

OCEAN NETWORK EXPRESS

MODERN SLAVERY STATEMENT

November 2021

This statement is made pursuant to Section 54(1), of the Modern Slavery Act 2015 (UK) and constitutes Ocean Network Express Pte. Ltd. and Ocean Network Express (Europe) Ltd's (together as "ONE") slavery and human trafficking statement for the financial year ending 31 March 2021.

This statement sets out the steps taken by ONE to prevent modern slavery and human trafficking in its business and supply chains.

OUR STRUCTURE

ONE is a global container shipping business operating worldwide with headquarters in Singapore.

OUR POLICIES ON COUNTERING MODERN DAY SLAVERY AND HUMAN TRAFFICKING

'Modern Day Slavery' is an umbrella term, which in the context of global supply chains often relates to cases where individuals are subject to human trafficking, forced labour, or debt servitude; where coercion, threats or deception are used to intimidate, penalize or deceive workers, thereby creating situations of involuntary work and exploitation.

ONE CREDO AND CODE OF CONDUCT

We are committed to ensuring that there is no Modern-Day Slavery, human trafficking, forced labour or debt servitude in our supply chains nor in any part of our business. Our Credo and Code of Conduct reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure Modern Day Slavery (as defined above) is not taking place anywhere in our supply chains.

UNITED NATIONS GLOBAL COMPACT

To be part of a global movement towards conducting business in a responsible and sustainable manner, ONE is a member of Global Compact Network Singapore (GCNS), the local chapter of the United Nations Global Compact (UNGC) network. ONE supports the ten UNGC Principles and has pledged to adopt and promote sustainable and responsible business practices. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

ONE is committed to respecting the ten principles, including Principle 4: the elimination of all forms of forced and compulsory labour. ONE's Code of Conduct Chapter 4 'Respect for Human Rights and Diversity of Cultures' contains 'Clause 4-4: Prohibiting Forced Labour or Child Labour', which states 'ONE does not engage in inhumane acts such as forced labour or child labour and ONE does not conduct trade with business enterprises engaged in such acts.'

DUE DILIGENCE PROCESSES IN OUR SUPPLY CHAIN

As part of our initiatives to identify and mitigate risk, we have taken steps to integrate sustainability and compliance into our purchasing processes, by measuring and ensuring compliance with social and environmental standards.

ONE SUPPLY CHAIN MANAGEMENT GUIDELINE

ONE recognises that to achieve our sustainability and compliance ambitions, we must bring our suppliers and business partners on board. As a business, we purchase products and services from a range of companies. Critical to our operations are terminal operators, inland and coastal transportation companies, ships and container owners, bunker suppliers and IT vendors, without whom our core business activities cannot take place.

To ensure our high standards of sustainability and business conduct are upheld along our supply chain, ONE launched our Supply Chain Management Guideline (the Guideline). The Guideline calls on all ONE's suppliers and business partners to respect human rights, business norms and compliance. Respect of human rights includes -

Elimination of forced, bonded or child labour

Compliance with labour-related laws and regulations of each country

Equal terms of employment and treatment

Improvement of working environment concerning safety and health

Fair wages treatment

Procurement staff are required to share the Guideline with potential vendors.

https://www.one-line.com/sites/g/files/lnzjqr776/files/2019-04/ONE%20Supply%20Chain%20Global%20Guideline_201810_EN.pdf

MONITORING AND REVIEW

ONE has taken steps to ensure that there is no Modern-Day Slavery or human trafficking in any part of our business. As this is an ongoing process, the adequacy of these steps is subject to annual review.

Planning & Administration Department in GHQ has responsibility for implementing this statement and providing adequate resources to ensure that Modern Day Slavery is not taking place within ONE's business or its supply chains.

TRAINING

We provide training to ensure that managers in ONE have a thorough knowledge of the ONE Code of Conduct and the Supply Chain Management Guideline and can act accordingly, sharing knowledge of this document and ensure a culture of compliance within their own organisation. The year 2020-21 saw the development and rollout of bespoke Modern-Day Slavery training via our e-learning platform. This training provided to all staff across the organisation with materials and quizzes to reinforce organisational awareness of the company's commitment to recognise the risks of Modern-Day Slavery in its business and all the pertinent steps ONE is taking to prevent modern slavery and human trafficking in its business and supply chains.

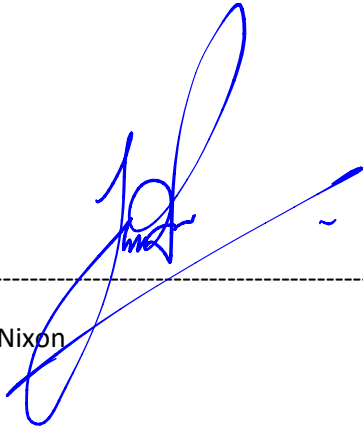
WHISTLEBLOWING PROGRAM

Employees are encouraged, via our Whistleblowing program to identify and report any potential violations of applicable laws, internal rules and procedures, the ONE Code of Conduct and the Supply Chain Management Guideline. All reports are processed, investigated as applicable, and when justified, appropriate measures are taken.

MODERN SLAVERY STATEMENT REGISTRY

From November 2021 ONE will make this Statement available via the UK Government's Modern Slavery Statement Registry <https://modern-slavery-statement-registry.service.gov.uk/search>. The Registry has been designed to make it easier for consumers and investors to search for businesses Modern Slavery Statements.

This statement was approved by the Board of Directors on 23rd November 2021.



Jeremy Nixon

CEO

Ocean Network Express Pte. Ltd.



Signature,

Shunichiro Mizukami

Director

Ocean Network Express (Europe) Ltd.