

**OCEAN NETWORK EXPRESS
MODERN SLAVERY STATEMENT**

October 2023

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 2023.

This is our fourth 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 CREDO AND CODE OF CONDUCT

We are 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. Our Credo and Code of Conduct reflects our commitment to act ethically, and with integrity in all business relationships. Our Code of Conduct, highlights this in Chapter 4: "Respect for Human Rights and Diversity of Cultures", Clause 4-4: "Prohibiting Forced Labour or Child Labour", which states that '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'. This is further enhanced in our Credo under Clause 4 'Compliance with laws and ordinances, respect for human rights'. Ensuring the implementation and enforcement of effective systems and controls against Modern Day Slavery within our supply chains.

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 recognize 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.

1. 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, 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
- Fair wages treatment

Procurement staff are required to share the Guideline with potential vendors: [Supply Chain Management Guideline](#)

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.

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.

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

Goals	FY 2021/22 Status	FY 2022/23 Achievements	FY 2023/24 Aims
Awareness of Modern Slavery Act in the Organisation	92% completion rate for e-learning module	98.8% completion rate for e-learning (all active employees not on extended leave or probation) Enhanced Modern Slavery awareness in Compliance Officer Event 2023 Annual Compliance Refresher underway	Continuous Refresher Training Annual Compliance Refresher Awareness tools for Compliance Officers to ensure further understanding across their jurisdiction
Enhanced Employee Engagement	Training via e-learning platform	EUA Modern Slavery Act SmartCard roll-out GHQ Compliance Poster roll-out GHQ Sustainability Team's World Day Against TIP 2023 Observance event	Continuous education and engagement activities to increase awareness Periodic features on Internal social media platform's weekly sustainability newsletter
Extended Scope for Supplier Contracts	MSA clauses are incorporated into Vendor Contracts originating from the UK	Successful Incorporation of MSA clauses and Modern Slavery Checklist in globally managed Vendor Contracts	Incorporation of MSA clauses and Modern Slavery Checklist in globally managed Vendor Contracts
Downstream Audit and Monitoring	Not Applicable	Preparation of the Depot Audit for FY 2023/24	Roll-out of depot audit in the pipeline for FY 2023/24
Supply Chain Management Guideline	Collaboration with Procurement team on the exploration of digital solutions	Implementation of SAP Ariba since Aug 2022 23% of newly onboarded vendors have acknowledged the SCMG	Increased SCMG training rendered to procurement managers and teams - to spur progress towards our 100% Supplier Acknowledgement goal

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

3. 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. 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 training are provided on Modern Slavery. Our SmartCard on Modern Slavery provides readily accessible information on the Modern Slavery Act (MSA) as well as our internal policies. The information on this SmartCard has been used to provide several training sessions across our organisation and region.

We have also conducted a specific Modern Slavery training in our Compliance Officer Event, held in September 2023. This sought to raise awareness of key risk areas and current geopolitical developments that may cause vulnerabilities. A workshop was held to further train our Compliance Officers in identifying Modern Slavery risks.

4. WHISTLEBLOWING PROGRAMME

All employees are educated on the ONE Hotline, our whistleblowing programme, which seeks to encourage the effective communication and identification of potential violations of applicable laws, including the MSA internal rules and procedures, ONE Credo, Code of Conduct, and the ONE Hotline System Guideline. At present, no reports have ever been made pertaining to Modern Slavery. Reports made to the ONE Hotline 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:

- Incorporation of a direct link and reference to our Modern Slavery Statement in ONE's 2023 Sustainability Report
- Launch of ONE's inaugural "World Day Against Trafficking in Persons" observance event (GHQ), to create awareness of Modern Slavery issues and further promote the use of ONE Hotline
- Development of the Modern Slavery SmartCard and publication on the EUA Legal Portal. Our Modern Slavery SmartCard highlights the importance of the MSA as well as its importance to ONE's business activities and our internal policies. Inclusion of Modern Slavery as a key Compliance topic in our Compliance Officer (CO) Event held in September. The objective was that the COs would continue to raise awareness in their jurisdictions, by learning how to identify key areas of risk.
- Incorporation of Modern Slavery clauses and Modern Slavery Checklist in globally managed Vendor Contracts.
- Inclusion of Modern Slavery as part of the annual compliance refresher assessment.


While a significant proportion of our employees are based in countries with low Modern Slavery risks, with established legal frameworks and a broad cultural awareness that safeguards human and labour rights, ONE has nonetheless initiated a process to review the need for a comprehensive Modern Slavery Risk Assessment in view of expansions to our business and operating landscape.

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 October 2023, 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 2023.


_____ Date of Signature: 10 October 2023

Jeremy Nixon
CEO
Ocean Network Express Pte. Ltd.


_____ Date of Signature: 10 October 2023

Takahiro Kikuchi
Managing Director
Ocean Network Express (Europe) Ltd.