

OCEAN NETWORK EXPRESS MODERN SLAVERY STATEMENT

October 2022

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 2022.

This is our third Modern Slavery Statement. Building upon our past statements, ONE further underscores our continued commitment to prevent modern slavery and human trafficking in global business and supply chains, through the introduction of material goals and key performance indicators ("KPIs") to measure the effectiveness of our actions and progress.

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; or 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 business relationships. Ensuring the implementation and enforcement of effective systems and controls against Modern Day Slavery within 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 all ten principles, including Principle 4: the elimination of all forms of forced and compulsory labour. ONE's Code of Conduct also reflects this respect in Chapter 4: "Respect for Human Rights and Diversity of Cultures", 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 (detailed below) 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. 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. Accordingly, our Guideline encourages–

- 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: [Supply Chain Management Guideline](#)

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.

The Corporate & Innovation Division 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. Additionally, ONE undertakes an annual EcoVadis¹ sustainability assessment comprising 21 sustainability criteria definitions, with 4 measures being of direct pertinence to Modern Slavery issues.

As ONE continues to expand our scope of operations, we recognize that our risk landscape continues to evolve. In view of this, ONE undertakes an annual review of our measures to combat Modern Slavery, to ensure adequate coverage and governance.

Goals	FY 2021/22 Status	FY 2022/23 Status
Awareness of Modern Slavery Act in the Organization	92% completion rate for e-learning module	100% completion rate for e-learning Training Refresh through gamification

¹ EcoVadis is the world's most trusted evidence-based assessment platform with a global network of over 90,000 companies.

Enhanced Employee Engagement	Training via e-learning platform	Further initiatives like the EUA Modern Slavery Act SmartCard - an internal tool which details concisely key aspects of compliance matters and their importance; and GHQ Compliance Poster roll-out
Extended Scope for Supplier Contracts	MSA clauses are currently incorporated into Vendor Contracts originating from the UK	Incorporation of MSA clauses in globally managed Vendor Contracts across the Organization
Downstream Audit and Monitoring	Not Applicable	Introduction of Supplier Declaration
Supply Chain Management Guideline	Kickstarted efforts to collaboratively work with Procurement team in the exploration of digital solutions.	Full Implementation of digital tools (SAP Ariba) to achieve 100% Supplier Acknowledgement of Compliance from Q4 2022

TRAINING

We provide training to ensure that managers in ONE have a thorough knowledge of the ONE Credo, Code of Conduct, and the Guideline and can act accordingly, sharing knowledge of these documents and ensuring 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 is provided to all staff across the organisation, with materials and quizzes to re-enforce 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, which seeks to encourage effective communication, and to identify any potential violations of applicable laws, internal rules and procedures, the ONE Credo, Code of Conduct and the Guideline. All reports are processed, investigated as applicable, and when justified, appropriate measures are taken.

OUR COVID-19 PANDEMIC RESPONSE

COVID-19 has shed a spotlight on the exacerbated vulnerability of crew at sea. Accordingly, as a founding signatory to the Neptune Declaration² for Seafarer Wellbeing and Crew Change, and platinum sponsor of the Mission to Seafarers "Sustaining Crew Welfare" campaign, ONE will continue to be committed to addressing this increased vulnerability; ensuring the sustained wellbeing of our maritime frontliners and the enhancement of our culture of care, through the pandemic and beyond.

² The Neptune Declaration, signed by more than 850 organizations, outlines the main actions that need to be taken to resolve the crew change crisis due to COVID-19 related travel bans.

MODERN SLAVERY STATEMENT REGISTRY

From October 2022, ONE will make this statement available via the UK Government's [Modern Slavery Statement Registry](#). The Registry has been designed to make it easier for consumers and investors to search for the Modern Slavery Statements of businesses.

This statement was approved by the Board of Directors on 06 October 2022.



Date of Signature: 11/10/22
Jeremy Nixon
CEO
Ocean Network Express Pte. Ltd.



Date of Signature: 12/10/22
Shunichiro Mizukami
Director
Ocean Network Express (Europe) Ltd.