



ANL

MODERN SLAVERY STATEMENT

ANL CONTAINER LINE PTY LTD

Reporting Period 1 January to 31 December 2024

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



TABLE OF CONTENTS

1. INTRODUCTION 2

2. ANL’S BUSINESS STRUCTURE 2

3. IDENTIFYING POTENTIAL RISKS IN OPERATIONS AND SUPPLY CHAINS 3

4. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY 5

5. ASSESSMENT OF EFFECTIVENESS ON ACTIONS TAKEN 7

6. CONCLUSION 8



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 2024**, for and on behalf of itself and its subsidiaries.

Although an Australia registered company, ANL is ultimately owned by CMA CGM S.A. (**CMA CGM**) based in Marseille, France. CMA CGM is the parent company of the CMA CGM group companies (**CMA CGM Group**), which is a global leader in integrated container transportation and logistics services.

As a principal subsidiary of the CMA CGM Group within the Oceania region, ANL operates under the comprehensive corporate social responsibility (**CSR**) and compliance frameworks established by the parent organisation. This includes adherence to standardised business ethics and compliance protocols implemented across CMA CGM's global operations and supply chain networks, ensuring consistency in approach across Australian and international markets.

Since 2017, CMA CGM has operated under France's Duty of Vigilance legislation, mandating systematic management of human rights and environmental risks across the organisation, its subsidiaries, and supplier networks. This regulatory requirement necessitates annual publication of a Vigilance Plan, providing transparent reporting on risk management activities and outcomes.

At the regional level, ANL's executive management operates from Melbourne headquarters under the leadership of Chief Executive Officer Shane Walden. 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 STRUCTURE

Founded by the Australian government in 1956 and acquired by the CMA CGM Group in 1998, ANL operates as Australia's largest ocean shipping container carrier. The company's core business is containerised shipping services across Intra-Oceania, Asia-Oceania, and North America trade routes.

ANL's operations span three primary business sectors: container shipping, container depots, and shipping agency services. The company operates through several 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's operations are supported by a network of established third-party suppliers providing essential services across terminal operations, road and rail transport, fuel supply, ship brokerage, and maritime insurance. These supplier partnerships are strategically aligned with ANL's shipping services, which maintain a concentrated presence throughout Asia, Pacific Island nations, and the Oceania region, with additional service routes extending to and from the United States.

ANL also partners with general business suppliers for IT equipment, office supplies, cleaning services, and travel services to support its Australian operations. In alignment with its Reconciliation Action Plan, ANL prioritises engagement with Indigenous suppliers wherever feasible.



3. IDENTIFYING POTENTIAL RISKS IN OPERATIONS AND SUPPLY CHAINS

- CMA CGM Group Level

The CMA CGM Group initiated a new risk mapping project in 2024 to assess risks across the Group's own operations and supply chain in the areas of human rights, health & safety and the environment, in accordance with duty of vigilance requirements. This mapping, based on industry analyses, internal documents and multi-stakeholder consultations, and due to be completed in 2025, will inform the CMA CGM Group's 2025 Vigilance Plan.

Furthermore, late 2023, saw the completion of a Human Rights Impact Assessment commissioned by the Group to identify the most salient human rights risks associated with both its own operations and supply chain. The "gross" risk results (prior to considering existing mitigation measures) were ranked in the following order for salience:

Group Operations (in order of priority):

1. Occupational Health and Safety
2. Working Hours
3. Grievance Mechanism and Access to Remedy
4. Discrimination and Equal Opportunities
5. Workplace Violence and Harassment
6. Wages and Benefits
7. Health & Livelihood of Local Communities
8. Freedom of Association and Collective Bargaining
9. Forced Labour and Human Trafficking
10. Land Acquisition and Indigenous Rights

Supply Chain (in order of priority):

1. Occupational Health and Safety
2. Working Hours
3. Grievance Mechanism and Access to Remedy
4. Discrimination and Equal Opportunities
5. Wages and Benefits
6. Workplace Violence and Harassment
7. Health and Livelihood of Local Communities
8. Freedom of Association and Collective Bargaining
9. Forced Labour and Human Trafficking

The aforementioned risk mapping and risk assessment are helping determine the actions taken by the Group to prevent and mitigate human rights risks including in the area of modern slavery.

- ANL Level

A. Onshore Operations Risk in Australia and Singapore

ANL assesses modern slavery risks within its onshore operations in Australia and Singapore as extremely low, based on several key factors: compliance with applicable Australian and Singaporean employment legislations, established employment arrangements for ANL's workforce, comprehensive



annual employee training programs, and implementation of a robust policy framework aligned with CMA CGM Group standards.

Despite this low-risk assessment, ANL recognises the importance of maintaining employee awareness regarding modern slavery and human rights considerations, both within their operational roles and throughout supply chain interactions. To ensure a good understanding across the organisation, ANL implements targeted communication strategies including company-wide modern slavery awareness training.

B. Maritime Operation Risk

As an industry leader in the Oceania region, ANL recognises the potential modern slavery risks affecting seafarers within the maritime industry, as documented in reviews and reports by various organisations, including the UN Global Compact, Maritime Union of Australia¹ and the Mission to Seafarers². The geographical isolation inherent to maritime operations and limited visibility of working conditions aboard vessels are identified as primary factors contributing to seafarer vulnerability to labour exploitation. These risks were further exacerbated during the COVID-19 pandemic, prompting the Neptune Declaration on Seafarer Wellbeing and Crew Change, to which CMA CGM Group is a signatory.

The majority of the vessels in ANL's fleet (both ANL and ANLS) are chartered vessels. As a vessel charterer ANL is not directly responsible for crew management on its chartered vessels, with crew management responsibilities falling under the scope of vessel owners and their crew managers rather than ANL as the charterer. However, ANL implements specific measures to mitigate modern slavery risks for seafarers:

- Vessel provision for ANL operations is managed through CMA CGM Head Office's vetted network of premium shipowners. This pool comprises first-class shipowners operating under International Transport Workers' Federation (ITF) standards, with rigorous oversight of crew working conditions, hours, and operational standards.
- Vessel chartering contracts include specific provisions mandating compliance with ethics and human rights standards, establishing contractual obligations for vessel providers to maintain appropriate working conditions for crew members, with non-compliance constituting contractual breach.

C. Country Risk

As part of its strategic focus within the Oceania region, ANL provides shipping services to numerous Pacific Island countries, supported by subsidiary agencies and locally based third-party agency service suppliers. ANL acknowledges that regional political structures, economic development levels, and evolving social frameworks in certain Pacific Island countries may present elevated modern slavery risks in jurisdictions where ANL maintains business operations. However, to counter such risks ANL facilitates modern slavery awareness training for its staff, ensuring that its subsidiary companies must adhere to CMA CGM Group policies and standards in their operations.

¹ UN Global Compact (2022), Modern Slavery within Maritime Shipping Supply Chain Report, <https://unglobalcompact.org.au/wp-content/uploads/2022/12/Modern-Slavery-within-Maritime-Shipping-Supply-Chains.pdf>.

² The Mission to Seafarers (2023), Charting a Course Away from Modern Day Slavery, <https://www.missiontoseafarers.org/wp-content/uploads/theSea-issue-1-2023.pdf>.



4. ACTIONS TAKEN TO ADDRESS THE RISK OF MODERN SLAVERY

- CMA CGM Group Level

The CMA CGM Group is committed to conducting comprehensive human rights due diligence through a risk-based methodology applied across its operations and supply chain. This approach encompasses the systematic identification, prevention, mitigation, and remediation of adverse human rights risks and impacts, including modern slavery concerns. The 2024 risk mapping project as mentioned above exemplifies this commitment as does the roll-out in 2024 of a new Group-wide mandatory human rights e-learning, which raises awareness of the risk of human rights violations including modern slavery in a business context.

CMA CGM also has a sustainable procurement programme and, in 2024, it strengthened its sustainable procurement governance framework through the establishment of a Group Responsible Purchasing Committee, comprising senior management representatives from key procurement divisions to oversee responsible purchasing initiatives and decision-making processes.

Furthermore, CMA CGM maintained its membership in the United Nations Global Compact throughout 2024, actively supporting the advancement of the UN 2030 Sustainable Development Goals through participation in Global Compact working groups and submission of its annual Communication on Progress report under this framework.

- ANL Level

A. Policies on Modern Slavery and Human Trafficking

Aligning with CMA CGM's commitment to ensure that there are no human rights violations including modern slavery practices, ANL adheres strictly to the following set of Group policies that are continuously reviewed and updated:

(1) Code of Ethics

The Code of Ethics is applicable to all CMA CGM Group employees globally and requires a commitment to maintaining the highest level of business ethics, personal integrity and compliance across the business. All employees of ANL and its subsidiaries must strictly adhere to the Code. The Code of Ethics unequivocally condemns the direct or indirect use of forced labour and expressly condemns any form of modern slavery including slavery, servitude or human trafficking.

(2) Human Rights Policy

Created and validated in 2024, the Human Rights Policy applies to all employees and sets out CMA CGM's approach to human rights in detail. Listed in it are those human rights categories considered requiring the most focus given the nature of CMA CGM's activities, as well as the company's stance in respect of each one. Amongst these categories, is modern slavery, human trafficking and child labour, to which a zero-tolerance approach is taken.

(3) Third Party Code of Conduct

Externally, the Third-Party Code of Conduct is applicable to all CMA CGM Group's suppliers, subcontractors and business partners. It sets out the minimum ethical standards expected of them based on international standards and embeds a requirement of commitment to respect all internationally



recognised human rights standards including child labour and forced or involuntary labour and working conditions.

ANL incorporates the Group's Third-Party Code of Conduct in all service contracts with suppliers and service providers, ensuring such minimum non-negotiable ethical compliance being a contractual obligation on suppliers when contracting with ANL entities.

B. Risk Assessment Process

(1) BvD 360 Risk Assessment

During 2024, ANL's Procurement division implemented the BvD 360 Risk Assessment system to enhance supplier risk management protocols for new business partnerships. This comprehensive evaluation framework, which is housed within the supplier assessment software used by the Group, encompasses three distinct assessment modules: Compliance, Financial, and Corporate Social Responsibility (CSR) evaluations. Each assessment module operates independently, applying specific criteria to generate targeted risk ratings across different operational domains.

This multi-dimensional approach provides ANL with granular risk intelligence, enabling more informed supplier selection decisions based on comprehensive risk profiles rather than single-point assessments. The system facilitates global supplier comparison through standardised metrics, improving procurement transparency and supporting evidence-based decision-making processes.

The BvD 360 implementation represents a strong advancement in ANL's supply chain due diligence capabilities, providing systematic risk mapping that enhances the organisation's ability to identify potential human rights vulnerabilities before establishing commercial relationships. This proactive approach strengthens ANL's overall risk management framework whilst supporting compliance with modern slavery legislation requirements.

The supplier assessment software also raises media alerts regarding suppliers including in the area of human rights (modern slavery included), thus further enhancing ANL's supply chain due diligence.

(2) Contractual Reviews by ANL Legal

All supplier and service contracts, along with other third-party agreements, undergo a structured two-stage review process. Initial assessment is conducted by ANL's Procurement team or relevant Vendor departments, followed by comprehensive legal review by the ANL Legal team in Melbourne, acting for ANL and its subsidiaries.

Where the CMA CGM Third Party Code of Conduct cannot be formally integrated into specific contracts due to operational constraints, the ANL Legal team implements alternative safeguards through bespoke Ethics and Compliance clauses tailored to the relevant agreement.

This systematic approach ensures universal coverage, guaranteeing that either the Third-Party Code of Conduct or equivalent Ethics and Compliance provisions form integral contractual obligations for all suppliers, subcontractors, and business partners. The process serves to help prevent human rights risks, including modern slavery concerns, throughout ANL's supply chain operations.

C. Awareness Training & Information Sessions

In 2024, ANL Legal delivered mandatory Anti-Modern Slavery compliance trainings across all Oceania operations, designed to enhance staff awareness and understanding of contemporary slavery issues. The training programme equipped personnel with essential knowledge regarding modern slavery risks



within both direct operations and supply chain networks, whilst ensuring clear comprehension of reporting obligations under the Modern Slavery Act.

Complementing this formal compliance training, the Oceania Sustainability team collaborated with Taldumande Youth Services (**Taldumande**) to deliver a specialised online presentation. Taldumande, a Sydney-based not-for-profit organisation, operates community-focused programmes specifically targeting modern slavery prevention across Australia. Their expertise particularly centres on combating forced marriage and other slavery-like practices that disproportionately affect children, young people, and young adults.

This dual approach—combining regulatory compliance education with specialist community expertise—reflects ANL's commitment to developing a comprehensive strategy.

D. “Whistle-blower” Procedures

The Group operates a comprehensive 24/7 Ethics and Compliance Helpline, accessible to both ANL employees and external stakeholders, including suppliers and subcontractors. This reporting mechanism facilitates the confidential disclosure of ethical concerns such as human rights violations, including modern slavery, whether occurring within ANL's direct operations or across its supply chain networks.

All reports submitted in good faith are protected under the Group's strict non-retaliation policy, ensuring reporter safety and encouraging transparent communication of actual or potential violations.

During 2024, no modern slavery violations were reported through the whistleblower system in relation to ANL's business.

5. ASSESSMENT OF EFFECTIVENESS ON ACTIONS TAKEN

A. Performance Measurement Framework

CMA CGM's CSR division has established a list of comprehensive key performance indicators (**KPIs**) to evaluate broadly CSR effectiveness throughout operational and supply chain activities. These metrics are systematically aligned with internationally recognised frameworks, including the UN Global Compact's foundational principles, the 17 Sustainable Development Goals, and Global Reporting Initiative (GRI) standards, ensuring robust global compliance parameters.

Each KPI incorporates specific targets and is subject to regular reporting through CMA CGM's senior governance structure. Quarterly performance assessments are conducted via CSR Network Committee forums, with findings escalated to the Board of Directors' Audit & Accounts Committee and the specialised Sustainability Committee for strategic oversight.

This governance architecture facilitates dynamic performance optimisation, triggering targeted corrective measures when performance gaps emerge between strategic objectives and operational outcomes. This approach ensures continuous improvement in CSR performance whilst maintaining accountability at the highest organisational levels.

B. Independent Assessment & Accreditation

The CMA CGM Group undergoes annual sustainability evaluation through EcoVadis, the recognised sustainability rating authority. In 2024, the Group achieved a rating of 75/100, demonstrating its commitment to CSR (including human rights) themes. EcoVadis performs its analysis using a multitude



of data from over 100,000 sources coming from external stakeholders (media, governments, trade unions, NGOs, and business networks). The aim is to collect positive and negative information on companies' performance regarding labour or procurement. If a case is significant – for instance involving a fine, sanction or conviction – the score for each theme is negatively impacted.

In addition, to ensure appropriate risk management, the Group implements several assessment procedures under international certification standards such as ISO 9001 (quality), ISO 45001 (health & safety) & SMC (Safety Management Certificate) for its activities. Audits as part of the certification renewals are used to identify the highest risks from a CSR point of view and to prioritise corrective actions.

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 strategic 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 compliance penetration.

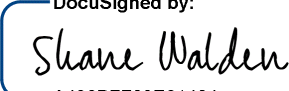
Additionally, ANL actively solicits feedback from employees, suppliers, and business partners as a complementary monitoring mechanism, enabling continuous refinement of its human rights protection strategies.

6. CONCLUSION

ANL operates under a strict zero-tolerance policy regarding any form of modern slavery across its business operations and supply chains. This position is enforced through concrete measures including mandatory staff training, contractual obligations for suppliers and active monitoring systems.

Our forward plan is to continuously improve our systems, processes, and procedures designed to combat modern slavery and address broader human rights challenges. ANL is committed to leveraging our market position, operational reach, and industry relationships to drive meaningful change.

This Statement was approved by the Board of directors of ANL Container Line Pty Ltd on **20 August 2025** and is hereby signed by a member of the Board.

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Shane Walden
 Managing Director
 ANL Container Line Pty Ltd