audits as soon as COVID-19 conditions permit.

We were audited against our Modern Slavery initiatives by our Internal Audit Department in January 2020. There was one medium rated audit finding: *Increased exposure to potential reputational risk when risks associated with suppliers / service providers are not promptly identified, assessed and mitigated.* We addressed the finding through undertaking risk assessments with relevant business units and documenting the escalation process into our Corporate Governance Manual. Self-assessments will continue to be a requirement to be on SPO's Fleet Supplier List.

Looking ahead

We will focus on the following areas over the next financial year, as COVID-19 conditions permit:

- **Governance**

We will continue to review and strengthen our policies and procedures to ensure they appropriately address modern slavery risks within our operations and our supply chain.

- **Training**

We will continue to run relevant and appropriate training programmes biennially for both existing shore and sea staff, and for new joiners as part of their induction training. The next training programme will take place in 2021. We will set up an online MS awareness module for high-risk suppliers.

- **Risk Assessments**

All outstanding physical Risk Assessments will be completed as a priority.



This statement has been approved by:

A handwritten signature in blue ink, appearing to read "Peter Langslow".

Peter Langslow

Managing Director,

on behalf of the Swire Pacific Offshore Holdings Ltd. Board of Directors

¹ References to “**Swire Pacific Offshore**” or “**SPO**” in this Statement are to Swire Pacific Offshore Holdings Ltd, Swire Pacific Offshore Operations (Pte) Ltd, Swire Pacific Ship Management Ltd (Singapore), as the context may require, (plus Swire Blue Ocean A/S, and Swire Seabed AS for the relevant period that they were subsidiaries of SPO in 2020), and/or any of their respective subsidiaries or related group companies, including but not limited to Swire Pacific Offshore Pty. Ltd. and SPSM (Aus) Pty. Ltd. In Australia.

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