

Policy Statement on Modern Slavery and Human Trafficking

The Swire Pacific Offshore (SPO)¹ Group takes its obligations under the United Kingdom Modern Slavery Act (2015) very seriously and is committed to ensure that there is no modern slavery in our supply chains or in any part of our business. Accordingly, SPO has put in place a number of compliance processes to prevent, detect and eradicate any 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.

Sustainability and values

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

The SPO Supply Chain Sustainability Code of Conduct, which is part of the Swire Pacific Offshore Corporate Code of Conduct, [see <http://www.swire.com.sg/Sustainability/Policy-Code-Governance.aspx>], contains guidance relating to our employment practices, as well as clear prohibitions against the use of bonded, child, coerced, forced, indentured or involuntary labour in any form. We similarly require our suppliers to comply with these policies.

The SPO 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



¹ References to "Swire Pacific Offshore" or "SPO" in this Policy are to Swire Pacific Offshore Holdings Ltd, Swire Pacific Offshore Operations (Pte) Ltd, Swire Pacific Ship Management Ltd (Singapore), Swire Blue Ocean A/S, Swire Seabed AS and/or, as the context may require, any of their respective subsidiaries or group companies.