



ANL

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

Reporting Period 1 January to 31 December 2022



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INTRODUCTION

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by ANL Container Line Pty Ltd (**ANL**), headquartered in Melbourne, Australia for the financial year 1 January to 31 December 2022, for itself and on behalf of its fully owned subsidiaries.

ANL is ultimately owned by the French shipping line - 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.

Within the CMA CGM Group, policies, strategies and actions are centralised and harmonised for effective and aligned implementation globally and regionally. CMA CGM Group is committed to operating in accordance with its ethical, social and environmental values and to implementing suitable actions accordingly. It endeavours to guarantee the respect for human rights and fundamental freedoms, the health and safety of people, and the environment in all its activities and those of its subcontractors and suppliers.

CMA CGM Group expects its subcontractors and suppliers to adhere to responsible human rights practices that are consistent with the CMA CGM Group' values and principles.

To achieve this, ANL follows and implements the business ethics, compliance policies and process as implemented by the CMA CGM Group in ANL's own business operations and supply chain.

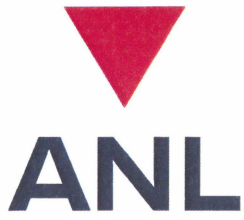
STRUCTURE AND OPERATIONS

ANL is the largest ocean shipping container carrier based in Australia.

Today ANL and its fully owned subsidiary ANL Singapore Pte Ltd have 36 vessels in operation. ANL offers 21 direct services and connections to 420 ports via the CMA CGM Group network. The scope of ANL's operations consists of:

Maritime / Shipping: Liner container shipping is ANL's core business with growing expansion into intermodal, break-bulk and value-added services.

Container Park operations: ANL repairs and manages its extensive container fleet through a fully owned container park in Melbourne, Australia – CCIS ANL Australia Pty Ltd.



Shipping Agencies: To support ANL's shipping services in the Oceania region ANL relies on a number of CMA CGM owned agencies as well as two subsidiary agencies owned by ANL - ANL Timor Unipessoal Lda in Timor Leste, and ANL Agencies PNG Limited in Papua New Guinea.



BUISS ORGANIZATION, STRUCTURE AND SUPPLY CHAIN

CMA CGM Group Level

Establishing sustainable relationships with our suppliers is a major priority for ANL. In this respect ANL is guided by the development of various strategies implemented by the CMA CGM Group globally.

The CMA CGM Group is a global leader in maritime transport and logistics, operating worldwide with an integrated approach. It is present throughout the logistics chain and operates in maritime freight, air freight, road and rail freight and freight forwarding, as well as in infrastructure with port operations, terminals and depots, and containers logistics.

The CMA CGM Group has operations in 160 countries and employs more than 150,000 people, and is headquartered in Marseille, France.

In 2021, the CMA CGM Group established an integrated and transversal governance for corporate social responsibility (CSR) issues from a global perspective. The Group CSR Committee is chaired at the top-level by Rodolphe SAADÉ.

The CMA CGM Group's CSR strategy is based on a collaborative approach and prioritises consultation on its CSR issues and goals, in particular some initiatives with the following stakeholders include:

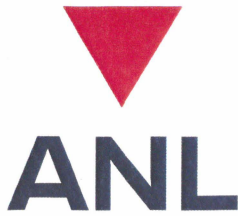
- **employees and employee representatives:** regular information on CSR actions provided through various internal communication channels (intranet, breaking news, webinars), local initiatives with the global CSR network, annual engagement campaigns;
- **customers:** customer desk dedicated to CSR and CSR sessions held during business reviews with major customers to discern their expectations;
- **suppliers:** CSR sessions during business reviews with key suppliers, who are essential participants in the Group's global transition to a more sustainable model;
- **investors and financial and non-financial rating agencies:** regular meetings held to present the Group's CSR strategy, questionnaires completed;
- **partners:** participation in meetings of professional networks or with partners;
- **academic world:** contribution to academic chairs;



- **NGOs and non-profit organisations:** bilateral dialogue or scientific collaboration with NGOs interested in the Group's CSR priorities, media watch.

Considering the expectations of its stakeholders, the CMA CGM Group has identified and validated 12 areas for its actions. Amongst them, ensuring respect for human rights throughout the value chain has been selected as a priority.

In practice, in order to guarantee respect for human rights, the CMA CGM Group continuously strengthens its vigilance and acts to advance each of the five pillars: risk mapping, policies and procedures, regular risk assessments, actions implemented, alert mechanism, and monitoring measures and their effectiveness.



Potential risks in Operations and Supply Chains

Marine and Port Operations risk assessment:

ANL charters vessels for its commercial ocean carriage operations. Therefore, ANL is not directly responsible for crew management on its chartered vessels; this being the responsibility of the vessel owners and its crew managers. ANL does; however, only work with reputable ship owners and ship brokers in our industry, and we only engage with vessel owners who are of good standing.

During 2022 one of ANL's subsidiaries purchased four ocean container vessels and has engaged specialised third-party companies to supply and manage the crews on board its owned vessels. We recognize that this imposes upon us a responsibility to monitor the crews and operations of our owned vessels to ensure that there are no modern slavery practices occurring on any of the owned vessels. This potential risk will be one of the main areas of focus for our Modern Slavery actions and responses in the future.

Geographic potential risk assessment:

ANL endeavours to provide effective awareness-raising training across all of the business areas and geographic regions of our operations, so that our local staff are empowered to make sustainable procurement choices to the best of their abilities.

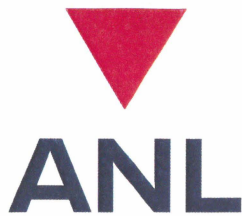
Focus areas of this Statement:

Each of these risks corresponds to a different department within ANL which creates another potential risk in that our modern slavery activities and responses may be fragmented and therefore less effective. Therefore, during this reporting period ANL has focused on bringing the responses to the various risks encountered by each ANL department together to ensure a cohesive, appropriate, and effective response to the risks of modern slavery.

These risks in our business, operations and supply chains were considered in detail in 2020 and 2021 and are reflected in the Statements for those two reporting years. [ANL notes that the Statements for those two years were loaded to the Departments' website].

In planning our actions, we have focused the bulk of our activities on these areas in this Statement:

1. Our responses to modern slavery risks across multiple departments;



2. Geographic risk assessment;
3. ANL's acquisition of four vessels; and
4. Additional Actions

ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

ANL continues to implement actions taken in previous years to address existing risks of Modern Slavery in our business and supply chains. These previous Statements are published on the ABF's website and can be read in conjunction with this Statement.

The below focuses on ANL's key new actions for the reporting period 01 January – 31 December 2022.

Bringing ANL's Modern Slavery Response together Across Multiple Departments

ANL's Anti-Modern Slavery Committee – Consultant Group Introduced:

In ANL's previous Modern Slavery Statements we noted our commitment to establishing, growing and maintaining an Anti-Modern Slavery Committee.

The Committee now spearheads ANL's action planning and responses to potential risks and is responsible for checking in with all ANL departments on a regular basis to assist their risk identification. For the 2022 reporting period we have added a "consultants" arm to the Committee. The Committee includes representation from Human Resources, Communications, Sustainability and Legal.

The new consultants arm of the Committee provides ANL with the opportunity to meet with all Heads of Departments across the ANL business on a regular basis. The frequency of these meetings is determined with reference to a pre-defined Modern Slavery Actions Timeline. The Committee monitors the Actions Timeline and communicates with each "consultant" responsible for that Action within each ANL Department. This approach allows ANL to hold individuals in each department accountable for the modern slavery actions that are assigned to them.

Throughout the course of 2022 two key meetings were held with all Department consultants to brainstorm new Modern Slavery Actions. These key brainstorming sessions were held separately to the normal meetings that are held with specific Departments to follow up actions in the timeline.

Actions Timeline:



As with previous years, the following departments are included in our Modern Slavery response.

1. Human Resources
2. Operations
3. Procurement
4. Communications
5. Sustainability
6. Strategic Global Accounts

The Modern Slavery Actions Timeline is a structured approach to our modern slavery response throughout the year, with defined deliverables. Some deliverables are due within the reporting period, and some will be ongoing. The main focus for the 2022 reporting period in relation to the Actions Timeline was to brainstorm, design and implement it as well as deliver on some of the initial actions. This has been achieved with the view to continuing to add to the timeline and to start achieving deliverables as they become due.

Specific Training Requirement – Planning:

With the introduction of the consultant's group, we have identified that it would assist our response and our actions brainstorming to have key members of the ANL business trained in modern slavery risks and practices. On this basis during the course of 2022 ANL worked with the training branch of our Human Resources department to identify a suitable training provider for targeted modern slavery training in 2023. The aim of this activity will be to train key members of the business and our legal department on modern slavery risks and responses should any risks be identified. The ANL Legal department will then hold training sessions during 2023 to provide modern slavery training to the wider ANL business.

Once the wider company training is completed then we plan to send out a Microsoft Forms questionnaire twice a year to invite ideas from ANL employees across Oceania on how we can improve our modern slavery response. Implementing this training plan, as developed in 2022, will be a key focus of our 2023 Statement.

We have identified that this training will address:

1. Potential modern slavery risks in the maritime industry;



2. Modern slavery risks in supply chains; and
3. How best to respond if evidence of modern slavery is identified.

Geographic risk assessment – ANL Timor and ANL Agencies PNG.

ANL had the first of its consultations with the General Managers of ANL Timor and ANL Agencies PNG on 30 November 2022. This consultation set out the expectations for the consultation process moving forward and provided ANL an opportunity to discuss the best approach to be adopted.

There will now be such meetings twice per year. The next scheduled consultation with ANL Timor and ANL Agencies PNG is on 26 June 2023. These consultations will allow the key managers in Timor – Leste and Papua New Guinea to contribute their Anti Modern Slavery response actions to ANL's Statements in the future. The key managers in these entities are included in the consultant's Anti Modern Slavery Action brainstorming sessions and will be important attendees to the 2023 training.

Vessel Acquisitions

The section of the Actions Timeline that deals with the vessel acquisitions is focused on the ANL Operations Department. The main focus with the ANL owned vessels is ensuring that there remains a zero-tolerance approach to any and all modern slavery practices occurring within ANL crews on board the vessels.

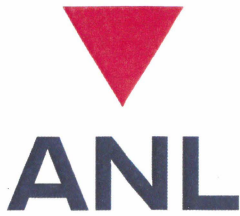
ANL now monitors the crews on board all of the ANL owned and chartered vessels by way of random auditing. We select a subset of eight or nine vessels, chosen from a list of both owned and chartered vessels, and extract the crew lists. Using these crew lists we check that the crew actual sign on date reveals an onboard duration of less than 11 months at sea and that an ITF Agreement is in place on the Vessel. These random crew sea-time samples are extracted by the ANL Operations team every two to three months.

Application of Group policies and procedures

The below are key actions as per the Group policies:

- (1) Code of Ethics

The Code of Ethics is the cornerstone of the CMA CGM Group's commitment to maintaining the highest levels of business ethics, personal integrity and compliance across its business. It defines the CMA



CGM Group's expectations for its collaborators' working relationships, customers, governments, public officials, business partners, suppliers, competitors, and the wider community. The Code of Ethics strongly condemns all forms of harassment, including but not limited to child labor and any form of modern slavery, including slavery, servitude, or human trafficking.

As stated in the CMA CGM Code of Ethics which applies to all the entities of the CMA CGM Group including ANL, we strive to treat all persons with dignity and mutual respect. ANL continues to follow the CMA CGM Group CSR approach in line with the 17 SDGs to assess its position in relation to the UN programme.

(2) Purchasing policy

The CMA CGM Group maintains a responsible purchasing policy called "The Way to Buy", applicable to all CMA CGM employees involved in any part of the procurement and supplier engagement process. The Way to Buy, which describes the fundamental principles of responsible purchasing and supplier relations, focuses on values, commitments, and rules of conduct such as sustainable purchasing best practices throughout the procurement process, the roles and responsibilities of the stakeholders in this purchasing process and the supplier qualification process.

In 2022 we commenced including our Modern Slavery statement in all bids and submissions made by Global Accounts. We have also added the ANL Modern Slavery Statement prominently on the ANL website.

(3) Third party code of conduct

The Third-Party Code of Conduct defines the minimum standards that the CMA CGM Group requires from its partners, in particular its suppliers and their employees and subcontractors. It applies to all of CMA CGM Group's contractual relationships, and its signature is a prerequisite for any partnership commitment.

In the same vein, ANL continues to employ a robust corporate governance system combined with policies and standards which are designed to provide a clear supply chain framework and are reflective of the core principles underlying our business ethics and integrity. We expect all suppliers that wish to work with ANL to be qualified and to comply with our Third-Party Code of Conduct, which applies to all contractual relationships between ANL and its business partners.



(4) Speak up policy

Our speak up system enables any person acting in good faith within or outside CMA CGM to report, in a secure and confidential manner, any suspected misconducts or violations of human rights in our operations or business relationships. It is available worldwide, 24/7, in more than 300 languages via a call-centre and in 54 languages via web intake. Concerns may include any human rights issues, including human trafficking and forced or involuntary labor, child labor, and actions harming any persons or their livelihood or properties, related to our operations, suppliers, subcontractors, third-party agents, and other business partners with a direct link to CMA CGM. It also enables anyone who reports to remain anonymous if they wish, in accordance with applicable local law.



ASSESSMENT AND EFFECTIVENESS OF ACTIONS TAKEN

Within the CMA CGM Group (including ANL) actions have been implemented pertaining to:

- (1) Employment
- (2) Suppliers & subcontractors - Know Your Suppliers (**KYS**)
- (3) Customers – Know Your Customers (**KYC**)
- (4) Due diligence to identify business partners under economic sanctions for human violations
- (5) Supporting local communities
- (6) Training sessions – Awareness campaign

(1) Employment

In the CMA CGM Group, we see our employees as a driving force and we do our utmost to ensure their safety and provide them with the best possible working conditions.

Through active training and mobility policies, and by promoting diversity and well-being in the workplace, the CMA CGM Group endeavours to create the best conditions for employees' professional and personal development.

(2) Suppliers & Subcontractors KYS

In 2021, CMA CGM's Procurement Department launched the "Accelerate" Program aiming to accelerate suppliers' assessment and reinforce suppliers risk management, involving financial aspects, corruption, economic sanctions, and CSR.

To impact the entire value chain, the CMA CGM Group encourages its suppliers to draft a Code of Conduct or Code of Ethics for their own suppliers and subcontractors. In 2022, more than 14,800 suppliers, accounting for approximately 75% of the expenditure in the maritime business, were assessed.

(3) Customers KYC

The CMA CGM Group has extended the duty of vigilance to its entire value chain by including a KYC component. An alert feature has been added to its main business shipping IT system that will notify when customers have, according to our own knowledge or public information, been involved in



smuggling, counterfeiting, violation of anti-terrorism laws, human rights violations and failing to declare dangerous cargo among other things.

The different levels of risk are to be monitored. An alert that is classified as sensitive, highly sensitive or critical and may lead to a refusal of the transaction.

(4) Due diligence to identify business partners under economic sanctions for human violations

The CMA CGM Group conducts all its activities in compliance with the laws on economic sanctions and embargoes applicable to it.

The compliance program includes a set of dedicated policies and procedures relating to economic sanctions, which applies to all employees. The CMA CGM Group's approach in this area positions it as a partner of national and international authorities.

These controls allow CMA CGM to identify individuals and entities under sanction for human rights violations and abuses and take appropriate steps, thereby contributing to the fight against modern slavery and human trafficking.

(5) Supporting local communities

The CMA CGM Group contributes to the social and economic development of the countries where it does business.

Helping local communities, in emergency humanitarian situations, and providing local communities with education opportunities, are the cornerstones of the fight against modern slavery and human trafficking. Attending school and receiving education increases a child's chance of finding work and avoiding exploitation.

The initiatives, tailored as closely as possible to the needs of the local areas and communities, maximize the Group's positive local impact.

The CMA CGM Foundation, created in 2005 and chaired by Tanya Saadé Zeenny, also continues its work providing humanitarian aid and advancing its commitment to education for all. The CMA CGM Group has supported approximately 400 projects, and tens of thousands of children have benefitted from the work the CMA CGM Foundation does.

Some examples of projects in 2022 include:



- Exceptional mobilisation for Ukraine with 3 large-scale operations for the transport of over 2,000 tons of humanitarian aid;
- Ambitious new partnerships to combat food insecurity;
- Construction of a primary school in Ivory Coast to provide schooling for 200 children;
- Participation in 4 structuring educational project in France and Lebanon to fight against school dropout; and
- Le Phare social incubator: support for 10 projects in Marseille and the West Indies.

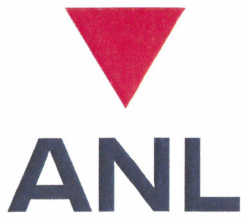
(6) Training sessions- Awareness campaign

The CMA CGM Group undertakes targeted programs to prevent, detect and remedy behaviours which violate the Code of Ethics, including provisions relating to human rights. All Group employees receive training on ethical issues, including preventing discrimination and harassment in the workplace. To raise the awareness and the understanding of the Group's procurement policy, a mandatory e-learning has been developed and addressed to the whole procurement community.

Employees in each procurement area have been trained to identify and set up corrective action plans with suppliers following questionnaire analysis. If further analysis is required, support is provided by the Group Procurement and other expert Departments (for example: Finance, Legal, CSR, Compliance).

These programmes will be enriched at the beginning of 2023 by a new specific training module focusing on responsible purchasing.

The CMA CGM Group conducted an extensive awareness campaign among the purchasing community and all stakeholders. The objective was to highlight the best practices and main challenges of sustainable purchasing by emphasizing the importance of ethical and responsible management in the development and maintenance of relationships with its suppliers.



MONITORING AND EVALUATION OF MEASURES TAKEN AT A CMA CGM GROUP LEVEL

To measure and to monitor the effectiveness of its actions, the CMA CGM Group has defined CSR indicators based notably on the UNGC's 10 principles, the 17 UN Sustainable Development Goals (SDGs) and the Global Reporting Initiative (GRI) criteria. These CSR indicators are updated annually.

In regards of Human Rights, the CMA CGM Group tracks KPI's such as workforce breakdowns by age and gender, share of employees with access to health cover, turnover rate, share of women in the Top 200, total of training hours, safety indicators and percentage of countries that have launched at least one local initiative, among other things.

More details on the CMA CGM Group's actions can be found on CMA CGM CSR Report.

In 2022, for the third consecutive year, the CMA CGM Group was awarded the ECOVADIS Platinum medal (awarded to the top 1% of all companies assessed on CSR-related criteria), rewarding the Group's CSR commitment and duty of vigilance actions.

To maintain this status, the CMA CGM Group has obtained various international certifications (ISO 9001, ISO 14001 and ISO 45001), accelerated the evaluation of its suppliers and strengthened supplier risk management through the Group's Accelerate program.

The CMA CGM Group is fully committed to maintaining the highest standards on business ethics, integrity and compliance in all its business activities and continuously developing its anti-modern slavery procedures and processes on an ongoing basis with a zero tolerance for any form of modern slavery.



CONCLUSION

This Modern Slavery Statement was prepared by the ANL Legal Department in consultation with ANL Management, Human Resources, Operations, Communications, Procurement, Strategic Global Accounts, Sustainability and key personnel from ANL's owned entities. ANL's owned entities all operate in largely the same sector of the transport industry so our actions and responses for all the entities ANL owns or controls are aligned.

ANL is committed to further developing its anti-modern slavery systems and procedures on an ongoing basis. ANL considers this a key requirement of its successful business operations into the future and it is fully committed to maintaining the highest standards of business ethics, personal integrity and compliance in all of our business activities. ANL has zero-tolerance for any form of modern slavery with any of its business operations, employment practices or supply chain partners.

This Statement was approved by the Board of directors of ANL Container Line Pty Ltd on 27 June 2023 and is hereby signed by a member of the Board.

Shane Walden
Managing Director
ANL Container Line Pty Ltd