



## **Policy Statement on Modern Slavery and Human Trafficking**

The China Navigation Company Limited Group<sup>1</sup> takes the commitments under the United Kingdom Modern Slavery Act (2015) very seriously.

As a business with both a history and an ethical framework of good employment practice, CNCo is committed to providing good working conditions for its employees, according to universal international standards, and to protecting their safety and health.

CNCo recognises that modern slavery as an issue has become increasingly visible and takes seriously its moral and legal duties in this regard. CNCo has put in place a number of processes across the CNCo Group to prevent, detect and manage incidences of modern slavery, including:

- Conducting modern slavery risk assessments within all of its businesses globally;
- Using this risk assessment data to identify priorities and develop actions for the detection and prevention of forced labour across the Group;
- Audits of third party suppliers and contractors;
- Providing best practice training for our management teams most likely to encounter potential issues with regard to modern slavery;
- Implementation of a Whistleblowing channel;
- The audit of Modern Slavery policy compliance policies in our internal audit risk cycle.

As part of our ongoing commitment, we will continuously review our approach to modern slavery.

### **Sustainability and values**

CNCo's Modern Slavery compliance policy is wholly aligned with CNCO's wider commitment to running all of its businesses in an ethical and sustainable manner. CNCO is committed to compliance with all applicable national labour laws and the International Labour Organization (ILO) conventions.

The CNCo [Supplier Code of Conduct](#), which is part of the CNCo [Corporate Code of Conduct](#), contains guidance relating to our employment practices, as well as clear prohibitions against the use of child labour and forced, coerced, bonded, indentured, involuntary labour in any form. We expect our suppliers to meet these expectations.

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

Signed

Managing Director

October 2016

<sup>1</sup> References to "The China Navigation Company Ltd" or "CNCO" in this Policy include Swire Bulk, Swire Bulk Logistics, Swire Shipping, Swire Shipping Agencies and/or, as the context may require, any of their respective subsidiaries or group companies.