

Modern Slavery Act Transparency Statement 2018

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. It sets out the steps OOCL Logistics (Europe) Limited (hereafter “OLL”) has taken to prevent acts of modern slavery and human trafficking from occurring in its business and supply chain, up to and during the financial year ending 2018.

Introduction

OLL recognises its legal and moral obligations to comply with the UK’s Modern Slavery Act 2015 and we respect the rights and dignity of all persons with whom we deal. The Act defines modern slavery as “slavery, servitude, and forced or compulsory labour” as well as “human trafficking”. We are absolutely committed to ensuring that modern slavery in any form has no place in or around our organisation.

This statement endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

Business Structure, Operations and Supply Chain

OLL is a wholly owned subsidiary of Orient Overseas International Limited (OOIL) (hereafter “the Group”). The Group’s principal business activities are container transport and logistics, which include containerised shipping services in major trade lanes.

With an extensive service network, OLL is a logistics services provider offering innovative supply chain services from basic freight consolidation to a full spectrum of advanced supply chain operations and management programs while providing transportation, warehousing and distribution services to support professional and efficient 3PL, 4PL and Omni-Channel distribution solutions.

OLL’s procurement spend in the UK is small, and we partner with suppliers that adopt the same standards that we do. We expect our suppliers to operate fair and ethical workplaces and practices, where workers are treated with dignity and respect, and the standards of human rights are upheld.

Policies

OLL has taken steps to ensure modern slavery is not taking place through active participation in the Group’s global policies, many of which are relevant to modern slavery and human rights. This includes the Code of Conduct, Sustainable Procurement Policy, Whistleblower Policy, and Grievance Handling Policy. Our employees are made aware of these policies and procedures during onboarding and through annual review.

Code of Conduct

We expect our employees to know and adhere to the standards set out in the Group's Code of Conduct. This includes respecting the provisions of the United Nations Universal Declaration of Human Rights, the United Nations Global Compact on Human Rights Principles and the Conventions of the International Labour Organization in regard to:

- Elimination of all forms of forced, compulsory and child labor
- Freedom of employment & association
- Respect for the individual and elimination of discrimination through embracement of diversity in workplace
- Safe and healthy working conditions
- Payment of living wages, provision of essential welfare and regular employment entitlements
- Non-excessive working hours

Our Code of Conduct is shared with employees via the intranet and is available for business partners as needed.

Sustainable Procurement Policy

We expect our suppliers to know and adhere to standards related to safety, quality and environmental protection set out in the Group's Sustainable Procurement Policy. This includes promoting ethical sourcing practices.

Whistleblower Policy

We encourage honest and open communication. The Whistleblower Policy is one of the Group's formalised procedures through which employees can anonymously file reports or register concerns and it governs the reporting and investigation of allegations of any suspected improper activities.

Grievance and Reporting

OLL has a process in place for handling workplace grievances raised by employees, as outlined in the Group's Grievance Handling Policy, to ensure that all of these matters can be resolved in a fair, consistent and expeditious manner and in strict confidence. The immediate supervisor, regional Human Resources and Administration Department or any other person as appointed by OLL (if independent investigation and/or arbitration is necessary and appropriate) may conduct this.

We will communicate the result of any such investigation and/or arbitration through channels deemed appropriate by OLL to the employee. If employees feel particularly vulnerable, grievances can be lodged anonymously.

Risk Assessment and Due Diligence

As part of our commitment to maintain the Group's standards of business ethics, we regularly monitor and evaluate if it is necessary for us to launch risk assessments involving human and labour rights issues for any existing, new and/or potential operations or projects. In addition, we assess our vendors' policies, practices and performance related to human and labour rights through a questionnaire.

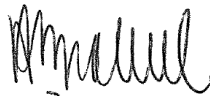
Key Performance Indicators linked to Modern Slavery and Human Trafficking

To measure the effectiveness of our efforts, we monitor the incidence of discrimination and labour rights issues, as well as incidence of human rights violations. We have not received any reports on non-compliance, violations or grievance related to human and labour rights issues in the reporting year.

Training

We train our Human Resource Administration employees on all Global HR policies and employment law, and ensure they are aware of any changes.

This statement has been approved by the Board of Directors of OOCL Logistics (Europe) Limited.



Andreas Brakel
General Manager
OOCL Logistics (Europe) Limited
August 2019