

OCEAN NETWORK EXPRESS MODERN SLAVERY STATEMENT

September 2026

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**") modern slavery and human trafficking statement for the financial year ending 31 March 2026.

This is ONE's seventh Modern Slavery Statement. In line with the prior statements, ONE further underscores our continued commitment to prevent modern slavery and human trafficking in global business and supply chains, through sustained efforts to document and communicate progress towards our material goals and key performance indicators ("KPIs").

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 servitude; or where coercion, threats or deception are used to intimidate, penalise, or deceive workers, thereby creating situations of involuntary work and exploitation.

I. ONE BUSINESS CREDO AND CODE OF CONDUCT

The ONE Business Credo is our foundational commitment to conducting business in good faith. Clause 3 affirms that we "Observe ethical conduct and compliance with laws and regulations" and Clause 4 affirms that we "Nurture an inclusive workplace and respect for human rights." ONE is committed to ensuring that there is no Modern Day Slavery, human trafficking, forced labour or servitude in our supply chains nor in any part of our business.

The ONE Code of Conduct guides the daily ethical behaviour and decision-making of every ONE employee. Our commitment to act ethically and with integrity in all business relationships, and to ensure the implementation and enforcement of effective systems and controls against Modern Day Slavery within our supply chains is emphasised in Chapter 4-8: "Prohibiting Forced Labour or Child Labour", which states that "ONE does not engage in and firmly rejects any form of modern slavery, human trafficking, forced labour, servitude, child labour, or any other inhumane practices in any aspect of our

business. ONE Employees are expected to ensure that ONE does not conduct business with suppliers, contractors, or partners known to participate in such practices."

II. 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.

We recognise our role in society and act in a manner that is fair and just by complying with national laws and ordinances and international norms.

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 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 of ONE's suppliers and business partners to respect human rights, business norms and compliance. Accordingly, the 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; and
- Fair wages treatment.

Procurement staff are required to share the Guideline with potential vendors, and new suppliers are required to formally acknowledge and comply with the Guideline as a requirement of ONE's ESG screening process for supplier onboarding: **Supply Chain Management Guideline**.

In FY2025, 98% of new suppliers agreed to comply with the Guideline, up from 96% in FY2024.

2. 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.

A Modern Slavery Risk Assessment has been rolled out throughout the Europe and Africa region, on a departmental basis. Department heads are responsible for identifying Modern Slavery risks that exist within their area of responsibility, documenting the controls in place to mitigate such risks, and implementing any additional controls or enhancements required. The Risk Assessment initiative is an ongoing and evolving repository of risk rather than a static document.

The Corporate & Innovation Division in our Global Head Quarters (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 recognise 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.

The table below outlines ONE's progress and future action:

Goals	FY 2024 Status	FY 2025 Achievements	FY 2026 Aims
Awareness of Modern Slavery Act in the Organisation	• 98% completion rate for e-learning • Roll-out of 'Bitesize' Awareness Training on Modern Slavery • Design and Roll-out of GHQ Compliance Posters • Specialised GHQ poster roll-out in EUA to raise awareness on	• Refreshment of Modern Slavery knowledge and principles through Annual Compliance Quiz mandatory for all employees. • Targeted awareness level through new initiatives, including Workshops and specific in-person training for Compliance Officers.	• Expanding scope of Modern Slavery Awareness campaigns to Customers. • Enhanced 'Tone-from-the-Top' and 'Tone-from-the-Middle' campaigns embedding anti-Modern Slavery into organisational culture.

	World Day against Trafficking in Persons		
Enhanced Employee Engagement	- Delivered Modern Slavery training during the Compliance Officer Event - Periodic features in weekly sustainability newsletter - Incorporated ONE's commitment to the Modern Slavery Act in the EUA 'Annual Tone-from-the-Top' Video Message delivered by Board Director.	- Continuous education and engagement activities to increase awareness. - Workshop-based Awareness Training followed by a questionnaire to enhance engagement.	ONE's 'Business Credo' & 'Code of Conduct' were updated in April 2026, which include our re-affirmed commitments against Modern Day Slavery. Mandatory E-Learning for all Employees will be completed by 30 Sept.
Extended Scope for Supplier Contracts	- Mandated compliance with ONE's Supply Chain Management Guideline for new suppliers onboarded in FY2024. - Continue promotion of MSA clauses and Modern Slavery Checklist in globally managed vendor contracts	- Promotion of MSA clauses and Modern Slavery Checklist in globally managed vendor contracts - Broadened the Risk Assessment framework to cover all offices in the Europe and Africa Region.	- Continued inclusion of Modern Slavery clauses into third party contracts. - Ongoing review of Modern Slavery Risk Assessment Initiative in the Europe and Africa region.

¹EcoVadis is the world's most trusted evidence-based assessment platform with a global network of over 150,000 companies.

3. TRAINING

ONE's e-learning platform provides all employees with perpetual access to Modern Slavery training resources, reinforcing organisation-wide awareness of ONE's

commitment to recognise and eradicate the risks of Modern Day Slavery in our operations, business landscape and supply chains.

In addition to the e-learning platform, other forms of 'on-demand' Modern Slavery training are provided. Our 'SmartCard' is readily available on the internal portal and provides visually impactful and summarised information on the Modern Slavery Act (MSA) as well as our internal policies. Our 'BiteSize' training delivers key Modern Slavery information in a short and easy to digest animated video format. Both the Modern Slavery SmartCard and BiteSize are frequently referred to throughout our organisation as handy refreshers of Modern Slavery internal policy, red flags and preventative practices.

Modern Slavery training is also included in ONE's targeted, in-person or virtual training events. This includes the Europe & Africa Annual Compliance Officers' Meeting and Compliance 'Outreach' training delivered to local offices on a rotating basis.

ONE's Annual Compliance Refresher Quiz is conducted globally and includes questions on Modern Slavery to assess employee awareness, which is based on correct answers. Employee awareness level for Modern Slavery in FY2025 is 87%, an increase from 72% in FY2024.

4. WHISTLEBLOWING PROGRAMME

All employees are regularly educated on our whistleblowing programme, known as the SpeakUp! ONE Hotline, which seeks to encourage the effective communication and identification of potential violations of applicable laws, including the MSA internal rules and procedures, ONE Business Credo, ONE Code of Conduct, and the ONE Hotline Policy. At present, no hotline reports have ever been made pertaining to Modern Slavery. Reports made to the ONE Hotline System will be promptly investigated and, where appropriate, disciplinary action will be taken. Employees who make a report in good faith will be protected from retaliation.

KEY HIGHLIGHTS SINCE LAST PUBLICATION

As part of our continuous improvement and review process, ONE has undertaken further actions since the previous Modern Slavery Statement:

- Rollout of an ongoing Department-level Modern Slavery Risk Assessment Initiative to identify and mitigate risk, in all countries that ONE operates in throughout the Europe and Africa region; and
- Launch of a new Global ONE Business Credo & Code of Conduct, including a strengthened stance against any forms of Modern Slavery in our business or supply chains.

As a responsible global ocean carrier, ONE is committed to continually improving our efforts to eradicate Modern Slavery and human trafficking in our business and broader network.

MODERN DAY SLAVERY STATEMENT REGISTRY

From September 2026, 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 18 September 2026.

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Date of Signature: 9/10/2026
Tomohiro Hosaka
Managing Director
Ocean Network Express (Europe) Ltd.



Date of Signature: 18 September 2026
Till Ole Barrelet
Chief Executive Officer
Ocean Network Express Pte. Ltd.