



ANL

**MODERN SLAVERY STATEMENT
ANL CONTAINER LINE PTY LTD**

Reporting Period 1 January to 31 December 2023



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1. INTRODUCTION

The Commonwealth *Modern Slavery Act 2018* (**Modern Slavery Act** or the **Act**) was passed by the Australian Parliament on 29 November 2018 and came into force on 1 January 2019. In accordance with the Act's provisions, this Modern Slavery Statement outlines the analysis and steps taken by ANL Container Line Pty Ltd (**ANL** as the reporting entity) for the year 1 January to 31 December 2023, for itself and on behalf of its fully owned subsidiaries, to prevent modern slavery risks in Australia and also its global business.

Whilst ANL is the reporting entity under the Act, it is important to note that ANL is ultimately owned by CMA CGM S.A. (**CMA CGM**), the world's third largest shipping company based in Marseille, France. ANL is an integral part of the global operations of the CMA CGM group of companies (**CMA CGM Group**), which has worldwide international maritime freight, air cargo transport, logistics and media business interests.

The CMA CGM Group's corporate social responsibility (**CSR**) strategies are defined at the highest level of the Group with the support of expert departments. They are implemented with a consistent and harmonised policy framework globally to maximise their effectiveness and efficiency. The CMA CGM Group is committed to operating in accordance with its ethical, social and environmental values with three core pillars making up its CSR strategies being: (1) Acting for the Planet; (2) Acting for People; and (3) Acting for Fair Trade.

As a family-owned business with strong values, the CMA CGM Group endeavours to guarantee respect for human rights and fundamental freedoms of all people, and to ensure the safety of and provide the best possible working conditions for its employees around the world. The CMA CGM Group is also focussed on its supply chains to ensure that its contractors, subcontractors and suppliers adhere to responsible human rights practices that are consistent with the CMA CGM Group's values and principles.

ANL, as a subsidiary member of the CMA CGM Group and the key ocean cargo carrier brand in Oceania, is guided by the strategies implemented by the CMA CGM Group globally. It follows and implements the business ethics and compliance policies and processes as implemented by the CMA CGM Group in its own business operations and supply chains in Australia.

ANL has its executive management team led by its CEO Mr Shane Walden that is headquartered in Australia. The ANL management team is responsible for ANL's business and operations strategies




implemented in the Oceania region, as well as for identifying, investigating, managing and mitigating ANL’s corporate risks and ensuring compliance, including its compliance with the Modern Slavery Act.

2. **ANL’S BUSINESS STRUCTURE**

Originally established by the Australian government in 1956, and later becoming part of the CMA CGM Group in 1998, ANL is the largest ocean shipping container carrier company based in Australia. It specialises in containerised shipping services for Intra-Oceania, Asia-Oceania and North America trades.

ANL also has several owned and controlled 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 OPERATIONS

<p>Maritime / Shipping</p> 	<p>Container shipping is ANL’s core business with ANL and ANLS operating either owned or chartered vessels. The shipping services also operate in consortiums with other international shipping lines to promote efficiency and productivity. As part of the shipping services ANL engages third party suppliers at each port of call for stevedoring and pilotage services.</p>
<p>Container Depots</p> 	<p>ANL repairs and manages its extensive container fleet through a fully owned container park in Melbourne, Australia – CCIS ANL Australia. ANL also utilises depot services provided by third-party container depot providers at various ports of call.</p>
<p>Shipping Agencies</p> 	<p>ANL relies on a global network of CMA CGM owned agencies as well as two subsidiary agencies owned by ANL - ANL Timor in Timor Leste, and ANL PNG in Papua New Guinea. ANL also engages with a small number of third-party agencies in some Pacific Islands countries.</p>

When engaging third party suppliers ANL and its subsidiary companies undertake a vigorous contractual negotiation process with a view to creating long-standing supplier arrangements and managing such relationships via service contracts. Such contractual arrangements also incorporate

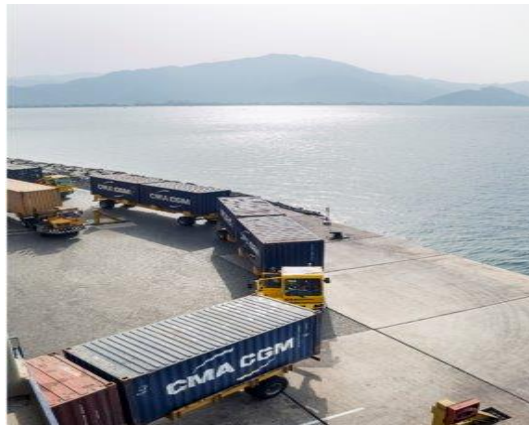


performance management measures such as KPIs for agency agreements or service level agreements for terminal service agreements.

ANL also engages general business suppliers, including for the provision of IT equipment, office supplies, cleaning services and travel and entertainment services as part of its support functions in Australia. Where possible ANL also looks to engage the services of indigenous suppliers, in accordance with its commitment to the ANL Reconciliation Action Plan.

2023 Operations Summary - ANL

21 Trades	Australian Offices 7	1,113,000 Containers moved in 2023
331 Ports of call	141,644 TEUs of fleet capacity	37 Vessels in operation





3. IDENTIFYING POTENTIAL RISKS IN OPERATIONS AND SUPPLY CHAINS

- **CMA CGM Head Office Level**

ANL's parent company, CMA CGM, is subject to the French corporate Duty of Vigilance Law introduced in 2017. This French legislation requires large companies in France to effectively manage their human rights, health and safety and environmental risks – both in the company's own operations, and also in the operations of its subsidiaries, subcontractors and suppliers. Under this legal requirement the CMA CGM Group aims to assess its risk profile in this key area accordingly and conducts an annual CSR risk mapping process, with respect for human rights being a key risk factor in the assessment.

- **ANL Level**

ANL considers that modern slavery risks may be present in some parts of its operations and supply chains including the following categories:

- **Maritime Operation Risks:**

The majority of the vessels in ANL's fleet (both ANL and ANLS) are chartered vessels. As primarily a vessel charterer ANL is not directly responsible for crew management on its chartered vessels. Such responsibility falls under the scope of vessel owners and their crew managers.

Despite this, ANL is fully aware of the potential risks of modern slavery practices among crew members employed on its chartered vessels. For example, as noted in the recent review undertaken by the United Nations Global Compact, in partnership with the Maritime Union of Australia (**MUA**),¹ the vulnerability of seafarers to labour exploitation is clear in light of the inherent physical and geographical remoteness of shipping, which decreases the visibility of working conditions.

Examples of modern slavery practices concerning seafarers may include: vessel owners and/or crew managers withholding crew pay, restrictions on crew movement, and mistreatment of crews. Furthermore, the COVID-19 pandemic exacerbated the modern slavery risks for seafarers on board

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>.



vessels globally due to the severe restrictions adopted by numerous countries to limit crew movements ashore and also constrain crew changeovers at the end of their employment engagement.

In both its 2021 and 2022 Modern Slavery Statements ANL reported on the specific measures adopted by the CMA CGM Group (including ANL) to counter the challenges to facilitate crew change throughout the COVID-19 pandemic. The CMA CGM Group is also a signatory to the Neptune Declaration on Seafarer Wellbeing and Crew Change.

Although no specific instances of modern slavery have been identified or reported through the Group's whistle-blower system during the last year, ANL is in the process of scoping its specific processes and strategies that will further ensure satisfactory crew working conditions on all ANL chartered vessels.

- **Geographic Risk:**

As a key business strategy in the Oceania region, ANL provides various shipping services to a number of Pacific Island countries, along with support from its subsidiary agencies and locally based third party agency services suppliers.

ANL's subsidiary companies must strictly follow the CMA CGM Group's policies and standards in their own operations and also when contracting with third-party suppliers. Despite this internal requirement ANL considers that due to regional political structures, economic developments and changing social frameworks in some Pacific Island countries there may be a higher risk of modern slavery practices in some Pacific Island countries where ANL currently has business operations.



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

- The CMA CGM Group Level

At the highest level the CMA CGM Group is committed to respecting human rights and fundamental freedoms. As already noted in this Statement, human rights consideration is mandatory under French Law which governs CMA CGM's business operations. Beyond the legal framework; however, respecting human rights and fundamental freedoms is also reflected in two of the Group's three key sustainability pillars – Acting for People and Acting for Fair Trade.

Further, the CMA CGM Group Code of Ethics which applies globally to all Group companies - including ANL - underpins the Group's commitment to maintaining the highest level of business ethics, personal integrity and compliance. At its core the CMA CGM Group honours and safeguards the fundamental principles as laid out in the United Nations Universal Declaration of Human Rights.

Within the Group's supply chain system every supplier, subcontractor or business partner is requested to respect internationally recognized human rights standards, as evidenced by the CMA CGM Third-Party Code of Conduct. All suppliers, subcontractors and business partners of the Group are requested to sign up to this Code prior to the start of any business or contractual relationship with any Group company.



In 2023 the CMA CGM Group continued to be proactive in its ongoing commitment for ensuring respect for human rights in its own operations and supply chains. Examples of this include:

- Commissioning a global sustainable business consultancy to conduct a human rights assessment across the Group (**Human Rights Assessment**). The assessment highlighted, amongst other things, actual and potential key human rights impacts (including regarding modern slavery) in the Group's own business and supply chains as well as recommendations as to how the Group could enhance its approach to human rights. The Human Rights Assessment is helping orientate human rights due diligence efforts across the Group.
- Engaging a CMA CGM Group Human Rights Officer based in the Group's Head Office Compliance Department. This officer is responsible for preparing a roadmap for implementing the Human Rights Assessment recommendations and for monitoring compliance with all relevant human rights laws and frameworks applicable to companies within the Group – including ANL.
- Strengthening the due diligence framework (including as regards human rights), which CMA CGM conducts on its suppliers, subcontractors and business partners. This is achieved through a newly introduced third party sustainability assessment software package as part of the Group's Sustainable Procurement Programme.
- Enhancing the Group's global "whistle-blower" reporting system.
- Maintaining its membership of the United Nations Global Compact, which includes the group participating in Global Compact working groups and presenting its annual "Communication on Progress" under this initiative.

- **ANL Regional Level**

A. Policies



As an integral part of the CMA CGM Group's operations in the Oceania region, ANL follows the Group policies and processes as regards human rights (including modern slavery) in its operations and supply chains.

(1) Code of Ethics

As noted above, the Code of Ethics is one of the cornerstones of the CMA CGM Group's commitment to maintaining the highest level of business ethics, personal integrity and compliance across its



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, including but not limited to child labour, and condemns any form of modern slavery including slavery, servitude or human trafficking.

To this end ANL strives to maintain the highest standards of employee behaviour when representing ANL and the CMA CGM Group. ANL also follows the CMA CGM Group CSR approach in line with the 17 UN Global Compact SDGs to assess its position in relation to the UN programme.

(2) Third Party Code of Conduct

The Third-Party Code of Conduct defines the business conduct that the CMA CGM Group expects of its suppliers, subcontractors and business partners. It is based on international standards in the areas of human rights (including child labour and forced or involuntary labour), health and safety, compensation, working conditions, environment and anti-corruption.

Whenever engaging a potential new third-party supplier, subcontractor or business partner, ANL provides the Third-Party Code of Conduct to them for review and execution. ANL expects any suppliers, subcontractors and business partners that wish to work with ANL to be qualified and to comply with the Group's Third-Party Code of Conduct. This is an important part of the contractual negotiations between ANL and its suppliers, subcontractors and business partners.

(3) Compliance Check

When engaging with potential third-party suppliers, subcontractors or business partners, a specific compliance check is conducted by the Group's Compliance team to ensure that ANL enters into business relationships with companies upholding a standard of ethics similar to those adhered to by the CMA CGM Group.

B. "Whistle-blower" Procedures



The Group has established a 24 / 7 Ethics and Compliance Helpline that has been available to ANL employees and third parties such as suppliers and subcontractors since 2019. This facility enables the reporting of any concerns by anyone within or outside ANL involving human rights issues including modern slavery either within ANL's business operations or in its supply chains.

All reporting, when done in good faith, is covered by a non-retaliation policy.



In 2023 no significant violations concerning modern slavery were reported through this whistle-blower system for Australia.

C. Contractual Reviews by Oceania Legal



All supplier and service contracts, or any other agreements with third parties, must be reviewed first by the Procurement team or the Vendor departments within ANL, and then further reviewed by the Oceania Legal team based in Melbourne for and on behalf of ANL or its subsidiaries.

On the rare occasion when the CMA CGM Third Party Code of Conduct cannot be formally incorporated into applicable contracts for various reasons, the Oceania Legal team will look to ensure that stand-alone Ethics and Compliance clauses are inserted in the relevant contract instead.

This process ensures that either the Third-Party Code of Conduct or the Ethics and Compliance clauses are incorporated in all agreements as part of the contractual obligations of suppliers, subcontractors or other business partners. This process assists ANL in managing human rights (including modern slavery) risks in its supply chains.

D. ANL's Anti-Modern Slavery Committee



Following the establishment of the ANL Anti-Modern Slavery Committee in 2021, the members of the Committee have continued to be consulted throughout 2023 to discuss potential risks of modern slavery involving ANL's suppliers, sub-contractors and business partners.

ANL currently has representatives from the following departments on the Anti-Modern Slavery Committee: Legal, Human Resources, Operations, Procurement, Sustainability, Sales, Strategic Global Accounts and Transformation.

ANL also regularly receives modern slavery queries from its customers about its business operations. These "outside in" perspectives allow ANL to consider how it can further develop its responses to potential modern slavery risks in its business operations.

E. Training & Sponsorship





During 2023 ANL arranged a specific modern slavery training programme – “A Practical Guide to the Modern Slavery Act” run by Anti-Slavery Australia. This is a dedicated centre within the Faculty of Law at the University of Technology, Sydney. This training is designed for company executives, managers, lawyers and any organisations wanting to increase awareness amongst their staff of modern slavery.

Selected staff, including the members of the Anti-Modern Slavery Committee, and mid to senior managers within ANL were provided with the opportunity to complete the training to gain a deeper understanding of modern slavery risks and the regulatory framework in Australia.

In addition, ANL’s Sustainability Department provided US\$10,000 of funding to support Taldumande Youth Services. This is a not-for-profit organisation based in Australia that has a key focus on combating modern slavery in Australia especially on the issue of forced marriage. ANL is currently in talks with Taldumande to engage its services and resources for a programme to be run in 2024 with the goal of educating its staff with more training on the multifaceted issue of modern slavery.

5. ASSESSMENT OF EFFECTIVENESS ON ACTIONS TAKEN

- The CMA CGM Group Level

At the CMA CGM Group governance level the Group is committed to establishing key performance indicators (KPIs) to assess the effectiveness of actions put in place regarding human rights, and to creating a level of high transparency to enable responsible departments to monitor actions taken and make adjustments if necessary.

- ANL Regional Level

ANL reviews the effectiveness of its approach to combating human rights (including modern slavery) violations principally through its Anti-Modern Slavery Committee. It also relies on input from various key areas such as Sustainability, HR, Operational, Global Accounts and senior management. Indicators include the rate of acceptance of the Third-Party Code of Conduct or the Ethics Compliance clauses inserted in external contractual arrangements. Notably, most of ANL’s contracts (between 90% - 95%) have incorporated such clauses as a contractual obligation.

Furthermore, ANL values any feedback received from employees, suppliers and other business partners as an additional way of monitoring and improving its approach.

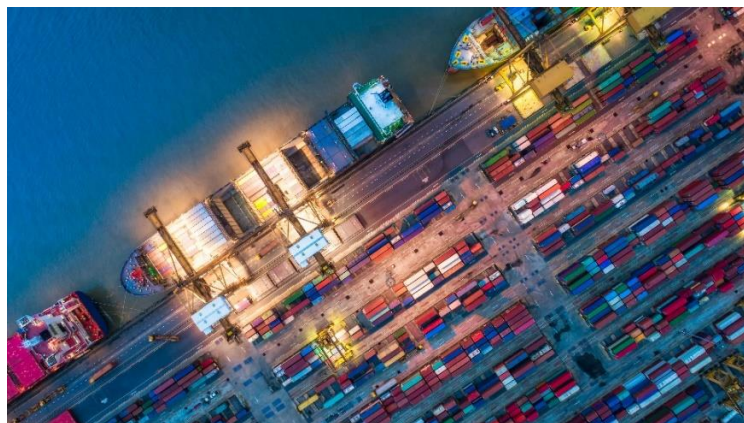
- External Assessment and Certification Procedures



The CMA CGM Group, of which ANL is an integral part, is assessed by the sustainability rating agency EcoVadis annually. In 2023 the Group scored 75/100, placing it in the top 3% of companies with the best ratings. This rating demonstrates the CMA CGM Group's 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, the environment and sustainable procurement.

Also in 2023 CMA CGM obtained the French National Responsible Purchasing and Supplier Relations (RFAR) certification, confirming the incorporation of sustainability criteria in its supplier qualification process as well as the training provided to its procurement teams on ethical issues.

To ensure appropriate risk management the Group implements several assessment procedures under International Certification Standards such as ISO 9001 (quality), ISO 14001 (environment), ISO 45001 (health & safety) and 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 prioritize the Group's corrective actions.




6. CONCLUSION

At its core, ANL has zero-tolerance for any form of modern slavery in its business operations and supply chains. Looking ahead ANL is firmly committed to further developing its systems, processes and procedures in relation to combatting modern slavery and other human rights related issues to set an example as a responsible corporate citizen in Australia and its global business operations.



For 2024 ANL is currently in the process of implementing several new processes and projects that will further enhance its management of human rights (including modern slavery) risks both in its business and in its supply chains. ANL looks forward to reporting on such new developments in its 2024 Modern Slavery Statement.

This Statement was approved by the Board of directors of ANL Container Line Pty Ltd on _____ **June 2024** and is hereby signed by a member of the Board.

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Shane Walden
Managing Director
ANL Container Line Pty Ltd