



ANL CONTAINER LINE PTY LTD

Reporting Period 1 January to 31 December 2025

ANL CONTAINER LINE PTY LTD | LEVEL 11, 30 CONVENTION CENTRE PLACE, SOUTH WHARF
VIC 3006



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1. INTRODUCTION

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) by ANL Container Line Pty Ltd (**ANL**) as the reporting entity for the year from **1 January to 31 December 2025**, on behalf of itself and its subsidiaries.

ANL is an Australian-registered company and a wholly owned subsidiary of CMA CGM S.A. (**CMA CGM**), headquartered in Marseille, France. CMA CGM is the parent company of the CMA CGM group companies (**CMA CGM Group**), an international leader in integrated container transportation and logistics services across 177 countries globally.

Regionally, ANL's executive management operates from Melbourne headquarters. The senior management structure encompasses specialist expertise across Human Resources, Procurement, Operations, Strategy, Sustainability, and Legal functions. This management team holds direct responsibility for ANL's adherence to human rights obligations, including compliance with Australia's Modern Slavery Act requirements.

2. ANL'S BUSINESS & OPERATIONAL STRUCTURE

ANL is the principal subsidiary of the CMA CGM Group in the Oceania region and now operates as Australia's largest containerised ocean freight carrier. Its operations are centred on providing end-to-end container shipping and logistics services across key trade corridors spanning Intra-Oceania, Asia-Oceania, and North America, forming a critical component of regional supply-chain connectivity and maritime logistics.

To meet its service demands, ANL's businesses are structured across three core segments in the Oceanian region: container shipping, container depot management, and shipping agency services. The company delivers these activities through a network of subsidiary entities, including **ANL Singapore Pte Ltd (ANLS)**, **ANL Timor Unipessoal Lda (ANL Timor)**, **ANL Agencies PNG Limited (ANL PNG)**, and **CCIS ANL Australia Pty Ltd (CCIS ANL Australia)**.

ANL Container Line Pty Ltd

└─  **ANL Singapore Pte Ltd (ANLS) – Shipping / Maritime**

└─  **ANL Timor Unipessoal Lda (ANL Timor) – Shipping Agencies**

└─  **ANL Agencies PNG Limited (ANL PNG) – Shipping Agencies**

└─  **CCIS ANL Australia Pty Ltd (CCIS ANL Australia) – Container Depot**



ANL's business is further supported by an established ecosystem of third-party suppliers that provide essential services such as vessel chartering, fuel supply, stevedoring operations and intermodal transports.

These supplier relationships are strategically integrated into ANL's service supply chain, enabling the company to maintain a strong and consistent presence across Asia, Pacific Island nations, and the broader Oceania region. This interconnected supply network forms a key component of ANL's ability to deliver reliable, resilient, and increasingly sustainable shipping solutions.

For its onshore Australian operations, ANL also engages a broad network of general business suppliers, such as office supplies procurement, cleaning services, and external IT services. Whenever practicable, ANL prioritises procurement from Indigenous-owned businesses, reinforcing its commitments outlined in its Reconciliation Action Plan.

3. IDENTIFYING POTENTIAL RISKS IN OPERATIONS AND SUPPLY CHAINS

As part of the CMA CGM Group, ANL operates under the broader corporate responsibility and compliance framework of its parent organisation, which sets the standards for our approach to human rights and modern slavery risks. We apply the Group's ethics, conduct and compliance policies across our global operations and supply chains, and align our procedures with these Group-wide expectations as they continue to evolve.

At its core, CMA CGM is committed to continually strengthening its human rights due diligence, applying a risk-based approach across its own operations and supply chain. This includes robust processes to identify, prevent, mitigate, and remedy adverse human rights risks and impacts, with particular focus on those relating to modern slavery and human trafficking.

In 2025, CMA CGM completed a comprehensive human rights risk mapping exercise for the Group's shipping, container depot and terminal activities, aligned with the United Nations Guiding Principles on Business and Human Rights. As a French registered company, CMA CGM undertook the risk mapping exercise to also comply with its obligations under the French Duty of Vigilance Law. Salient risks across the Group's operations and supply chain were assessed and measured. The findings, together with proposed mitigation actions, were presented to the relevant governance bodies at the end of the reporting year.

Amongst the results of this risk mapping, forced labour was assessed to be one of the salient risks. Key indicators of concern include the charging of unlawful recruitment fees, retention of workers' identity documents, restrictions on freedom of movement, and the use of misleading, opaque, or coercive contractual arrangements. These risks are heightened in circumstances where third-party recruitment agencies are engaged to source seafarers or temporary labour, given the potential for reduced visibility over recruitment practices and worker conditions.



At a regional level, ANL's businesses and operations in Australia, New Zealand and Singapore benefit from the strength of the regulatory environments in these jurisdictions, the stability and transparency of ANL's employment arrangements, and the Group's established policy and compliance framework. Employees are engaged under lawful and well-regulated employment conditions, supported by annual training and internal controls aligned with CMA CGM Group standards.

Nevertheless, ANL places strong emphasis on ensuring that its workforce remains informed about modern slavery issues and broader human rights expectations. Building organisational awareness is treated as an ongoing responsibility. To support this, ANL delivers modern slavery awareness training across the company and reinforces key messages through targeted internal communications, helping employees recognise risks and uphold responsible practices in their day-to-day roles and interactions with suppliers.

Furthermore, as ANL continues to expand its footprint in emerging shipping markets across the Pacific Islands, its operating environment becomes markedly different from the highly regulated settings of Australia and Singapore. In the Pacific region, ANL's services are supported through a combination of subsidiary agencies and locally based third-party service providers operating across multiple jurisdictions. Several of these jurisdictions face constraints linked to developing governance systems, varying levels of economic resilience, and evolving labour and social protections. These conditions may increase the potential exposure to modern slavery risks within parts of ANL's regional operations. ANL recognises that operating in diverse and developing markets presents unique challenges, requiring heightened vigilance and tailored risk-management approaches.

4. ACTIONS TAKEN TO ADDRESS THE RISK OF MODERN SLAVERY

A. Specific Actions in 2025

- Strengthening due diligence processes

In 2025, the CMA CGM Group strengthened its human rights due diligence framework by enhancing the way it evaluates suppliers and subcontractors and by updating its internal purchasing policy – "The Way to Buy". These improvements were designed to ensure more consistent, risk-based scrutiny of third-party practices and to reinforce alignment with the Group's broader human rights commitments.

The CMA CGM Group also initiated measures to improve due diligence processes for customers and business partners. For counterparties involved in mergers and acquisitions, a more detailed, multidisciplinary assessment procedure has been introduced to identify and evaluate potential human rights risks at an early stage.



- **Working group on illegal recruitment fees in the maritime industry**

As mentioned above, the 2025 human rights risk mapping exercise identified illegal recruitment fees as a significant human rights risk for seafarers, exposing them to debt bondage and severe financial and psychological consequences for themselves and their families.

In relation to this problem, CMA CGM joined the *Action Group on Seafarer Recruitment Fees*, an initiative led by the Institute for Human Rights and Business. Bringing together shipowners, charterers, cargo owners and other maritime stakeholders through regular working groups, the initiative aims to eradicate illegal recruitment fees and reduce the associated risks of forced labour and debt bondage within the maritime sector.

This engagement complements the measures already implemented by CMA CGM in relation to the recruitment of seafarers through third-party agencies. These measures include the imposition of contractual obligations requiring agencies to uphold human rights standards, including as regards modern slavery, and audits to assess and verify compliance.

B. Policies on Modern Slavery and Human Trafficking

On a day-to-day basis, ANL's approach to preventing modern slavery is grounded in the CMA CGM Group's overarching strategy concerning the prevention of human rights violations within its own operations and supply chain. As such, ANL operates under a suite of Group-wide policies that are regularly reviewed and strengthened to reflect evolving international standards and expectations.

Central to this framework is the **Code of Ethics**, which applies to all CMA CGM Group employees worldwide. The Code sets clear expectations for ethical conduct, integrity, and compliance, and expressly prohibits the direct or indirect use of forced labour. It also makes clear that all forms of modern slavery, including slavery, servitude, and human trafficking, are unacceptable. All ANL employees and those within its subsidiaries are required to comply fully with the Code.

The Group's **Human Rights Policy** further articulates CMA CGM's approach to respecting human rights across its global operations. It identifies the human rights areas most relevant to the Group's activities and outlines the standards expected in each area. Modern slavery, human trafficking, and child labour are highlighted as priority risks, and the Group adopts a strict zero-tolerance stance towards these practices.

Externally, ANL's engagement with suppliers and business partners is governed by the **Third-Party Code of Conduct**, which sets out the minimum ethical and human rights standards expected of all suppliers, subcontractors, and partners. The Code requires adherence to internationally recognised human rights norms, including prohibitions on child labour, forced or involuntary labour, and unsafe or degrading working conditions. ANL incorporates



the Third-Party Code of Conduct into all service agreements, ensuring that compliance with these standards is a binding contractual obligation for any supplier working with ANL entities.

C. Sustainable and Responsible Procurement Process

In line with the CMA CGM Group approach, ANL manages modern slavery risks within its supply chain through a structured sustainable-procurement approach supported by a range of tools, controls, and contractual safeguards. As a baseline requirement, all ANL service agreements include binding obligations requiring suppliers and subcontractors to respect internationally recognised human rights standards. These obligations reflect the CMA CGM Group's Third-Party Code of Conduct or, where applicable, equivalent commitments adopted by the supplier.

To operationalise this commitment, ANL employs several complementary mechanisms. A supplier-screening and risk-monitoring software is used to identify potential human rights concerns, including indicators of modern slavery or human trafficking at the qualification stage and throughout the duration of the commercial relationship, enabling early intervention and coordinated corrective action where necessary. High-risk suppliers and subcontractors are required to complete enhanced sustainability questionnaires, the human rights components of which were strengthened in 2025. Oversight of the most sensitive cases is provided by a cross-functional Supplier Risk Committee at CMA CGM HO, which reviews high-risk matters and may determine that an action plan, suspension, or termination of the supplier relationship is warranted.

D. KYC/KYP & Whistle-blower framework

ANL's due diligence processes extend beyond its supply chain and encompass its customer and business-partner relationships. As part of the broader CMA CGM Group approach, ANL benefits from established "know your customer" (KYC) procedures that help identify potential ethical or regulatory concerns before entering or continuing a commercial relationship. The Group's shipping systems automatically flag customers who, may present heightened risks—such as those associated with regulatory breaches or unethical behaviour such as human rights violations—allowing ANL to categorise risk levels and, where necessary, decline transactions.

Complementing this, the Group conducts "know your partner" (KYP) due diligence for a range of counterparties, including agencies, joint-venture partners, and entities involved in mergers and acquisitions. This process is supported by tailored questionnaires and assessments undertaken by the Group's compliance functions, ensuring that human rights considerations are integrated into broader corporate decision-making.

Additionally, ANL relies on the CMA CGM Group's whistle-blower framework as a key grievance mechanism for identifying and addressing human rights risks and impacts. The Ethics & Compliance Helpline provides employees and third parties with a confidential and non-retaliatory channel to report concerns relating to the Group's operations or supply chain. Accessible 24/7 in multiple languages through a secure digital platform and dedicated phone lines, the system enables issues to be raised promptly and safely. Awareness of the Helpline is reinforced through internal policies, mandatory e-learning, and ongoing "Speak Up"



campaigns, which include seminars, internal communications, and visible signage across company sites.

E. Awareness Training

In 2025, the CMA CGM Group, as part of its global human rights program, issued an updated mandatory online training module for all employees to complete. The module, intended to be repeated annually, provides an overview of fundamental human rights principles, the types of risks that may arise in commercial and operational contexts, and the Group's expectations regarding vigilance and reporting. Interactive scenarios and knowledge-testing exercises are incorporated to reinforce understanding and support practical application in day-to-day roles.

At a regional level, ANL held a dedicated Anti-Modern Slavery Compliance Week, in the first week of December to align with the United Nations' International Day for the Abolition of Slavery. Throughout the week, ANL delivered three compulsory online training sessions focused specifically on modern slavery risks relevant to the maritime and logistics sectors. These sessions were conducted to ensure broad participation across ANL, its subsidiaries, and affiliated entities throughout the Oceania region. The program was complemented by a panel discussion featuring external experts from the Mission to Seafarers Victoria and the Australian Maritime Safety Authority, providing employees with insights from frontline organisations working directly with vulnerable seafarers.

ANL intends to deliver this program annually as part of its long-term commitment to building organisational capability in identifying and responding to modern slavery risks. By combining Group-wide compliance training with region-specific engagement from specialist external stakeholders, ANL is strengthening awareness across its workforce and embedding responsible practices throughout its operations.

To further advance its efforts—particularly in supporting vulnerable seafarers—ANL has, in 2026, been developing a partnership with the Mission to Seafarers Victoria. This collaboration aims to draw on the organisation's deep expertise in seafarer welfare and wellbeing, enhancing ANL's ability to address modern slavery risks through informed, community-based support.

5. ASSESSMENT OF EFFECTIVENESS OF ACTIONS TAKEN

A. Customer Feedback

Throughout 2025, the Group strengthened its approach to understanding customer expectations by expanding its global programme of regular satisfaction surveys. During the first half of the year, approximately 400,000 questionnaires were issued worldwide, generating more than 20,000 responses and resulting in the Group's highest Net Promoter Score (NPS) to date—an overall score of 44.2. Notably, the "Sustainability" category achieved an exceptional score of 84.2, reflecting increasing customer interest in environmentally responsible solutions.



In parallel, more than 1.3 million surveys relating specifically to customer-service interactions were distributed, yielding 89,000 responses. These ongoing feedback mechanisms provide valuable insights into customer expectations and help the Group identify priority areas for improvement, enabling continuous refinement of services and customer-experience initiatives.

B. Independent Assessment

CMA CGM reports on progress against its targets and goals, including for human rights issues, in its annual Sustainability Report and Duty of Vigilance Plan and, as a signatory to the United Nations Global Compact, in its annual “Communication on Progress”. All published key performance indicators are independently audited each year to ensure accuracy and transparency.

The CMA CGM Group undergoes annual sustainability evaluation through EcoVadis, a leading global sustainability rating agency. In 2025, the Group achieved a score of 80/100 based on CSR-related criteria. This improvement on last year’s already high score of 75 reflects the company’s continued efforts to strengthen its corporate social responsibility performance, including its human rights and modern slavery initiatives.

C. Regional Performance Monitoring

Within the Oceania region, ANL evaluates its human rights protection effectiveness, including modern slavery prevention measures, primarily through its dedicated Anti-Modern Slavery Committee. This assessment process incorporates input from multiple operational domains including Sustainability, Human Resources, Operations, Global Accounts, and the executive leadership.

Performance metrics encompass Third-Party Code of Conduct adoption rates and the successful integration of Ethics & Compliance provisions within external contractual frameworks. Significantly, ANL has achieved incorporation of such provisions in approximately 90-95% of its contractual arrangements, demonstrating substantial third party compliance commitments.

6. CONSULTATION WITH OTHER REPORTING ENTITIES

As part of the consultation process, the General Managers of ANLS, ANL Timor, ANL PNG and CCIS ANL Australia were provided with the draft 2025 Modern Slavery Statement and invited to provide feedback. Some entities provided valuable comments, which are reflected in this statement. As an outcome of this process, meetings are being planned for the second half of 2026 to support ongoing dialogue with these controlled entities on how to further strengthen their approach to identifying and addressing modern slavery risks within their respective operations.



7. CONCLUSION

ANL maintains a strict zero-tolerance stance toward all forms of modern slavery across its operations and supply chains. This commitment is embedded in the organisation's governance framework and is reinforced through practical measures, including mandatory employee training, contractual human-rights obligations for suppliers, and ongoing monitoring and escalation processes designed to identify and address potential risks.

Looking ahead, ANL is committed to continually strengthening the systems, processes, and controls that underpin its approach to modern slavery and broader human rights due diligence. The organisation will continue to leverage its operational footprint, commercial influence, and industry partnerships to promote responsible practices and contribute to meaningful, sector-wide progress.

This Statement was approved by the Board of Directors of ANL Container Line Pty Ltd on 29 June 2026 | 02:11 CEST and is signed on its behalf by a member of the Board.

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Sanjeev Jhanjee
 Director
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