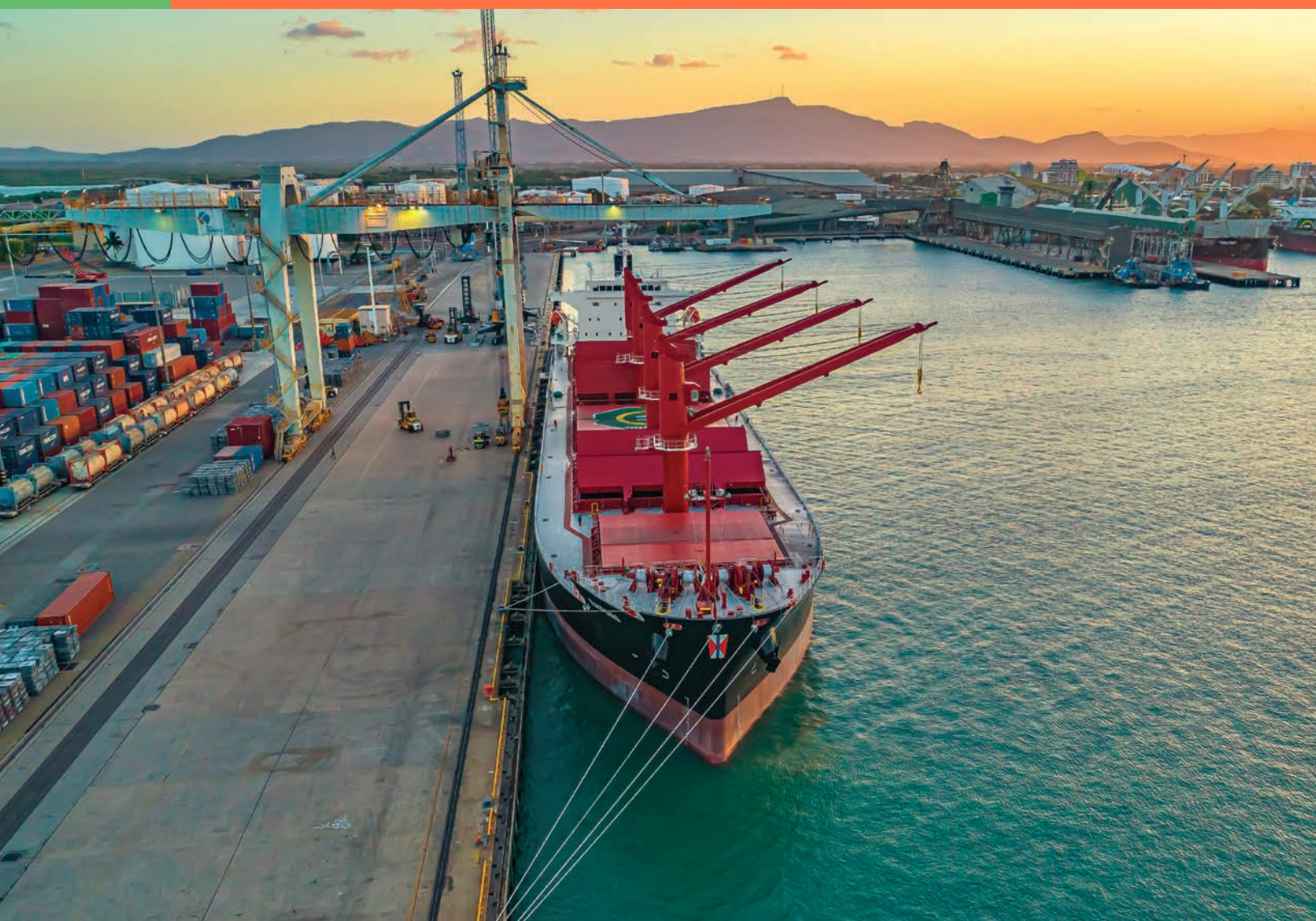
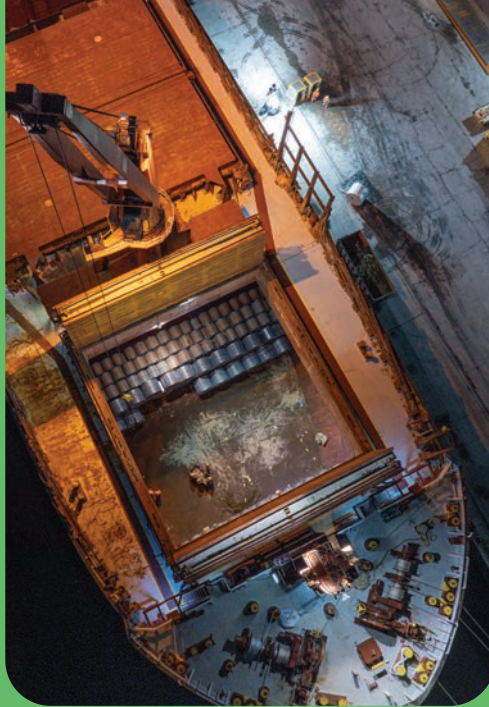


SUSTAINABILITY REPORT

FOR THE CALENDAR YEAR 2023





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About this Report

Feedback on any aspect of this report is welcomed.
Please contact Swire Bulk's Sustainability and Decarbonisation
Department at:

SD.dept@swirebulk.com

This is the third Swire Bulk annual Sustainability Report covering the period from 1st January through 31st December 2023.

The report provides a summary of material sustainability issues across Environmental, Social and Governance (ESG) areas together with the achievements and improvements made by Swire Bulk over the calendar year.

The report is written with reference to the Sustainability Accounting Standards Board (SASB) Standards and the report contains disclosures recommended in the Marine Transportation Sustainability Accounting Standards (Industry Standard, Version 2018-10) developed by SASB. The SASB disclosure index can be found in the Annex on page 44.

Please see the organisational boundary diagram in the Annex on page 50 for the scope covered by this report.

This report has undergone the limited external assurance against the Sustainability Disclosure Topics and Accounting Metrics of SASB's Marine Transportation Industry Standard. Please see the Annex on page 54 for the independent assurance statement.

CEO MESSAGE

2023 has been a pivotal year for our Company as we navigate the evolving maritime industry. Our unwavering commitment to sustainability and innovation drives us towards our ambitious targets. Reducing emissions is not just a goal; it is a shared vision with our shareholders. By setting and achieving these targets, we demonstrate our dedication to environmental stewardship and inspire innovation within our company and the industry. Our journey towards Net Zero emissions reflects our collective resolve to make a positive impact on the world, and we are excited to continue this journey with the support of all our stakeholders.

Last year, we set a Net Zero target for greenhouse gas (GHG) emissions by 2050 as part of our Decarbonisation Roadmap. This roadmap outlines the necessary actions and milestones, including an intermediary target of a 50% reduction in carbon intensity by 2030, from our baseline year of 2014. Additionally, we aim to either burn 2% of near zero emission fuels by 2027 or achieve an equivalent 2% reduction in absolute emissions through Energy Efficiency Technologies (EETs) and Measures. We are thrilled to announce that we have already achieved our 2027 target in 2023. These ambitious targets drive innovation within Swire Bulk and demonstrate our commitment to decarbonising our operations.

Our focus on fleet efficiency has never been more critical. We have made significant strides in optimising our operations to ensure peak performance. In 2023, we implemented advanced monitoring systems that provide real-time data on fuel consumption and emissions. These systems enable informed decisions that enhance efficiency, reduce our carbon footprint, and manage our operations to achieve environmental compliance. One of our key performance indicators is the Energy Efficiency Operational Indicator (EEOI), which measures the energy expended to move one unit of cargo over one nautical mile. This metric is crucial for encouraging more efficient vessel use. We are thrilled to report that our EEOI scores continue to lead in the dry bulk segment in our industry. We have consistently delivered market-leading EEOI scores in recent years, compared to our peers, thanks to the collaboration of our operations, commercial teams, and technical management.

Innovation is at the heart of our strategy. We are constantly exploring new technologies to enhance the performance of our operated vessels. Last year, we made a significant financial commitment to accelerate the adoption of the latest advancements that drive fuel efficiency and sustainability. Recognising that emissions from the chartered-in vessels contribute to our total GHG emissions, we are focusing on technologies applicable to both our owned vessels and chartered-in vessels. This holistic approach ensures we maximise our impact on reducing emissions throughout our entire operation. Our partnerships with technology providers and research institutions are vital in this endeavour. By collaborating with industry leaders, we stay at the forefront of technological innovation, ensuring our fleet remains competitive and environmentally responsible.

Maintaining a fleet of modern, fuel-efficient vessels is a fundamental aspect of our commitment to sustainability. We endeavour to sustain a low average age of our fleet, facilitated by our devoted Asset Management team. This proactive approach also involves the strategic disposal of older, less fuel-efficient vessels. Upholding these stringent standards is crucial to our success in achieving the lowest carbon intensity within the geared dry bulk sector.

This year marks the first time we have mapped our Scope 3 emissions, making us one of the few companies in the bulk shipping industry to do so. Scope 3 emissions include all indirect emissions in our value chain, such as those from purchased goods and services, upstream bunker fuel and business travel. By mapping these emissions, we gained a comprehensive understanding of our total GHG inventory and identified key focus areas.

Our commitment to diversity and inclusion in the workplace goes beyond ethical considerations; it is a strategic asset for our Company. With team members from 23 countries across six continents, our organisation thrives on the dynamic and innovative ideas that this mix of cultures and viewpoints brings. This diversity fosters unique problem-solving approaches and leads to strong business strategies. The significant representation of women in leadership roles further highlights our pledge to promote equal employment opportunities.

Our employees are our greatest asset, and their engagement is crucial to our success. We encourage our employees to participate in volunteering activities as part of our strategy to keep them engaged and motivated. These activities benefit the communities we serve and foster a sense of purpose and camaraderie amongst our team members. We have organised multiple activities to raise funds to provide better care for those who support smooth sailing operations and the global economy. Through partnerships with organisations like The Mission to Seafarers and Sailors' Society, Swire Bulk supports seafarers of all races, religions, and ranks worldwide. These organisations offer essential services at port drop-in centres and wellness programmes for seafarers and their families.

We are deeply committed to supporting our seafarers not just through charities but also with direct involvement. Our partnership with Endangered Species International engages seafarers in biodiversity conservation activities. These initiatives are essential in ensuring we have a skilled and dedicated workforce while contributing to the social and economic development of our key stakeholder communities.

As new environmental regulations come into force, we welcome the challenge and aspire to remain a market leader in sustainability. We are committed to promoting and fostering an environment where employees are happy and engaged, ensuring they continue to deliver excellent service to our customers. Together with our partners and employees, we are building a more sustainable future for maritime shipping.

Thank you for your continued support.

Peter Norborg
CEO, Swire Bulk



KEY PERFORMANCE HIGHLIGHTS

ENVIRONMENTAL

Climate-related Footprint

Emissions
Metric tonnes (t) CO₂e

*Out of total of electricity consumed, 21% came from renewable sources.

For more information, see page 17

Scope 1

y-o-y

1,227,465



1%

Scope 2

y-o-y

37*



-34%

Scope 3 (Air travel only)

y-o-y

745



37%

Scope 1 tCO₂e / vessel day

Operating days increased by **4% year-on-year (y-o-y)** yet Scope 1 emissions per day decreased.

2023

27.92

2022

28.73

EEOI* / 2023 Progress

*Energy Efficiency Operational Indicator (EEOI)
For definition see page 17

Reduced by **5.49% y-o-y**
10% ahead of emission reduction target

Annual EEOI Target
8.871

Actual EEOI Performance **8.002**

2023
Reduction

-28.6%

2030
Target

-50%

2014 Baseline

Total Number of Vessels

405

over the calendar year



y-o-y
31%

Average owned fleet age:

6.14 years

Emissions Reduction Savings

from Energy Efficiency Measures and Technologies:

2%

Based on emissions from consumed marine fossil fuels.

Ecological Impacts

No significant spills or releases to the environment

Reducing our Plastic Footprint

58%

y-o-y reduction of Single-Use Plastic Water Bottles on vessels.

95%

Overall reduction from the baseline (2018).

2018

2023

SOCIAL

Employee Health & Safety

Lost Time Injury Frequency Rate*

0.98 *per million manhours

0 Fatalities

Owned Vessels

Average RightShip Safety score

4.8 / 5.00



Shore-based Employees

Number:

137

Retention rate:

84.8%

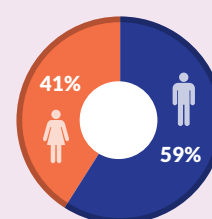
Nationalities:

23



Diversity & Inclusion By gender identity

Shore-based Employees



Female Senior Managers

2023
23%



2025 Target
30%

Female
Male

Community Support

Donations to charitable causes

USD 123,511

Hours volunteering

533

GOVERNANCE

Business Ethics / Grievances

8 reported / 7 substantiated and addressed.

100% of employees completed governance compliance training programme.

Maritime Anti-Corruption Network

Certificate of Membership
2023



ABOUT SWIRE BULK

Swire Bulk Pte. Ltd. is headquartered in Singapore, operating under the brand name of 'Swire Bulk'. This entity is a wholly-owned subsidiary of Swire Bulk Holdings Pte. Ltd., the vessel-owning company, which is in turn a wholly-owned subsidiary of Swire Marine Holdings Pte. Ltd., an investment holding company incorporated in Singapore.

Swire Marine Holdings Pte. Ltd. is a wholly-owned subsidiary of The China Navigation Company Limited, an investment holding company registered in London. None of these companies are publicly quoted on any stock exchange, and are ultimately owned by John Swire & Sons Ltd., based in London.

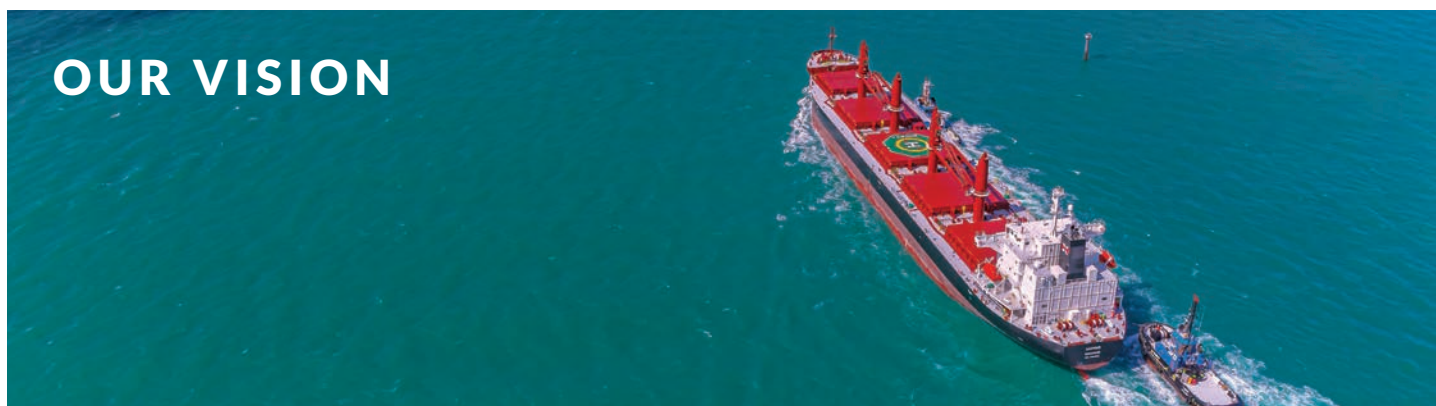
Vision, Mission and Values

Vision: Swire Bulk is committed to being an industry leader for safety and sustainability with a flexible trading approach as an Owner and Operator.

Mission: Swire Bulk's focus will always be on quality, and success will be defined by operating safely and delivering long-term value for the shareholders.

As an Owner, Swire Bulk will maintain a fleet of high-quality modern vessels and employ an agile asset-trading approach to exploit market cycles. As an Operator, Swire Bulk will create partnerships with first-class counterparties and deliver a premium service proposition. The Company's flexible trading approach will adapt to market volatility. Swire Bulk will retain and reward its people to deliver this strategy.

OUR VISION



Operating with
safety first



Setting the standard
on sustainability



Global coverage



Long-term,
customer-centric
partnerships



Bespoke freight
solutions

OUR VALUES



Integrity



Endeavour



Excellence



Continuity



Humility

Our Business

Swire Bulk, the specialist bulk trading arm of the multinational Swire Group, is a leading vessel Owner and Operator in the dry bulk geared sector with a trading fleet of over 130 Handysize and Supramax / Ultramax vessels controlled by six commercial offices around the world. Its global headquarters is situated in Singapore.

Swire Bulk operates one of the most modern and fuel-efficient fleets on the water. With a diversified cargo base and a balanced vessel operating mix between owned and chartered tonnage, Swire Bulk is well-placed to be a long-term partner of choice for its global customers and deliver market-leading, innovative and sustainable freight solutions.

Some of the industrial sectors Swire Bulk serves are:

Agriculture and fertilisers

Energy

Renewables

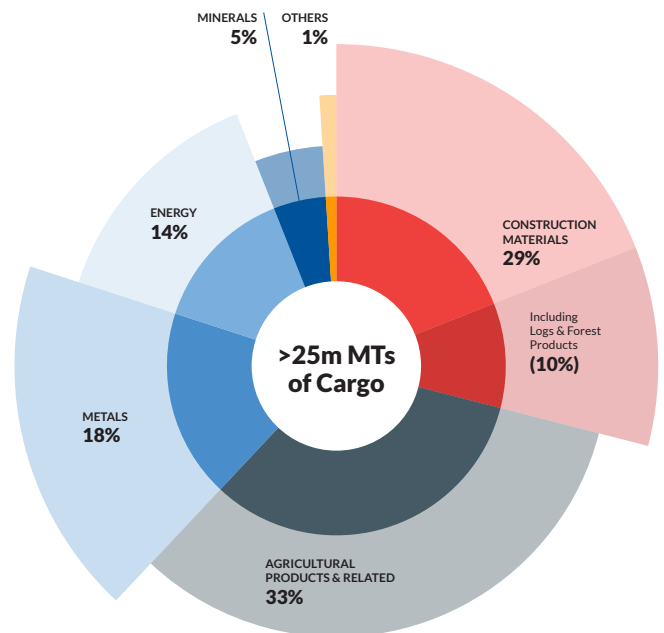
Mining

Steel

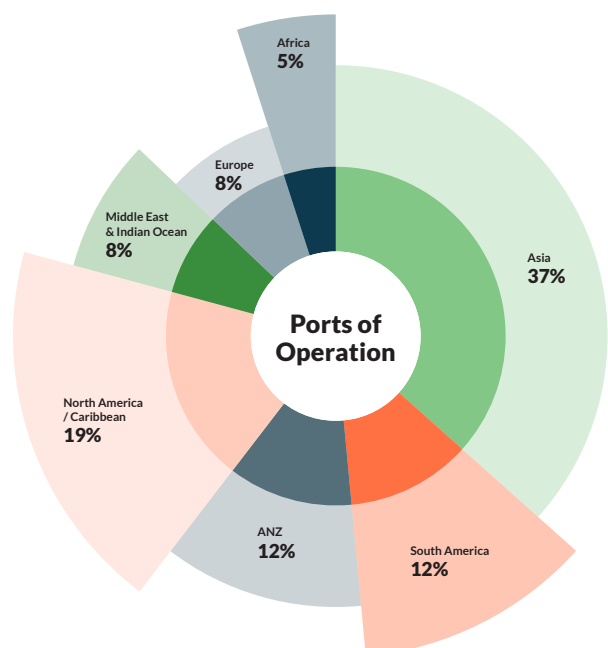
Construction

Swire Bulk is well-placed to be a long-term partner of choice for its global customers and deliver market-leading, innovative, and sustainable freight solutions.

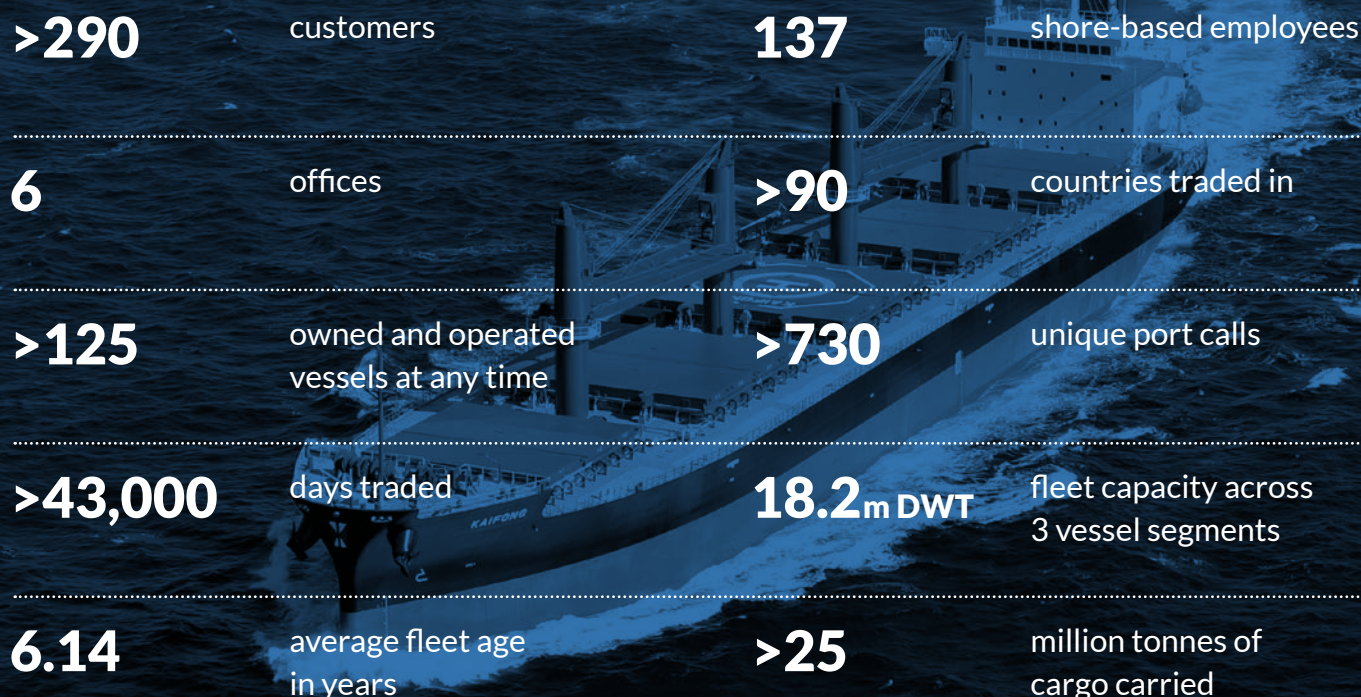
2023 Commodity Mix



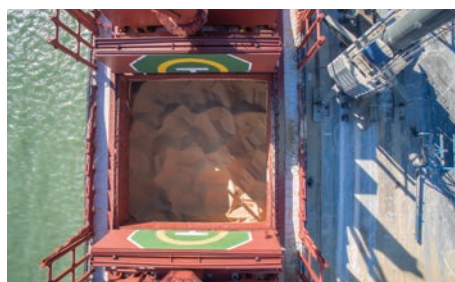
2023 Trade Areas



OUR COMPANY **AT A GLANCE**



Swire Bulk is your **dedicated partner of choice** across dry bulk, breakbulk and parcelling cargoes:



Dry Bulk

Swire Bulk transports dry bulk commodities including grain, steel, cement logs, and coal globally for a variety of customers worldwide. The Company's bulk carrier design maximises the cubic capacity in each hold to allow for a greater volume of cargo to be carried on board more efficiently.



Breakbulk

Due to the bulk carrier designs, Swire Bulk can ship unitised cargo like containers and rail wagons on deck. This offers flexibility to customers and maximises overall freight capacity.



Parcelling

The global parcelling division carries various combinations of bulk and breakbulk cargoes. Swire Bulk focuses on niche industrial sectors, working with traditional bulk charterers, and developing new relations with unitised parcel-focused customers. The cargoes include bulk and bagged industrial commodities, steel and machinery products, forestry products, and project cargoes like windmill blades.

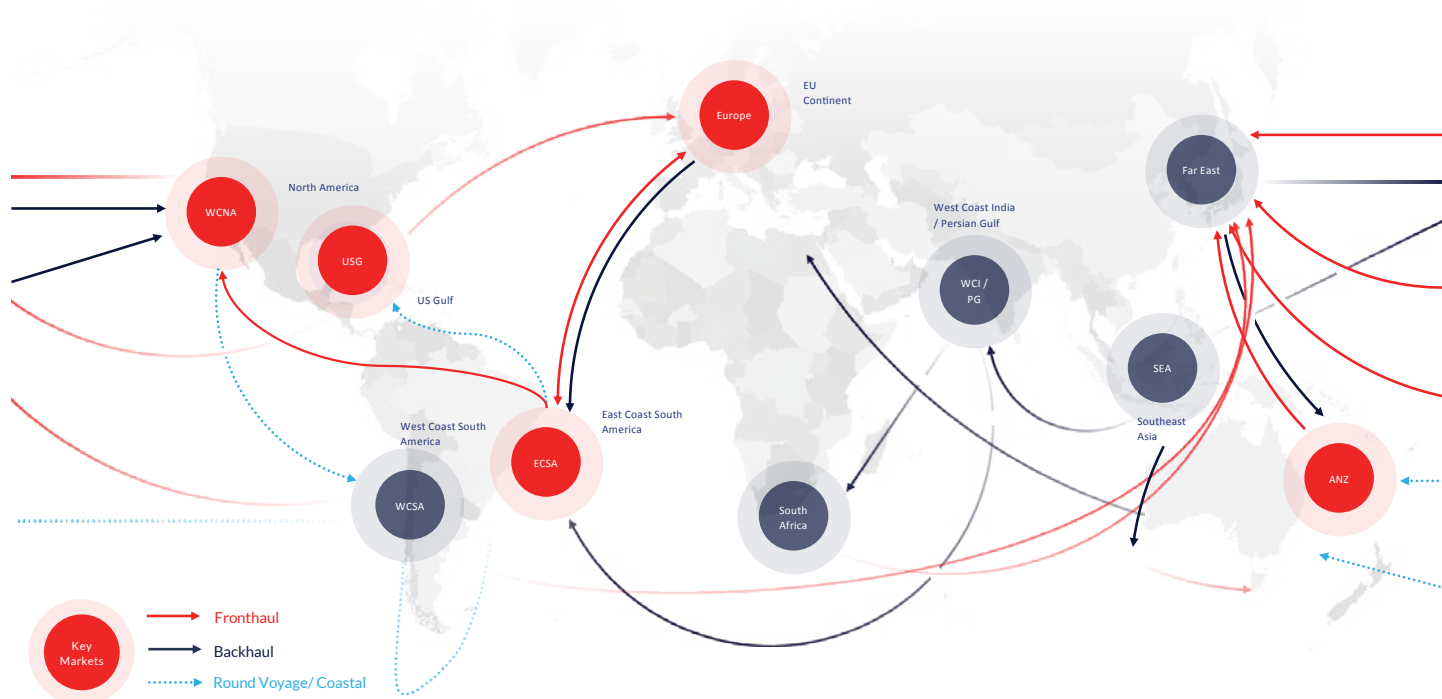
Swire Bulk provides commercial services, voyage operation services, and supervision of third-party ship managers. Bunker procurement is outsourced to a third-party. Vessel technical management is outsourced to third-party ship management companies that provide technical management services ranging from repairs, regulatory compliance, maintenance and crew management to procurement of spares and supplies for the vessels.

OUR OFFICES GLOBAL PRESENCE



OUR GLOBAL NETWORK

Shipping Between All Continents



MEMBERSHIPS / ASSOCIATIONS



Getting to Zero Coalition

Swire Bulk signed a Call to Action for Shipping Decarbonisation under the *Getting to Zero* 2030 Coalition in September 2021. This is a partnership between the Global Maritime Forum, the Friends of Ocean Action and the World Economic Forum.



Maritime Anti-Corruption Network

Swire Bulk is a member of Maritime Anti-Corruption Network (MACN). MACN works towards the elimination of all forms of maritime corruption.



Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

Through its company, John Swire & Sons Ltd., Swire Bulk is a Strategic Partner with the Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping (MMMCZCS).



Women's International Shipping & Trading Association

Swire Bulk is a member of the Women's International Shipping & Trading Association (WISTA) in Singapore (joined in 2022). WISTA has a consultative status at the International Maritime Organisation (IMO).



Sustainable Shipping Initiative

Swire Bulk has been a participant in the Sustainable Shipping Initiative (SSI) over the years, through sister company Swire Shipping, and became a member in its own right in 2023. The SSI is a coalition of shipping leaders from around the world, formed to take practical steps to tackle some of the sector's biggest opportunities and challenges. The group is working to achieve a vision "of an industry in which sustainability equals success".



World Ocean Council

Swire Bulk joined the World Ocean Council (WOC) at the start of 2023. The WOC is a global, cross-sectoral ocean industry leadership alliance committed to "Corporate Ocean Responsibility", developed by and for the private sector, with a unique and multi-sectoral approach to address cross-cutting issues affecting the sustainable development of the ocean, related science and the stewardship of the seas.



Singapore Shipping Association

Swire Bulk joined Singapore Shipping Association (SSA) in December 2023. SSA represents a wide spectrum of shipping companies and other businesses allied to the shipping industry.



Singapore Business Federation

The Singapore Business Federation is the apex business chamber championing the interests of the Singapore business community in the areas of trade, investment and industrial relations.

OUR APPROACH TO SUSTAINABILITY

Swire Bulk has the governance structures in place together with policies and procedures to ensure that the Company is a market leader in terms of safety and quality of operations as well as meeting its sustainability commitments. Sustainability remains central to the business strategy, as reflected in the Vision statement. Priorities have been identified, which are based on the material sustainability topics, that drive the creation of long-term value for Swire Bulk's business and stakeholders.

Sustainability Governance

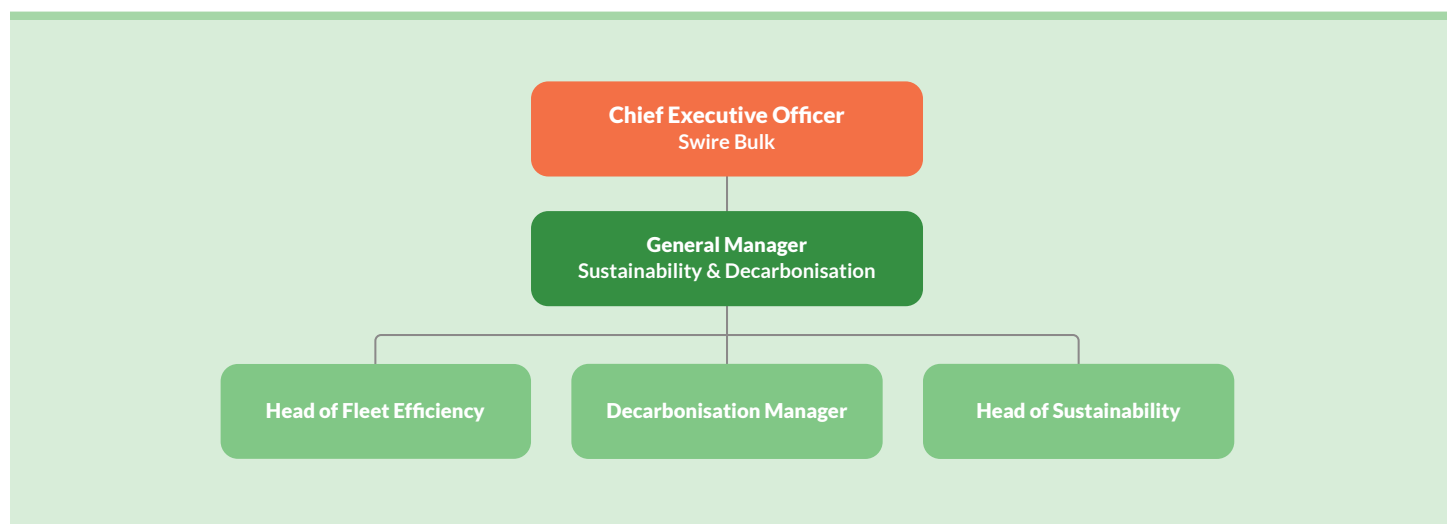
The parent company's Board of Directors is the highest-level governance and oversight body that sets the strategy for its subsidiary companies. The Board's oversight responsibilities include strategy, risk management, compliance and internal audit as well as ESG-related matters.

Swire Bulk's General Manager (GM) for Sustainability and Decarbonisation (S&D) is a member of the Executive Leadership Team (ELT), reporting directly to the Chief Executive Officer (CEO). The S&D Department manages implementation of ESG areas within the Company and has three key areas of focus:

- The **Fleet Efficiency team**: responsible for measuring and improving the efficiency of owned and chartered-in tonnage.
- The **Decarbonisation Manager**: responsible for driving current and future projects to accelerate knowledge of and engagement with alternative and future fuels supply chains.
- The **Sustainability team**: covers various ESG areas to ensure that Swire Bulk addresses all relevant ESG topics as well as sustainability reporting.

Two sustainability performance reports are prepared each year for Swire Bulk's Board of Directors to keep them abreast of the latest regulatory requirements and the Company's progress against its sustainability priorities.

The S&D Department works together with various internal stakeholders on addressing growing ESG expectations, compliance and reporting requirements as well as to further enhance Swire Bulk's position as a sustainability leader within the dry bulk sector.



Our Sustainability Policies

Swire Bulk's business activities and stakeholder relationships are guided by the following policies. Links to these policies can be found at

<https://swirebulk.com/about-us/policies>



SwireBulkTHRIVE

Swire Bulk's Sustainability strategy, "SwireBulkTHRIVE" is fully aligned with the Swire Group's Sustainability Strategy (SwireTHRIVE) and covers other areas which are material to Swire Bulk's operations. SwireBulkTHRIVE has three focus areas: Thriving People, Thriving Environment, Thriving Partners.



Short-, medium- and long-term targets have been developed and aligned with internal stakeholders to step up the Company's ambitions and measure performance. Progress made on achieving these targets over the reporting year is covered in this report.

Swire Bulk has the governance structures in place together with policies and procedures to ensure that the Company is a market leader in terms of safety and quality of operations as well as meeting its sustainability commitments.

THRIVING PEOPLE



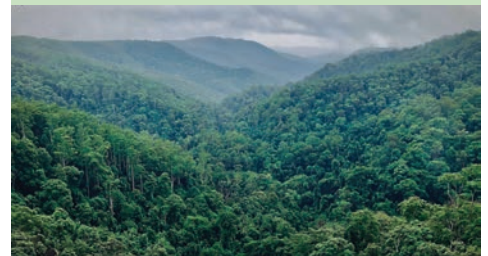
We will respect and care for the human rights of our employees and other stakeholders, unlocking the potential for all of them to grow.



THRIVING ENVIRONMENT



We will create a resilient environment that provides for our future.



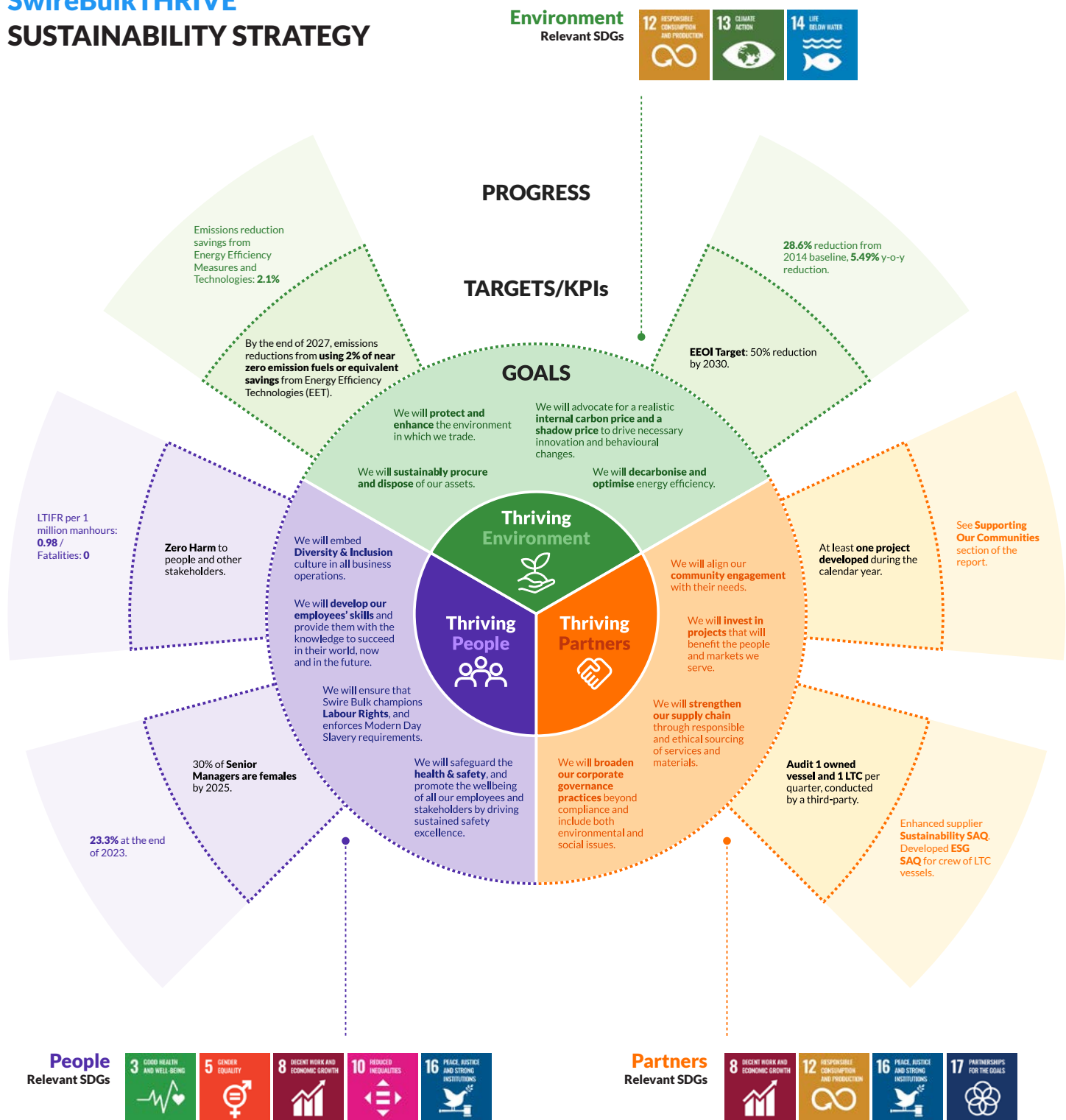
THRIVING PARTNERS



We will work with stakeholders wherever we operate to improve people's lives.



SwireBulkTHRIVE SUSTAINABILITY STRATEGY



Swire Bulk's sustainability focus areas are aligned with several of the United Nations Sustainable Development Goals (UN SDGs) designed to achieve a better and more sustainable future for all. The Company reports against SDG 3, 5, 8, 10, 12, 13, 14, 16 and 17. See page 51 for more information.

Stakeholder Engagement and Materiality

The Materiality Matrix can be found on page 48 and will be refreshed every three years. This report continues to focus on the most material topics identified and progress made over the calendar year 2023.

TAKING CLIMATE ACTION

GHG Emissions Reduction and Climate Change

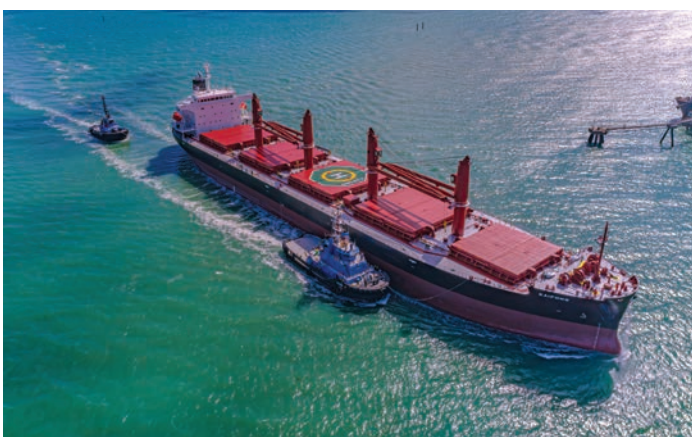
Shipping is crucial to the global economy. Global maritime shipping accounts for 80% - 90% of the total international trade by volume or around 70% by value*. Dry bulk ships account for about half of seaborne trade and 45% of the total world fleet**. While shipping is an economical and energy-efficient way of transporting cargo, it produces around 3% of global CO₂ emissions. Therefore, greenhouse gas (GHG) emissions in the sector must be reduced to help combat climate change.



During the meeting at the Marine Environment Protection Committee (MEPC 80), the IMO adopted the 2023 IMO Strategy on Reduction of GHG Emissions from Ships, with enhanced targets to tackle harmful emissions.

The revised IMO GHG Strategy includes an enhanced common ambition to reach Net Zero GHG emissions from international shipping by or around, i.e. close to 2050, a commitment to ensure an uptake of alternative zero and near zero GHG fuels by 2030, as well as indicative checkpoints for 2030 and 2040. Swire Bulk has a Decarbonisation Roadmap that sets out short-, medium- and long-term targets to decarbonise vessel operations, which are fully aligned or more ambitious than the IMO targets.

*www.dowjones.com/professional/risk/resources/risk-blog/maritime-risks-rise

**<https://econofact.org/the-role-of-shipping-in-world-trade>



	Scope 1	Scope 2	Scope 3
Emissions Reduction Target 	As per the Decarbonisation Roadmap See page 15	Net Zero by 2050 Scope 2 covers electricity use in Swire Bulk offices. Near Term Target: Use renewable electricity (RE)* in offices (where available) by 2030. *Electricity generated by renewable sources	Net Zero by 2050 Near Term Target (for selected Categories only): Offsetting emissions from all shore-based management as well as material events (in place).
Progress 	Progress against these targets is detailed in this report.	Scope 2 covers electricity use in Swire Bulk offices. Singapore, Vancouver and Hamburg offices are using RE. This accounts for 21% of 2023 kWh usage. The Company is committed to doing the same in other key locations to achieve its 2030 target.	Assessed Scope 3 emissions and identified hot spot categories.

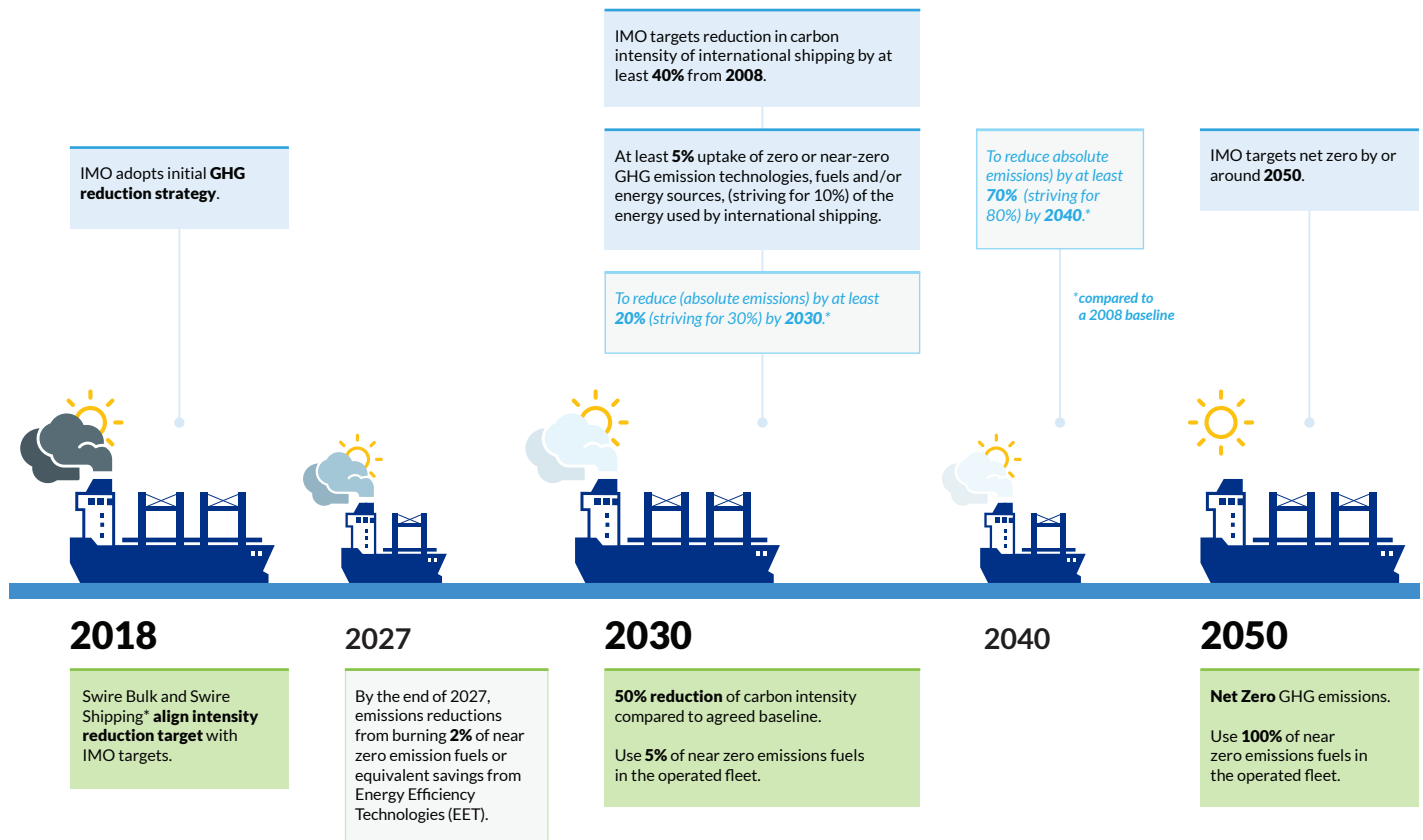


Achieving the Net Zero emission target by 2050 will not be possible without the development of low carbon fuels, in addition to the continuous improvement of voyage and vessel performance as well as adopting Energy Efficiency Technologies (EETs). Swire Bulk is dedicated to being an active industry contributor to the development and adoption of technologies that will reduce emissions as they become available.

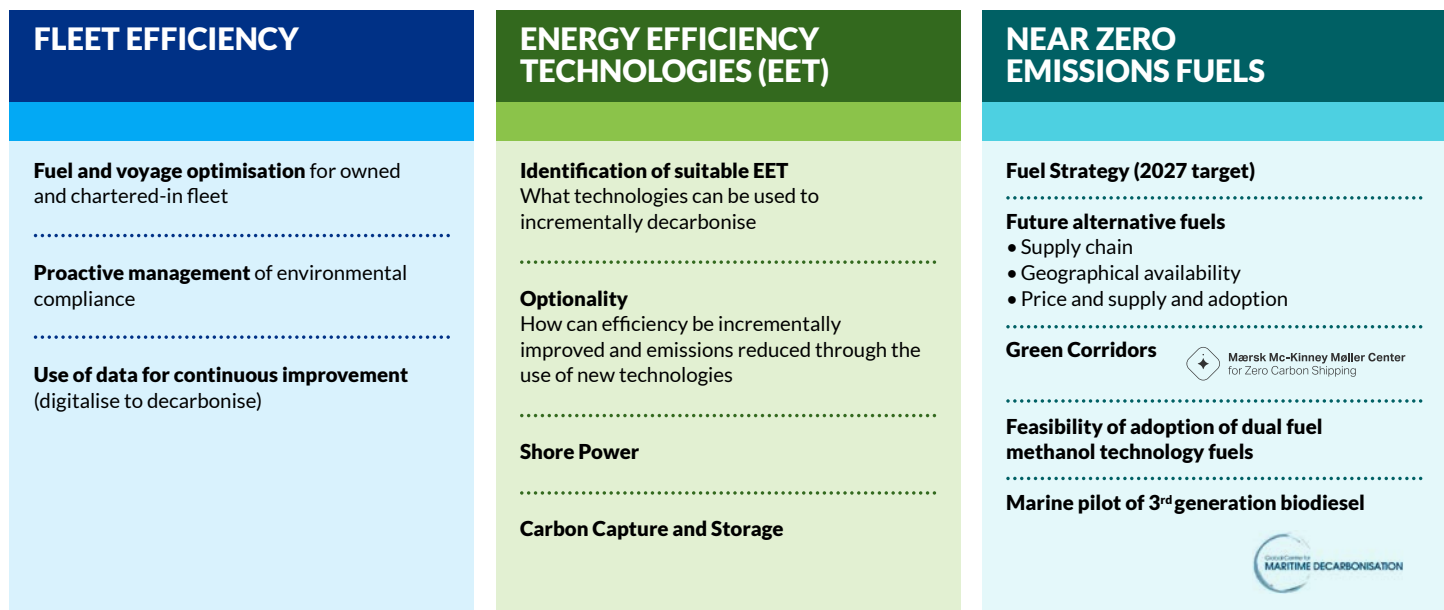
Swire Bulk has in place a Decarbonisation Roadmap that sets out short-, medium- and long-term targets to decarbonise vessel operations.

Swire Bulk does not currently work with the Science Based Targets initiative (SBTi) because SBTi Maritime Guidance advocates action to achieve Net Zero by 2040, while the Company's current ambition is Net Zero by 2050, which is consistent with IMO's target. This is already very ambitious for hard to decarbonise industry sectors like the Handysize / Supramax dry bulk tramp shipping sector.






Decarbonisation Roadmap

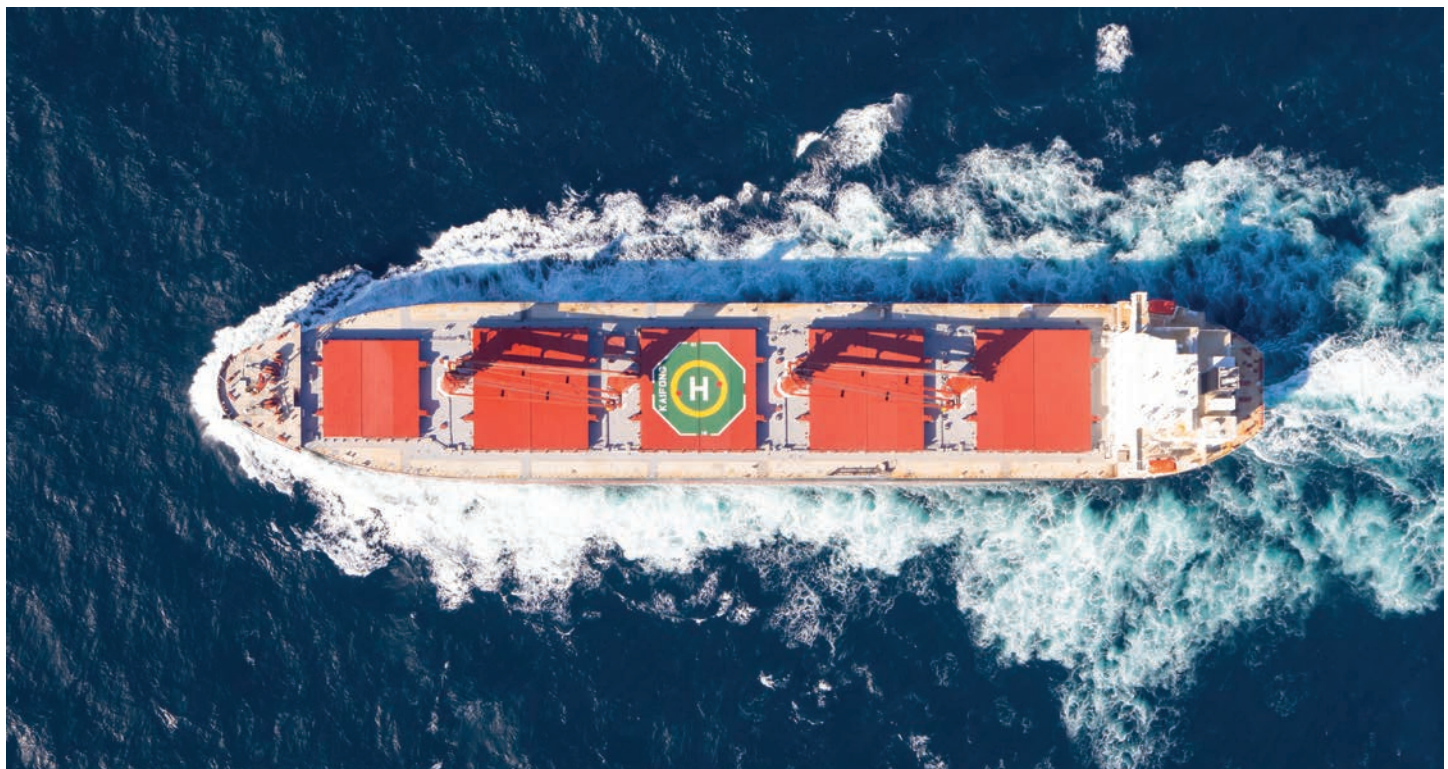


Decarbonisation Strategy 2023 - 2027: 3 Pillars



Key Enablers

Collaborative Platforms for knowledge sharing and research	→  Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping		
Alliances & Synergies	→ Green Voyages, SailGreener		
Regulatory frameworks	→ UK Chamber of Shipping, World Shipping Council, Getting to Zero 2030 Coalition		



Energy Efficiency Operational Indicator

The GHG emissions for each vessel are monitored on both a per voyage and annual basis, according to the IMO guidelines. The Energy Efficiency Operational Indicator (EEOI) measures the energy expended moving one unit of cargo over one nautical mile. In the short- to medium-term, this is considered to be the best metric, which encourages a more efficient use of the vessels. EEOI will be the primary focus for Swire Bulk when measuring energy efficiency.

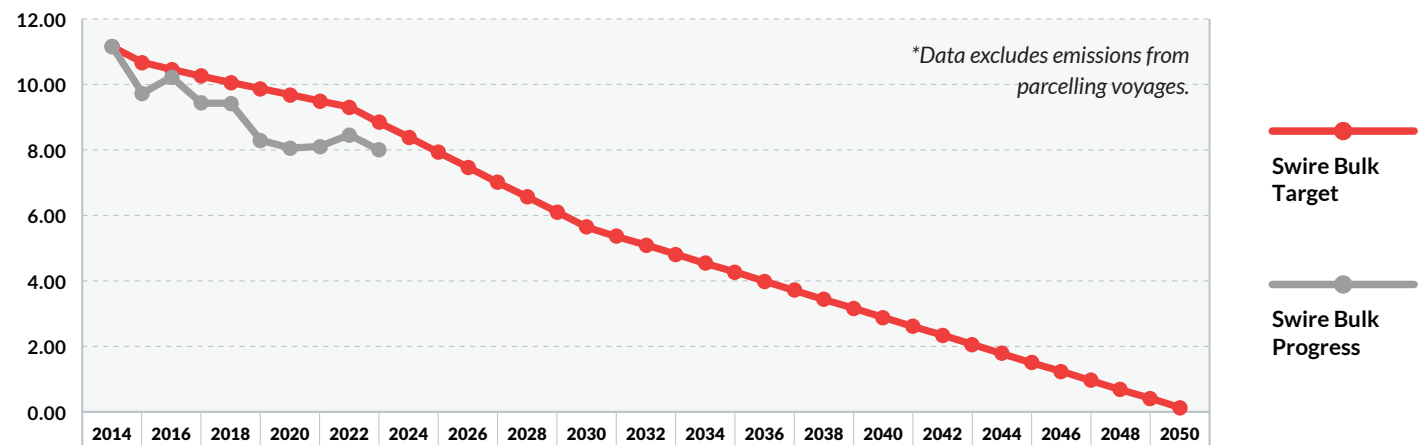
Swire Bulk is committed to deploying the most fuel-efficient vessels (average age of 6.14 years in 2023), minimising ballast days, and maximising cargo intake (including maximising the space on deck for carrying cargoes) to provide the most economical way to transport dry bulk cargo.

Swire Bulk has consistently delivered a market-leading EEOI score compared to peers in recent years.

A detailed emission report is produced and shared with customers for every voyage recording the distance travelled, cargo carried, fuel consumed and the associated emissions together with the EEOI score.

Swire Bulk EEOI

UoM: grammes of CO₂ per tonne of cargo carried over one nautical mile



Absolute Emissions

Scope 1 and 2 emissions are measured annually. Scope 3 (indirect) emissions cover only shore-based employees' flights.

Assessment of Scope 3 emissions

Swire Bulk worked with a third-party consultancy on estimating its full Scope 3 emissions to better understand boundaries and hot spot categories. Scope 3 emissions cover indirect emissions, which are a consequence of Swire Bulk's activities but arise from sources that are owned or controlled by other organisations.

Scope 3 emissions calculations were based on spend data for Calendar Year 2022. The analysis showed that the two most material Scope 3 Categories are:

- Category 3** Fuel- and energy-related activities; and
- Category 13** Downstream leased assets.

Total Scope 3 emissions accounted for **25% of the GHG inventory in 2022**.

Given that Scope 3 emissions are under 40% of the total GHG inventory, Swire Bulk will not be setting interim Scope 3 reduction targets. The Company will continue to periodically assess its indirect emissions going forward.

GHG Emissions from All Vessels under Swire Bulk's Operational Control

Number of Vessels Operated Over the Calendar Year

2023



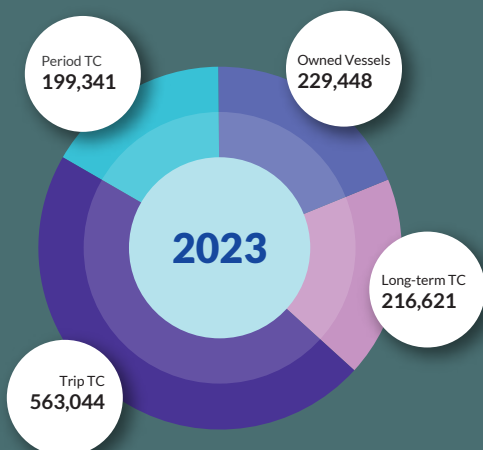
405

2022



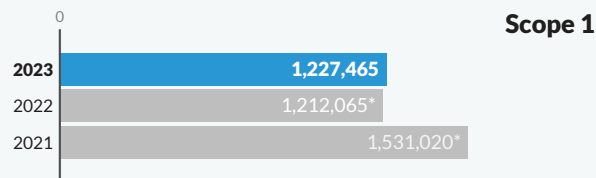
309

Scope 1 Emissions

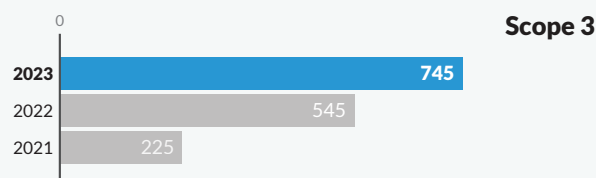
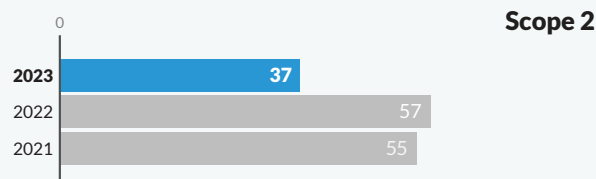


Scope 1 Emissions by Owned and Time-chartered
(TC)-in Vessels in 2022 (tCO₂e)

Total tCO₂e



*Data has been restated to include other GHG emissions. See page 44.



Scope 3 emissions cover the category of shore-based employees air travel only

Scope 1 tCO₂e / vessel day



Other Air Emissions in Metric tonnes

SO_x2023
3,7832022
3,985NO_x2023
29,9092022
29,390

Particulates

2023
2,3802022
2,333

VOC

2023
4642022
458

Black Carbon

2023
3,9362022
4,329

EEXI, CII and EU ETS / FuelEU

Energy Efficiency eXisting ship Index (EEXI) is an extension of the Energy Efficiency Design Index (EEDI) regulation (a measure related to the technical design of a ship). Originally, the EEDI applied to newbuilding vessels with building contracts placed on or after 1st January 2013 or ships delivered on or after 1st July 2015.

The attained EEXI must be calculated for the individual ship, which falls under the regulation. For vessels that do not comply, remedial measures including engine or shaft power limitations may be required. Among Swire Bulk's 23 owned vessels, only four vessels have been equipped with Engine Power Limitation to comply with this regulation. This means that 83% of the Swire Bulk owned fleet is highly efficient and does not require any additional measures.

Swire Bulk has one of the most modern and fuel-efficient fleets on the water, with the average fleet age of owned vessels being 6.14 years.

Reporting of EEXI is a one-time calculation, based on the ship's design data whereas reporting of CII requires annual reporting, monitoring and verification based on the ship's operations.

Carbon Intensity Indicator

Swire Bulk's proactive approach to managing its Carbon Intensity Indicator (CII) ratings further demonstrates its commitment to reducing GHG emissions. By monitoring vessel performance and implementing targeted strategies to optimise fuel consumption, the Company strives to achieve and maintain high CII ratings, thereby contributing to its sustainability goals and regulatory compliance.

The Fleet Efficiency team issues a vessel-specific CII scorecard to make sure that monthly and yearly CII performance is evaluated and that any necessary actions are implemented without delay.

CII ratings for owned vessels have a rating "C" or better, indicating that Swire Bulk's fleet is very efficient.

CII Ratings	No. of Owned Vessels
A	12
B	9
C	2
D	-
E	-

*CII Ratings as of 31st December 2023

EU Emissions Trading Scheme and FuelEU Maritime

The European Union (EU) legislative bodies have reached an agreement to include shipping in the EU Emission Trading Scheme (ETS) with effect from 2024. This is the first significant programme in which the sea transport value chain will have to pay for its carbon emissions. This is a part of the "Fit for 55" package to contribute to the EU's climate goal of reducing net GHG emissions by at least 55% by 2030 and reaching climate neutrality by 2050.

A provisional agreement of the FuelEU Maritime regulation was reached in March 2023. The initiative aims to increase the demand for renewable and low carbon fuels and reduce GHG emissions in the maritime sector. It sets targets on the GHG intensity of energy used on board by ships from 2025. The revenues generated from penalties under this regulation will be allocated to support innovation in the EU.

FuelEU Maritime will apply in parallel with the EU ETS. Shipping companies must comply with the FuelEU Maritime from 2025 and at the same time surrender the required EU allowances under the EU ETS. These two regulations jointly work to put maritime transport on the trajectory of the EU's climate targets for 2030 and 2050. One of the major differences between both regulations is that FuelEU Maritime considers Well-to-Wake emissions (life cycle emissions) while the EU ETS only considers Tank-to-Wake emissions (on board emissions). Processes are in place to comply with the EU ETS in 2024 and the FuelEU Maritime in 2025.

Global Collaborations

Swire Bulk is a signatory to the *Getting to Zero 2030* Coalition and is committed to working on the long-term ambition to fully decarbonise its operations. The Company is engaging with alternative fuel producers, new technology companies, engine manufacturers, ship designers and other stakeholders to evaluate and subsequently adopt measures that will drive Swire Bulk towards its decarbonisation ambitions.

Swire Bulk's parent company, John Swire & Sons Ltd., is a strategic partner of the Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping (MMMCZCS)*. Members are collectively addressing ways to advance the industry's energy-transition journey either through policy, research on new fuels, designs and technology, research on availability of new fuels and exchanging views on sustainable practices at an industry level.

*<https://www.zerocarbonshipping.com>

Task Force on Climate-related Financial Disclosures

There is a growing demand for climate-related information by investors, lenders, insurers and other stakeholders. The Task Force on Climate-related Financial Disclosures (TCFD) provides a framework to help companies disclose climate-related risks and opportunities as well as to identify potential financial impacts they may face due to climate change.

Swire Bulk participated in a series of workshops (supported by John Swire & Sons Ltd.) with third-party consultants to assess the relevant climate-related risks and opportunities. A number of risks were identified, and most significant risks will be a part of the wider Enterprise Risk Management Assessment and monitored regularly by the Company and at the Group level.

ENVIRONMENTAL INITIATIVES AND ACHIEVEMENTS

Fleet and Voyage Efficiency

Swire Bulk is committed to making ongoing efforts to enhance fleet efficiency. Through a combination of internal key performance indicator (KPI) scorecards, proactive analysis and actions together with the adoption of innovative technologies, the Company strives to minimise its environmental impact while maximising operational excellence. There are several key components to how this is achieved:

Internal Fleet Efficiency KPI Scorecards

Internal fleet efficiency KPI scorecards serve as a crucial tool for tracking and evaluating vessel performance. These scorecards are updated on a monthly basis and provide insights into fuel consumption metrics and overall operational efficiency. By comparing current performance to historical and technical benchmarks, areas for improvement are identified.

Vessels that perform below expectations undergo detailed root cause analysis to pinpoint the underlying issues and corrective actions are implemented. These usually include hull cleaning and propeller polishing to enhance fuel efficiency. Underwater hull inspections are carried out at regular intervals of six to 12 months. This practice ensures that hull conditions remain optimal, minimising excess fuel consumption caused by increased resistance due to fouling.

Shaping a Mindset for Fuel Efficiency and Environmental Compliance

Swire Bulk holds pre-joining briefings for Masters and Chief Engineers, covering best practices in fuel efficiency, emphasising the significance of data quality, and highlighting environmental regulations and their implications. Those briefings play a crucial role in shaping the mindset of seafarers and encourage them to take proactive measures to enhance both vessel fuel efficiency and environmental compliance.

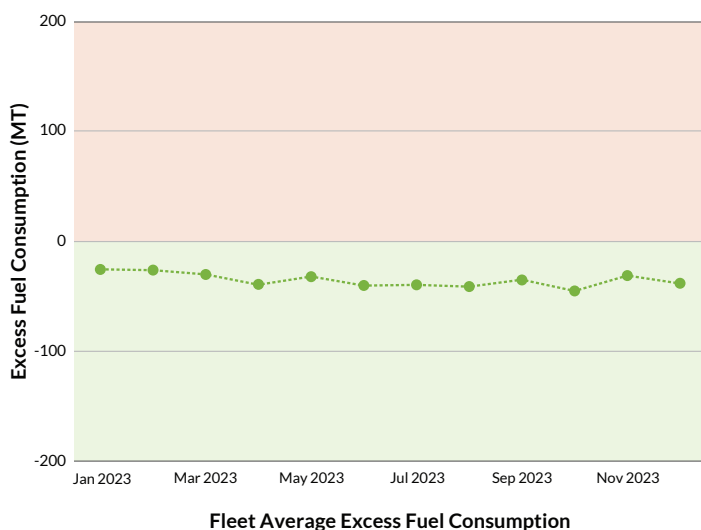
Third-party Tools and Route Optimisation

Swire Bulk leverages third-party weather routing services and performance management systems to optimise voyage routes and minimise fuel consumption. By considering factors such as wind, waves and currents, emission reductions are achieved together with enhanced operational reliability.

Energy Efficiency Technologies

Swire Bulk continued enhancing energy efficiency on vessels by evaluating and implementing application of EETs available in the market. A variety of EETs implemented to date cover: twisted leading-edge rudders with bulb, optimised propellers and bow designs, trim optimisation integrated with loading computers and improved hydrodynamic efficiency.

Swire Bulk Owned Vessels



Swire Bulk's operations team and chartering managers spare no effort to optimise the fleet's efficiency, fuel consumption and operational flexibility to achieve a best-in-class fleet.



In 2023, Swire Bulk continued enhancing energy efficiency on vessels. This was done by evaluating and implementing the application of EETs available in market such as silicone-based hull coatings, which significantly improve hull performance by reducing water resistance. Unlike traditional hull coatings, these silicone-based coatings create a smooth, low-friction surface that resists fouling organisms adhering to the hull. In 2023, Swire Bulk has successfully applied this coating to six vessels.

Swire Bulk's third-party ship management companies have dedicated resources responsible for collecting and analysing fuel use data. One of the third-party managers, Swire Shipping, manages the implementation of performance management system using "COACH Solutions" across their managed vessels. Fleet Optimisation Solution by Wärtsilä is used on four vessels managed by Anglo-Eastern Maritime Services.

COACH Solutions has also been deployed on Swire Bulk's chartered-in vessels. The roll-out started in 2022 and expanded to all chartered-in fleet in 2023.

Swire Bulk's operations team and chartering managers spare no effort to optimise the fleet's efficiency, fuel consumption and operational flexibility to achieve a best-in-class fleet.

Swire Bulk has worked to develop voyage triangulations in key markets, where a network of consecutive voyages aims to reduce ballast days between voyages, optimising fuel consumption and increasing vessel utilisation.

As a result of Energy Efficiencies Measures and Technologies, 8,131 metric tonnes of fuel was saved, avoiding the emission of 25,622 tCO₂ to the environment during the reporting period for Swire Bulk owned vessels.

Emission reduction savings from energy efficiency measures and technologies: 2.1%*

**Based on emissions from consumed marine fossil fuels (Scope 1)*

Energy efficiency / GHG emissions are reported in accordance with EU Monitoring, Reporting and Verification ("MRV") requirements and the IMO Data Collection System ("DCS").

Swire Bulk owned fleet has been provided with vessel-specific MRV plans and class-endorsed DCS plans. In this way, all relevant information pertaining to carbon emissions, cargo carried, time spent and distance travelled in the EU region and globally are verified by an authorised third-party verifier before being shared with the EU Commission.

Under the DCS plans, data is verified by third-party verifier DNV. All relevant compliance certificates are maintained for the fleet as required by both MRV and DCS legislations.

Use of Sustainable Biofuels

As a drop-in fuel, biofuel provides a feasible solution for maritime decarbonisation, although with limited supply and higher costs. The IMO approved an interim guidance on the use of biofuels in July 2023 in MEPC 80, which came into effect on 1st October 2023. This helps to further encourage the use and supply of biofuels for maritime transport. Swire Bulk has been exploring the options to use sustainable biofuels for its operated fleet. The biofuel supply and availability in geographies where Swire Bulk operates is being discussed with various biofuel suppliers including Argent Energy (a waste-based biodiesel producer and part of the Swire Group).

Identifying Suitable New Technologies

New EETs are continuously being evaluated to ensure Swire Bulk is aware of emerging technologies that might be suitable for the fleet, both owned and chartered-in.

An innovation fund was set up in 2023 to trial / pilot novel EETs to reduce vessel emissions. This is an annual fund set as a function of the amount of fuel consumed in the prior year and represents a significant investment by the Company, in the commitment of reducing emissions.

PROTECTING THE ENVIRONMENT

Marine Biodiversity Protection and Pollution Prevention

Over the past decade, the shipping industry has taken steps to safeguard marine ecosystems. These measures include establishing frameworks to protect biodiversity through proper ballast water release, applying anti-fouling paint to prevent the spread of invasive species, minimising harm to marine life, and reducing chemical, oil and plastic pollution.

Despite these efforts, ocean management and pollution control remain inconsistent. The global potential for protection remains largely untapped by both companies and governments. To address this, efforts should focus on technical measures, implementing on board circular waste systems and collaborating with ports to enhance recycling practices and reduce landfill waste.

Swire Bulk aims to ensure that best practices are implemented on board, and all relevant regulations are complied with. The Company has in place a number of high-level policies (e.g. Biodiversity, Environmental and Sustainable Development Policies*) which provide the framework for reducing Swire Bulk's environmentally negative impact on biodiversity under its influence.

The various inputs to operations (such as fuel, paint, ballast water, food and packaging, cargo packing materials, lubricant oil and chemicals), while vital to operations and improving vessel efficiency, can also result in negative impact on the biodiversity in the areas where Swire Bulk operates. Accidental spills and operational discharges are key causes of marine pollution from shipping activities, with potential widespread adverse impact on marine life. Swire Bulk ensures that best practices are implemented on board, and all relevant regulations are complied with. For the owned fleet, Vessel Quality Standard inspections are required to meet the conditions of the Safety Management System of each third-party ship managers. Any incidents involving spillage are investigated, reported and actions taken to mitigate recurrence.

There were zero spills to the marine environment in 2023.

There is a need to identify and assess biodiversity issues of concern to eliminate or minimise adverse impacts on biodiversity. Swire Bulk has Biodiversity Issues of Concern (BIC) and Biodiversity Action Plan (BAP) manuals that highlight higher-risk areas. BIC looks at issues of concern such as marine and shore discharge, atmospheric emissions, and their impacts while BAP looks at the Ecologically and Biologically Significant Marine Areas and Particularly Sensitive Sea Areas.

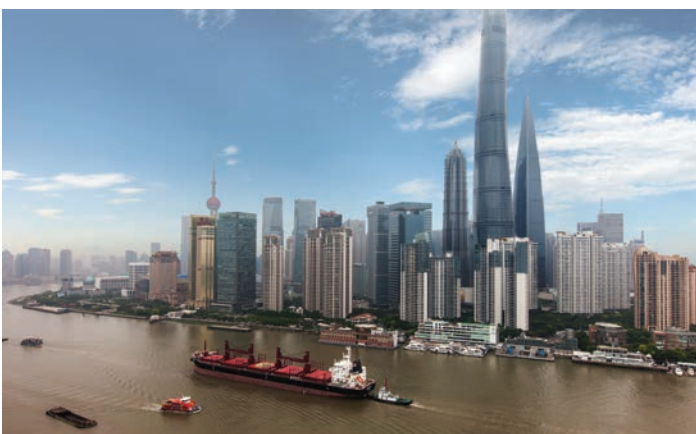
Swire Bulk owned vessels spent 1,289 days in marine protected areas or areas of protected conservation status in 2023.

When Swire Bulk vessels sail through these areas, all relevant local laws and regulations, often involving slow-steaming or using ultra-low sulphur fuel to protect marine biodiversity or reduce emissions, are adhered to.

All owned vessels in the fleet are compliant with the IMO Ballast Water Management Convention by having ballast water treatment systems. Ballast water management plans are in place to ensure the IMO and relevant coastal states standards are fully complied with.

*<https://swirebulk.com/about-us/policies>

Swire Bulk owned vessels spent 1,289 days in marine protected areas or areas of protected conservation status in 2023.



Voluntary Speed & Emissions Reduction Programmes

Supporting Vancouver Fraser Port Authority's Commitment to Saving Whales

Swire Bulk participates in the Enhancing Cetacean Habitat and Observation (ECHO) Programme, which aims to reduce underwater noise generated by vessels to support the recovery and survival of endangered southern resident killer whales (*Orcinus orca*).

The programme is led by the Port of Vancouver, which coordinates the voluntary vessel slowdown initiatives in key feeding areas within the whales' critical habitat. The programme contributes to reducing the impact of commercial shipping on at-risk whales off British Columbia's southern coast. The speed reduction applies to Haro Strait, Boundary Pass and Swiftsure bank areas. Vessels are expected to slow down to 11 knots or less.



Supporting Port of Long Beach's Green Flag Programme

Swire Bulk is committed to 100% compliance with the Port of Long Beach's Green Flag Programme to cut air pollution around the area. This is a voluntary vessel speed reduction programme for vessel operators requiring them to slow down to 12 knots or less within 40 nautical miles of Point Fermin. This helps to cut air pollution such as smog-forming nitrogen oxides, diesel particulate matter and GHG emissions around the Long Beach area.

Swire Bulk was honoured with the 2023 Green Flag environmental achievement at Tier 2 (40 nautical miles). In 2023, a 100% participation rate was achieved for all vessels calling at Long Beach, surpassing the programme requirement of 90%.



The Green Flag Programme exemplifies a proactive approach to addressing the environmental impacts of maritime transportation. It not only supports sustainable port operations but also fosters collaboration amongst industry stakeholders, regulatory agencies and local communities.

Protecting Blue Whales and Blue Skies Vessel Speed Reduction Incentive Programme in California

Swire Bulk is a participant in the Protecting Blue Whales and Blue Skies programme in the San Francisco Bay Area and the Southern California Region. The vessels are a significant source of noise and air pollution, and occasionally ships can accidentally hit endangered blue, humpback and fin whales. The Vessel Speed Reduction incentive programme is a voluntary programme, where vessel operators are asked to slow down to a speed of 10 knots or less, which reduces air pollution, fatal strikes on endangered whales, and ocean noise.

Deviating Vessels to Protect Endangered Whales

From 2023, Swire Bulk has deviated vessels from the Southern waters of Sri Lanka. The area off Southern Sri Lanka is one of the busiest shipping lanes globally, and also serves as a feeding ground for many cetaceans. This voluntary move by the Company aims to decrease the number of ship-strikes against whales, which has been identified by researchers to be the leading cause of death for whales around Sri Lanka's waters.

Swire Bulk's vessels pass at least 15 nautical miles south of Dondra Head traffic separation scheme and avoid sailing through regions marked out as "no go areas". This directive applies to all vessels transiting to the south of Sri Lanka, excluding vessels calling Galle OPL and ports within marked areas. Any vessels calling Galle will reduce speed to eight knots as a way to reduce the likelihood of vessel-strikes.

"Sustainability and safety are at the core of our business and, in this case, we need to consider and prioritise the ecosystem in which we operate and the safety of marine wildlife. Swire Bulk is already a proud participant of the ECHO Programme, where we work with the Vancouver Fraser Port Authority to reduce underwater noise generated by vessels to support and save endangered southern resident killer whales. Rerouting our vessels in Sri Lanka is just another way that we can continue to do more for the ocean ecosystem.

Although this deviation will incur a small increase in voyage distances for our ships, this is the right thing for us to do. We are proud to act on the research initiated by a fellow Swire Group company and to raise awareness on how minor deviations can have a big impact on the welfare of endangered whales."

Peter Norborg
CEO, Swire Bulk



Filter Solution for Hold Cleaning Hazardous for Marine Environment Cargoes

Staying true to its commitment to sustainability, Swire Bulk utilises custom-built containers for filtering waters used for hold cleaning of Hazardous for Marine Environment cargoes. This initiative aims to protect and sustain cleaner marine environment for the future. This filter solution enables washing water to be cleaned before disposal back to the seas, reducing contaminants to a very high standard that is even fit for human consumption. The unique and patented Anchor Up/Swire Bulk Filter Solution 3.0 can collect and filter 120m³ washing water per day per unit and the filtered water is harmless to the marine environment.

Thanks to Swire Bulk's partner, Anchor Up Port Service GmbH, for sharing the same sustainability commitment towards protecting biodiversity at sea.

Recycling and Disposal of Materials

Swire Bulk seeks to minimise the amount of waste generated during operations and ensure the safe and responsible disposal of waste. The prevention of pollution from solid waste is regulated by MARPOL's Annex V, which prohibits the discharge of most waste into the sea. Waste accumulated aboard vessels is disposed of at designated port reception facilities and, where port facilities allow, as many waste materials are recycled as possible. All disposal of waste is recorded, and only qualified contractors are used.

Recycling bins are in place throughout Swire Bulk's offices as well as e-waste bins in Singapore. Recycling efforts are monitored regularly. Eco Office certification is in place for the Singapore Head Office and employees are regularly engaged in environmental education and activities. All waste is disposed of through licensed recycling and waste collection companies.



Sustainable Ship Recycling

The sustainable recycling of ships is the most sustainable and environmentally responsible way to manage ships at the end of their commercially viable lives. Swire Bulk strongly believes that it must, and can, be done in a safe and environmentally sound way.

Swire Bulk has a policy that all vessels at the end of their economic lives will be recycled in a safe, responsible and environmentally sound manner. The policy details how this will be assured by Swire Bulk and applies to its group vessels at the end of their economic lives that are not sold for onward trading. A copy of the policy is available on the Company website.*

Swire Bulk's owned fleet is very young, with an average age of six years in operation, and no vessels are expected to be recycled in the near future.

*<https://swirebulk.com/about-us/policies>

Eco Office certification

In 2023, Swire Bulk's Singapore office achieved the top tier Elite Eco Office certification awarded by the Singapore Environment Council for efforts in implementing effective environmentally responsible practices and increasing eco-consciousness amongst its employees. Certification involves an assessment of environmental practices, such as energy management, water management, resource and waste management and more.



Reducing Our Plastic Footprint

Marine plastic and microplastic pollution are harmful to marine biodiversity and human health. Around the world, billions of Single-Use Plastic (SUP) water bottles are used just once and then thrown away every year. Of these, only 9% are recycled and close to eight million tonnes of plastic leak into the oceans and aquatic environments annually. Therefore, in 2018, Swire Bulk set a goal to reduce SUP water bottles on board owned vessels to zero.

Under national flag regulations, ship owners must provide potable water on board; all Swire Bulk owned vessels produce their own potable water through reverse osmosis from seawater. The reverse osmosis units on board ensure best quality water is provided for the crew on board. Individual reusable water bottles are provided to encourage seafarers to “say no to single-use plastics”.

During 2023, work continued on reducing the number of SUP water bottles consumed across the fleet and a further 58% y-o-y reduction was achieved. This brings the overall reduction in SUP water bottles used on board the Swire Bulk owned fleet to 95% between 2018 (the baseline year) and 31st December 2023.

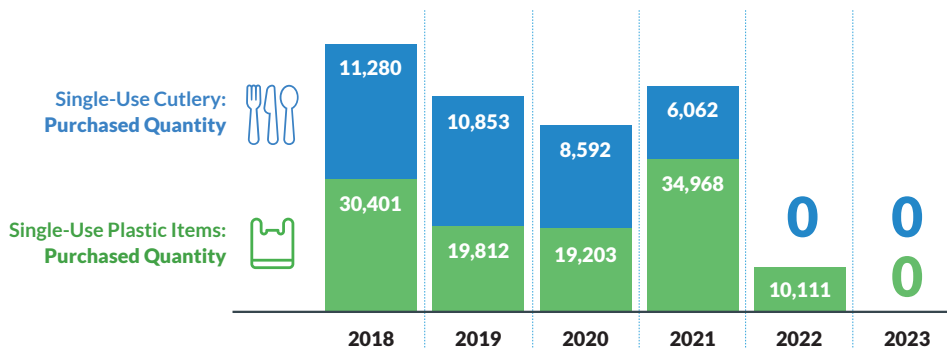
The Company is determined to continue the journey towards zero SUP water bottles within the Swire Bulk fleet. This will be a significant contribution towards protecting oceans and working together to achieve the UN SDG 14 (Life Below Water), which aims to have sustainably managed marine and coastal ecosystems free from pollution.

Swire Bulk also signed the IMPA SAVE pledge, an initiative launched under the International Marine Purchasing Association (IMPA) where shipowners, ship managers and shoreside suppliers pledge to significantly reduce or remove SUP bottles from their operations. Over 15% of global maritime industry players have committed to this goal.

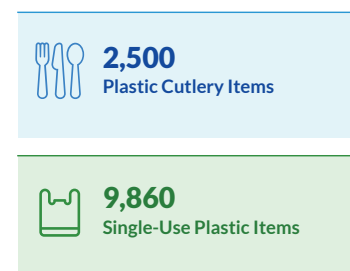
Ashore, employees are encouraged to reduce their SUP footprint by switching to reusable and more environmentally-responsible options. SUP is also eliminated from Company-organised events and this requirement has been incorporated into the “How to run a Sustainable Event” procedure.

One of the third-party managers, which is managing 83% of owned vessels, has banned single-use cutlery and eliminated the use of SUP items on board vessels managed by them. SUP items were replaced with biodegradable options. Swire Bulk is working with its other third-party manager on reducing and eliminating SUPs from the remaining owned vessels.

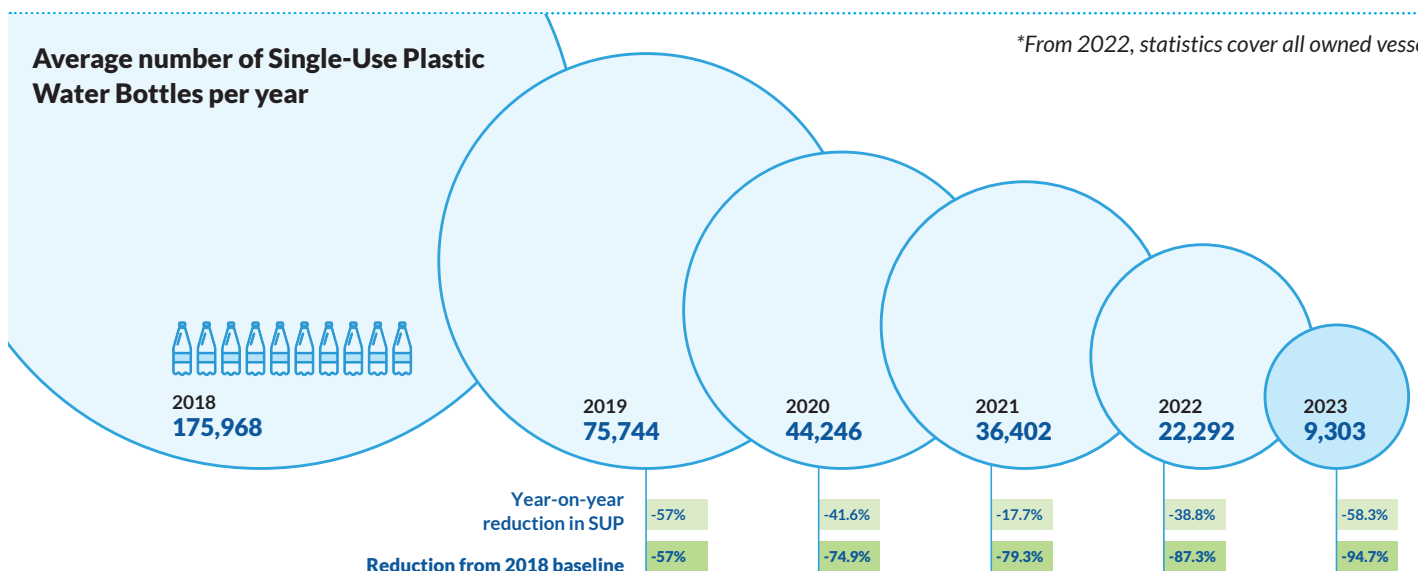
2023: Single-Use Cutlery / Single-Use Plastic Items on 83% of vessels



Remaining Single-Use Cutlery / Single-Use Plastic Items on 17% of vessels



Prior year data was tracked by one of Swire Bulk's third-party ship managers only. In 2023, Swire Bulk started to work with its second third-party ship manager on reducing the plastic footprint on remaining owned vessels.



Offsetting Carbon Emissions

Carbon offsetting involves financing reductions of emissions in other entities to balance CO₂ emissions from the Company's own operations. Electricity used in all Swire Bulk's offices (Scope 2 emissions) is offset, together with air travel undertaken by shore-based employees, and events organised and sponsored by Swire Bulk in 2023 (part of Scope 3 emissions).

Emissions are offset through Cathay Pacific's Fly Greener Programme. The emissions are offset through four different projects: cookstove replacement in Bangladesh; solar water heating in India; and household biodigesters and solar-powered cookers in the Chinese Mainland. These projects are certified under the Gold Standard to ensure that they are verifiable, credible and make a difference to local communities and the environment.

Offsetting is not an equal substitute for emission abatement and the primary focus remains on reducing emissions from operations in accordance with the Decarbonisation Roadmap.

Swire Bulk offset 783 tonnes of carbon using Fly Greener programme for emissions in calendar year 2023.



Zero Carbon / Zero Waste Events

Carbon emissions generated by material events and conferences organised and sponsored by Swire Bulk, are tracked, and offset following the zero waste and zero carbon event procedure. The aim is to increase overall awareness and reduce emissions associated with events. Work will continue with internal and external stakeholders on making those events carbon-neutral and waste-free.

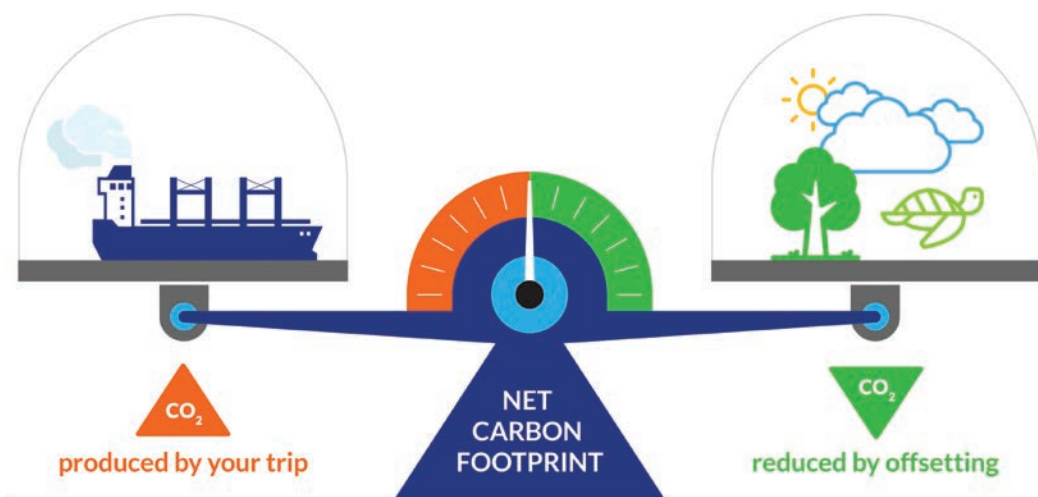


SailGreener

To find out more please visit:

https://swirebulk.com/wp-content/uploads/2023/01/SailGreener_CarbonNeutralShipments_SwireBulk.pdf

SailGreener is a programme through which Swire Bulk offers its customers an opportunity to offset the carbon footprint of their shipment(s) by contributing to projects that reduce or prevent carbon emissions as well as deliver economic, community and social benefits. This will result in a carbon-neutral shipment. All carbon credits are purchased in partnership with Cathay Pacific's Fly Greener programme.



TAKING CARE OF OUR PEOPLE

Safety is Swire Bulk's guiding principle, and the Company will never compromise on safety at sea or onshore. Swire Bulk works to ensure Zero Harm to employees, customers, contractors and the wider community. The Company's Operations Policy commits all personnel working at sea, in port and in the office to adhere to the principles of Zero Harm. Swire Bulk works with third-party ship management companies, partners and stakeholders to be the standard bearer for safety.

Seafarers

Swire Bulk strives to cultivate a strong safety culture on board by having robust reporting structures in place, and continuously sharing knowledge and incorporating best practices into work processes.

Swire Bulk uses the RightShip Safety Score to benchmark safety performance of the fleet. The Safety Score focuses on a vessel's operational history over the last five years and benchmarks each vessel against the world fleet. The output is a score out of five, where a vessel that has achieved a five out of five score indicates best practice attention to safety.

For the chartered-in fleet, Swire Bulk only selects vessels that meet the minimum requirements of a RightShip Safety score of three and above.

The average RightShip Scores of Swire Bulk vessels during 2023 were:

Owned vessels safety score: **4.8** (out of 5)

Chartered-in vessels safety score: **3.77** (out of 5)

Swire Bulk outsources ship management services to third parties. All subcontractors are carefully selected, following a thorough due diligence process before entering into contractual relationships with them. Currently two third-party ship managers are providing services to Swire Bulk and the Company ensures that safety is being managed as top priority.

Those third-party ship managers undergo the annual internal Document of Compliance audits and performed in compliance with the International Safety Management (ISM) Code. Any non-compliances must be resolved within three months, or earlier, as advised by the auditor concerned. Swire Bulk regularly reviews audit and inspection reports for all owned vessels.

All Swire Bulk owned and chartered-in vessels are International Labour Organisation (ILO) Maritime Labour Convention (MLC 2006) certified. This is periodically verified through annual internal audits and during external audits by classification societies recognised by Flag State.

The Company approved the installation of Starlink Satellite Communications across the owned fleet to provide high-speed global internet connectivity to seafarers. This will be rolled out in early 2024.

Owned Vessels Average RightShip Safety score

4.8 / 5.00



Swire Bulk Safety Statistics:

Near Miss Reports: **1,636**

LTIF per 1 million manhours: **0.98***

Fatalities: **0**

*There was an increase in Lost Time Injury Frequency (LTIF): from 0.33 in 2022 to 0.98 in 2023. In response, Swire Bulk is working with its third-party ship managers to implement measures to improve LTIF.



ZERO HARM

Behaving Safely. Always. Naturally.

Swire Bulk subscribes to Befrienders Worldwide, an international network of crisis helplines and multilingual hotline services. This is made available to shore-based employees, their dependents and seafarers (managed by the third-party ship manager) at no cost to the individuals. Employees are encouraged to use those helplines if they feel they may need assistance from an independent third party, and the initial reports and discussions are anonymous to Swire Bulk (note: only if repatriation is required, then the identity of the seafarer will have to be revealed for the office to be able to facilitate this). International Seafarers' Welfare and Assistance Network (ISWAN) is used by the second ship management company providing similar services to the seafarers managed by them.

Shore-based Employees

As part of the Company's commitment to provide a work environment that supports the safety, security and welfare of employees, a set of standards are in place that are relevant to onshore offices including having office safety committees and safety training workshops.

First aiders and fire wardens are in place with training and fire drill exercises conducted in preparation for any emergencies.

Swire Bulk recognises the importance of mental health and strives to support employees' wellbeing by creating positive work environments. In recognition of World Mental Health Day on 10th October 2023, Swire Bulk employees were given a mental health day to recharge and rejuvenate mind and body. The Flexible Work Arrangements policy was formalised to offer employees more flexibility in balancing their family, personal and work responsibilities.

Health and Safety, and Wellbeing / Welfare Committees are set up in global offices. They regularly organise a number of events ranging from walks and runs, yoga sessions and basketball games to bowling and other events to build team spirit and an environment that supports employees' mental and physical wellness.

There were more than 50 teambuilding and volunteering events organised throughout the year.



In April, Swire Bulk colleagues strapped on their running shoes to participate in races around the world. Two colleagues in Vancouver kicked off the events by taking part in the Vancouver Sun Run on 21st April 2023. A week later, 45 colleagues from Singapore and five members of the Miami office participated in the JP Morgan and Lexus Corporate runs.

In August, the Vancouver office employees spent a day fishing in Steveston, British Columbia. This is an annual team building event that brings people together to spend time outdoors. At the end of the day, the team came back with a great seafood harvest.

The Welfare Committee organised a Family Day for the Singapore office in September. Colleagues brought families to the office before heading off for an afternoon of activities of bowling, pool, karaoke, badminton and more.





Stevedores, Port Workers and Other Third-Party Contractors

Swire Bulk cares for the safety of both its own people and third-party contractors. Port Captains, when appointed, work closely with stevedores and cargo lashing providers to ensure that the safety culture extends beyond the vessel and is reiterated during cargo operations. Safety initiatives are implemented ranging from supplying missing Personal Protective Equipment to stevedores, to appointing local Port Captains to bridge language barriers. This helps Swire Bulk to further improve the safety of cargo operations on board vessels.

Cargo Safety

When it comes to handling cargo, the highest safety standards are applied. The safety of customers' cargo is of utmost importance for all dry bulk, breakbulk, parcelling or containerised cargo. Cargo care policies and Standard Operating Procedures—for the safe handling, proper stowage and securing of cargo as well as transportation, including for hazardous cargo shipment—are in place and required to be followed closely.

Human Rights and Labour Practices

Respecting human and labour rights and ensuring there is no modern slavery within Swire Bulk's business and wider supply chain is critical to the Company's sustainability. This includes ensuring that all employees receive proper instruction regarding their rights, and are in a position to seek immediate help if those rights are violated. Statutory benefits cover workers' basic needs, including healthcare, and have a full explanation in appropriate language.

Swire Bulk aims to be the Employer of Choice by treating people with respect and providing them with good and safe working conditions, equitable remuneration, and benefits. A Corporate Code of Conduct (CoC) and a Human Rights Policy are in place that address those issues.

Respecting human and labour rights and ensuring there is no modern slavery within Swire Bulk's business and wider supply chain is critical to the Company's sustainability.

Swire Bulk works with its third-party ship managers to ensure that all contractual conditions for seafarers are in full compliance with MLC 2006 requirements and wage standards are on par or above international or national Trade Union's Collective Bargaining Agreement such as the International Transport Federation's or Singapore Maritime Officer's Union and Singapore Organisation for Seafarers. Swire Bulk complies with the United Kingdom (UK) Modern Day Slavery Act 2015 (as amended 2021) and those of other jurisdictions, globally, where relevant. A Modern Slavery Policy is in place and annual statements can be found on the website.*

Swire Bulk has a whistleblowing procedure in place to report any issues related to labour practices and / or human rights. The third-party ship managers have their own procedures in place and Swire Bulk collects this information annually.

Four potential cases of harassment or discrimination were reported on board Swire Bulk vessels and were dealt with by third-party ship managers as they involved their seafarers, in accordance with established procedures. One case resulted in disciplinary action.

Delivering on Seafarers' Rights

The Sustainable Shipping Initiative, in partnership with the Institute for Human Rights and Business and RightShip, developed a self-assessment questionnaire for shipowners, operators, charterers and cargo owners to understand the extent to which current operations meet their seafarers' rights and welfare obligations.

The questionnaire provides practical guidance on meeting the Code of Conduct – *Delivering on seafarers' rights* and is based on international labour and human rights standards and principles. The Code of Conduct goes beyond the ILO MLC 2006 and focuses on the full spectrum of seafarers' rights and welfare, from fair terms of employment and crew protection to availability and appropriate management of grievance mechanisms.

Swire Bulk's third-party managers completed the self-assessments and obtained the Rightship badge.

*<https://swirebulk.com/sustainability/modern-slavery>

DEVELOPING AN ENGAGED WORKFORCE

Talent Attraction and Development

People are at the core of Swire Bulk's business operations. The Company is committed to providing a continuous learning environment where employees are empowered to reach their highest potential. The Company strives to attract highly skilled individuals, providing them with training and development opportunities to build a high-performing and engaged workforce.



Discretionary Training for Both Shore-Based Employees and Seafarers

Compliance training numbers are not included.



Training of seafarers is critical to maintaining and enhancing the safety of the seafarers working on board the Company's ships as well as the safety of Swire Bulk's operations. Training courses range from safety awareness and leadership, cargo handling and navigation together with a range of other soft skills and technical courses.

For shore-based employees, Swire Bulk offers flexible work arrangements for those who require flexibility due to family or other personal circumstances. It is recognised that employees have diverse needs and priorities, and Swire Bulk is committed to providing a conducive working environment to help everyone succeed. Remuneration is benchmarked against the industry level, and other additional benefits are offered to attract and retain employees.



With a strong focus on Swire values, organisational culture, diversity and inclusion, and sustainability, Swire Bulk is creating a welcoming, positive, innovative and high performing work environment. In 2023, the retention rate for shore-based employees dropped to 84.8% (from 90.2% in 2022, which still compares well with public benchmarks in the countries where Swire Bulk operates.

Long Service Awards

To thank employees for their long service and ongoing contributions to the business, Swire Bulk grants Long Service Awards. In 2023, seven awards were issued to employees ashore, for lengths of service ranging from 15 to 40 years.



Diversity and Inclusion

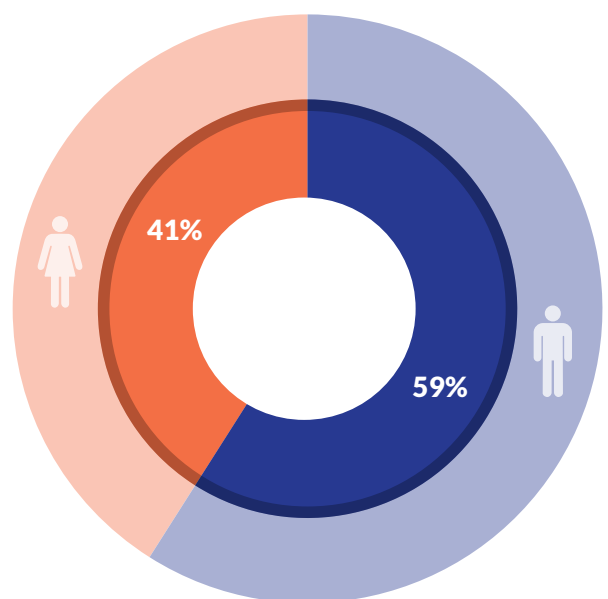
Swire Bulk values a multinational workforce and promotes an inclusive and diverse workplace. Evidence shows that diverse teams perform better. The Company ensures that the business offers the right conditions for all employees to thrive, regardless of gender, race, cultural or other differences. Swire Bulk is an equal opportunity employer in hiring and promotion practices, benefits and wages. Culture, gender and all other aspects of diversity are leveraged to build an inclusive culture, as different perspectives and experiences bring value to business.

In 2023, Swire Bulk had a total of 23 nationalities amongst shore-based employees. Through third-party ship managers, over 1,000 crew members of 12 different nationalities are employed on vessels.

41% of shore-based employees identified as female, while 59% of employees identified as male. Swire Bulk acknowledge that gender identity is a spectrum and there is a range of gender identities between and outside of the categories of male and female. The Company will address this in the coming years by offering employees the opportunity to identify beyond the binary gender categories.



Shore-based employees by gender identity



Female Male

Swire Bulk values a multinational workforce and promotes an inclusive and diverse workplace.



Shore-based Employees by Nationality

NORTH AMERICA 11

 Canada 5

 United States 6

EUROPE 34

 Denmark 3

 France 1

 Germany 15

 Greece 1

 Portugal 1

 Turkey 1

 United Kingdom 12


ASIA 75

 The Chinese Mainland 10

 Hong Kong SAR 1

 India 3

 Indonesia 1

 Japan 3

 Malaysia 9

 Philippines 2

 Singapore 44

 South Korea 2

SOUTH AMERICA 3

 Brazil 1

 Colombia 1

 Peru 1

AFRICA 2

 South Africa 2

OCEANIA 12

 Australia 12

Total
137

In 2023, Swire Bulk had a total of 23 nationalities amongst shore-based employees.

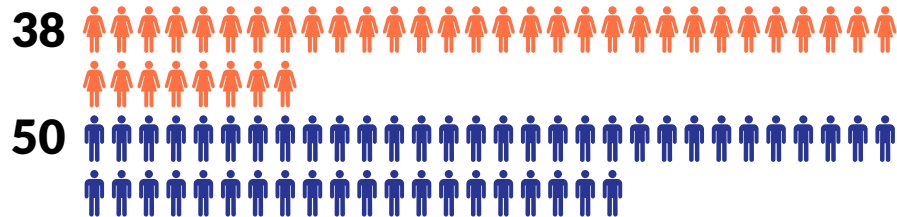
Age Composition of Shore-based Employees by Gender Identity

<30
years old



32
Total

30 - 50
years old



88
Total

>50
years old



17
Total

Note 1: Statistics do not include shared service employees employed by Swire Shipping Pte. Ltd.

Note 2: "Other" gender identity category was zero (through self identification).



Female

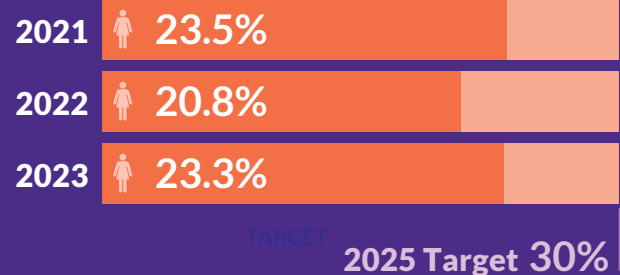


Male

Total 137



Senior Female Managers



Including the shared services*

*Shared services refer to the S&D Department providing services to both Swire Bulk and Swire Shipping

Swire Bulk has set a target of 30% senior female managers by 2025. At the end of 2023 there were 23.3% female senior managers (including the shared services*). There were three female members of the ELT.

There is a Diversity and Inclusion Policy, a Respect in the Workplace Policy, as well as a Corporate CoC; all of which further embed diversity and equality of treatment and opportunity into the Company's operations to ensure that all employees benefit from a welcoming, positive and innovative work environment, which is essential to Swire Bulk's continuing success. In addition to the policies and as noted earlier, a whistleblowing hotline is provided to deal with potential issues.

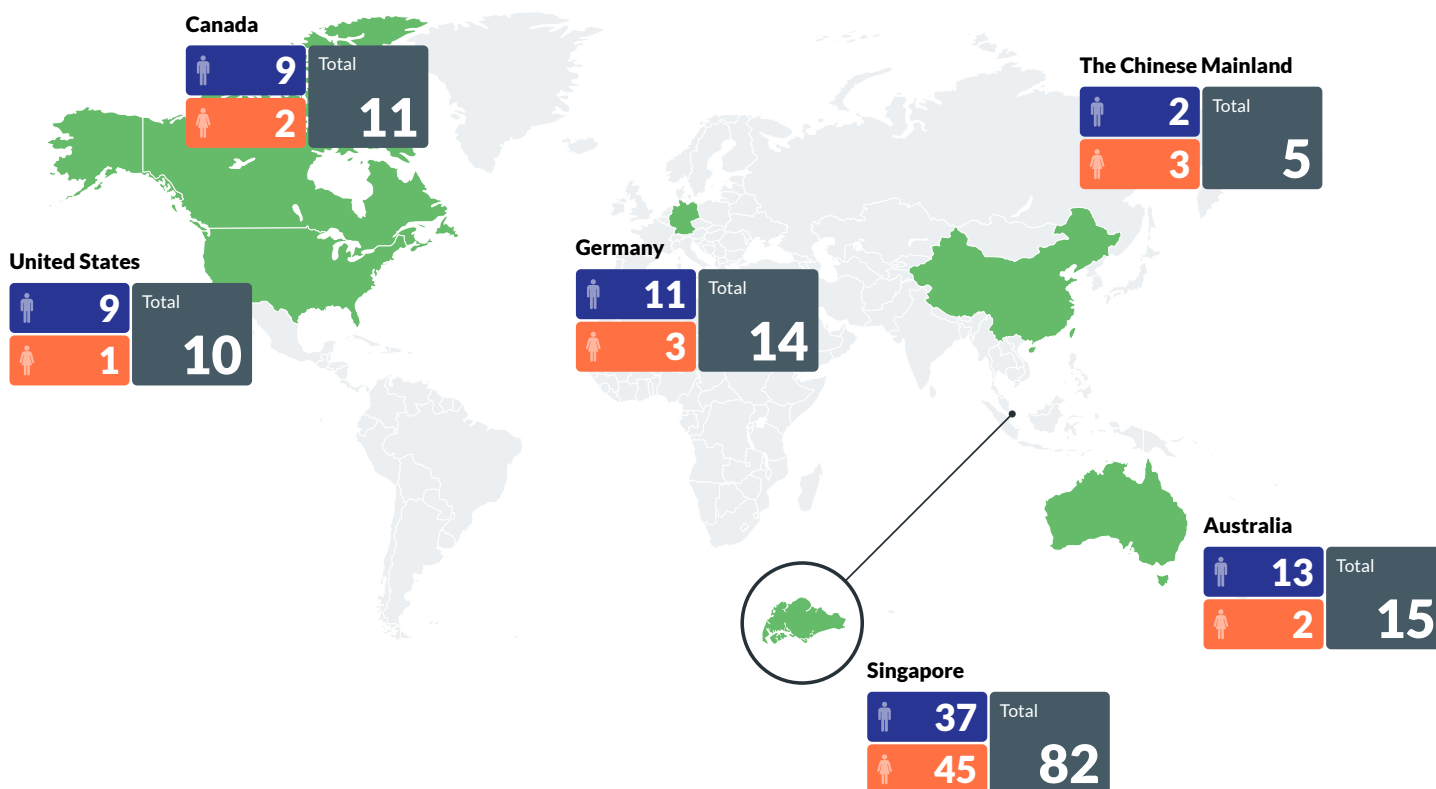
Swire Bulk is a member of WISTA in Singapore wherein female managers can attend industry networking and thematic events and share experience and insights. WISTA has a consultative status at the IMO.

*Shared services refer to the S&D Department providing services to both Swire Bulk and Swire Shipping.

As part of Company's commitment to celebrate diversity and to build an inclusive and progressive work environment, Swire Bulk has been celebrating Pink Friday over the last few years to promote a safe and supportive work culture for all employees. In 2023, the Company launched the voluntary use of gender pronouns to show support for the Lesbian, Gay, Bisexual, Transgender, Queer and other terms (LGBTQ+) community.

The Singapore office celebrated a Racial Harmony Day in July to remember the race riots that broke out in Singapore on the actual day in 1964. The day serves as a reminder that social division weakens society and shows a deeper appreciation of the importance of racial harmony, multiculturalism and social cohesion. On this occasion, an array of different snacks and drinks from various countries including Denmark, Japan, India and South Korea were served and colleagues were encouraged to learn more about the different nationalities that work at Swire Bulk.

Number of shore-based employees by gender identity and office location



SUPPORTING OUR COMMUNITIES

Swire Bulk believes in doing right by the communities where it operates and investing in worthy causes. The Company aims to support charities and community organisations as well as employees in need and is committed to establishing long-term, mutually rewarding relationships with partners and communities. This support for the communities focuses on education, health, youth, environment and biodiversity.

Swire Bulk allocates funding towards supporting key stakeholder communities in the various countries in which it operates. The Corporate Philanthropy fund is administered by the S&D Department.

In 2023, Swire Bulk has contributed to various charitable causes and fundraising initiatives that amounted to USD 123,511. 69% of this amount was directed to aid the seafarer community, including donations to The Missions to Seafarers (MtS) and Sailors' Society (SS). The balance of donations was directed towards various social causes, education and employee volunteering.

Swire Bulk employees spent a total of 533 hours supporting communities.



Swire Bulk believes in doing right by the communities where it operates and investing in worthy causes.

Supporting Seafarers

Seafarers are at the heart of maritime industry, and Swire Bulk is committed to provide better care to the 1.5 million men and women who support smooth sailing operations and global economy.

Swire Bulk supports seafarers through its partnerships with MtS and SS, who care for and support seafarers of all races, religions and ranks around the world. Support is provided through fundraising events and other collaborations. Both organisations provide much needed services to seafarers who visit their drop-in centres in ports as well as providing wellness programmes for seafarers and their families.

Swire Bulk was the Gold Sponsor of the **Adventure Race Japan 2023** organised by MtS. Representatives from across the global maritime community gathered in Japan's Izu Peninsula in May 2023 for a gruelling two-day challenge. The event was designed as a way for the international shipping community to support the seafarers who keep the global economy afloat, increase awareness and raise funding for seafarers' welfare support worldwide. Swire Bulk sent four teams to take part in the challenge. MtS raised a total of USD 1.3 million towards their work with seafarers globally.

Together with **MtS Vancouver**, Swire Bulk's Vancouver team organised a Christmas Gift Drive to pack 1,500 gift packs for seafarers who would come by the Port of Vancouver during the Christmas period. The team also donated to MtS Vancouver to aid the charity to help more seafarers in need.

Swire Bulk organised a **Strava Challenge** for employees globally to encourage them to run, walk and cycle. The Company pledged to donate a dollar for every kilometre employees logged in via the Strava platform to MtS Singapore.

A team of four adventurous climbers from Swire Bulk successfully conquered Mount Kilimanjaro as part of the **SS Kilimanjaro Challenge Climb 2023**. Participation in this event was a remarkable achievement and a testament to the team's dedication and perseverance, braving rough terrain and high altitudes to support a worthy cause. Funds raised will make a positive impact on the lives of seafarers worldwide, providing them with access to vital resources and services.

The Vancouver team participated in the third annual **Peak Challenge** on Grouse Grind Mountain, organised by the International SS Canada. This event was in celebration of the International Day of the Seafarer campaign, which focused on seafarers' contribution to protecting the marine environment. Swire Bulk's team clocked in an average timing between 50 minutes to 1 hour and 45 minutes over 2.9 kilometres, with an elevation of 853 metres on this trail.



Seafarers are at the heart of maritime industry, and Swire Bulk is committed to provide better care to the 1.5 million men and women who support smooth sailing operations and global economy.



Education

Support of the MaritimeONE Scholarship

Swire Bulk partners with the Singapore Maritime Foundation to support the growth of the maritime industry through investment in future talent. In 2023, the Company awarded a second scholarship (first one was awarded in 2022) to an undergraduate enrolled in Nanyang Technological University's Bachelor of Science (Honours), Maritime Studies programme in Singapore.

In addition to formal scholarships, the Company is committed to providing scholars with internship opportunities through on-the-job training and mentorship. Upon graduation, they will have an option to join Swire Bulk or the broader maritime industry.

MaritimeONE Case Summit

Swire Bulk sponsored a case challenge where participating teams had to create a framework or model to reduce vessels' non-sailing fuel use by at least 10% while at anchor, adrift or in port, and to suggest methods to minimise fuel use by improving operational performance.

Protecting the Environment and Biodiversity

Partnership with Endangered Species International, Philippines

Endangered Species International (ESI) has been actively restoring rainforest and rehabilitating habitats for endangered species and biodiversity at the Mt. Matutum Protected Landscape and Sarangani Bay Protected Seascape since 2008.

Swire Bulk partners with ESI to engage seafarers in biodiversity conservation activities. Under this partnership, seafarers act as volunteers and work in the field alongside ESI employees. ESI's activities include: conservation awareness and education, research, monitoring and reforestation; creation and management of protected areas; developing alternative livelihoods at the Mt. Matutum Protected Landscape; and a programme on mangrove and coastal reef conservation, management and rehabilitation in the Sarangani Bay Protected Seascape area.

A total of four trips were organised for Swire Bulk's volunteers in 2023.

Swire Bulk partners with Endangered Species International to engage seafarers in biodiversity conservation activities.

Environmental protection and conservation campaigns should be executed widely to educate more people. "Knowledge is power" and if we know how to care for our environment, we will have the power to protect our planet.

With proper education, more people will know not to dispose of their garbage and wastewater carelessly into the sea and cut back on illegal fishing and stop unsanctioned tree cutting. It is only through our collective efforts that we can protect our planet Earth.

Frederick Sicat, Second Officer

Employee Volunteering

Supporting local communities can also be a source of inspiration and motivation for employees. When individuals contribute time and resources to help others, it also strengthens their connection to these communities and helps with employee attraction and retention.

Swire Bulk spearheads meaningful community partnerships and corporate volunteering events for employees to learn and volunteer, and to raise awareness of the work of non-profit organisations and charities. Employees can get up to two days of volunteering work leave, which they can use for volunteering activities they do outside of work.

Various activities were held to give back to the community.

Swire Bulk's Singapore-based employees participated in an event held in partnership with Young Nautilus (Singapore). Volunteers gained valuable insights into the delicate balance within the intertidal zone and the influence of human activities on this fragile ecosystem.

Demonstrating their commitment to environmental stewardship, within three hours, the team collected 57 kilograms of waste along Changi Beach, which included plastic and glass amongst other debris.

On 23rd June 2023, to celebrate the Day of the Seafarer, Swire Bulk volunteers gathered to pack 300 goodie bags for seafarers. In collaboration with MtS Singapore, volunteers learnt about the needs and challenges faced by seafarers every day. Each gift pack included toiletries, a travel adaptor, snacks and handwritten messages. Two volunteers also boarded a docked vessel and personally delivered the gift packs to the seafarers.

Another corporate volunteering event was done in partnership with City Sprouts (Singapore). City Sprouts' mission is to rejuvenate urban spaces and turn them into thriving city farms. Volunteers learnt basic gardening techniques such as pruning and weeding, composting and about edible local herbs. Participants also propagated mint, which was donated to a local charity when harvested.



Swire Bulk spearheads meaningful community partnerships and corporate volunteering events for employees to learn and volunteer, and to raise awareness of the work of non-profit organisations and charities.

EMBEDDING RESPONSIBLE BUSINESS

Ethical Business Conduct

Ethical business conduct and responsible business practices have converged. Corruption is increasingly viewed as much a human rights risk as it is a governance issue, and the basic expectation is that whistleblowing procedures are a part of Standard Operating Procedures. Various previously 'soft' laws or norms on corporate responsibility have been translated into hard laws. For example, provisions of the UN Guiding Principles on Business and Human Rights (The "Ruggie" Principles) are incorporated in modern slavery legislation, and anti-bribery and anti-corruption are now firmly established as a legal compliance requirement.

Swire Bulk is committed to act with integrity, transparency and accountability with high standards of business ethics and corporate governance, including zero tolerance towards any corrupt practices. This includes curtailing the practice of facilitation payments, as well as conducting due diligence on the ethical record of transactional partners, including customers and suppliers. The Corporate Code of Conduct (CoC) is the Company's main governance document, which together with other policies and procedures, sets strong foundations on how operations are conducted.

The Corporate CoC, together with internal controls, sets a strong foundation to prevent any corruption and anti-competitive / anti-trust behaviours. The Company carries out training for all employees testing their understanding of these principles and how they apply to employees' daily work / duties.



Governance compliance training is held annually for existing employees and is part of the induction programme for new employees. 100% of employees completed this training in 2023.

This governance compliance training programme covers:

- Corporate CoC;
- Global Anti-Bribery;
- Global Anti-Trust;
- Workplace Harassment Prevention;
- Modern Slavery;
- Cyber Security Awareness; and
- EU General Data Protection Regulation (GDPR) and Singapore Personal Data Protection Act (PDPA) (for specific employees / functions).

*** Based on the UK Act, but applicable to all operations globally.**

This training is held annually for existing employees and is part of the induction programme for new employees. 100% of employees completed this training in 2023.

Any and all incidents of potential or actual non-compliance are reported to both the ELT and Audit Committee, and are investigated. The Audit Committee is chaired by the CEO and meets quarterly.

Corruption hinders economic, social and political development and progress. Swire Bulk's Anti-Bribery and Corruption Policy sets out the standards of behaviour expected from Swire Bulk employees and outlines the relevant compliance procedures adopted by the Company.

The shipping industry is inherently vulnerable to corruption due to the global nature of operations and interactions with authorities in ports around the world. Swire Bulk has a zero-tolerance policy towards bribery and corruption and adheres to the UK Bribery Act. There were zero legal proceedings associated with bribery or corruption in 2023.

Swire Bulk is a member of MACN and takes a strong stance against corruption, refusing any requests for facilitation payments on board owned and managed vessels. Any requests for small items, ranging from cigarettes to alcohol and soft drinks etc., are being recorded and reported to MACN. There were 672 requests reported during the reporting period. No cash payments were made.

Swire Bulk was not involved in any legal actions for anti-competitive behaviour, anti-money laundering, anti-trust or monopolistic practices, and thus no sanctions, financial or otherwise, were imposed in 2023.

In 2023, a total of eight grievances were reported using the whistleblowing or confide channels. One was unsubstantiated and seven cases were addressed by the relevant third-party ship management companies, as they involved their seafarers, in accordance with the established procedures.

Supply Chain Management

The past decade has seen growing expectations for consumer-facing organisations to disclose information about how and where their products and materials are sourced from, and the impact on the whole value chain, driving full supply chain transparency and reporting initiatives. Customers, charterers and shipowners now regularly conduct due diligence on suppliers and supply chain partners to meet these expectations.

A growing number of companies are introducing strategic supplier engagement programmes with a focus on sustainability. Many trading companies are differentiating their services by building the sustainability capacity of actors across the supply chain and offering assurance to their customers. These programmes seek to cover environmental and social risks associated with transport and logistics services, including shipping.

Swire Bulk aims to build stronger partnerships with partners and suppliers and ensure that they adhere to the same high ESG standards. Through understanding supply chain risks, conducting due diligence on suppliers and supply chain partners, Swire Bulk is committed to taking action to ensure that its supply chain is fully compliant with any regulatory, environmental and health and safety requirements as well as being free of human rights violations and modern slavery. All suppliers with a contractual agreement are required to follow the Company's Supplier CoC.

A framework for identifying critical suppliers was established, reflecting operational risks. The framework allows for segmentation of suppliers based on supply chain risks, which were determined by applying Transparency International's Corruption Perception Index, Global Slavery Index's Vulnerability score, country-level risks as well as business leverage insights to determine critical suppliers.

Building on the assessment of critical suppliers, the existing supplier sustainability self-assessment questionnaire was further enhanced. This questionnaire is intended to be used as part of the framework for assessing critical suppliers.

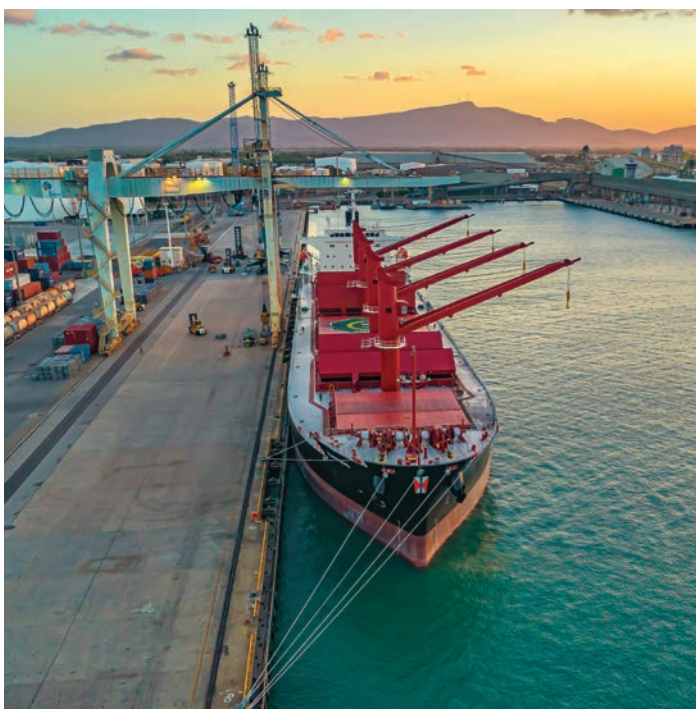
Technical management services are outsourced to third parties. All subcontractors are carefully selected, following a thorough due diligence process, prior to entering any contractual agreement, which includes undertaking background checks during the tendering exercise. The third-party ship management companies are audited annually by Recognised Organisations (RO) appointed by the flag states in compliance with ILO MLC 2006 requirements.

Third-party ship managers use several manning agencies in various countries around the world. Audits on the manning agencies are conducted internally by the appointed third parties and externally by RO in compliance with the ISM Code. Any non-compliances must be resolved within three months, or earlier, as advised by the auditor concerned. Swire Bulk regularly reviews all audit and inspection reports for all owned vessels.

For the chartered-in fleet, Swire Bulk only selects vessels that meet the requirements to achieve a RightShip Safety score of three and above. RightShip assesses and maintains the vetting status of all vessels subject to overall safety and operational performance in the last five years.

Swire Bulk has developed and piloted a new ESG self-assessment for chartered-in vessels. This assessment will be rolled out to the chartered-in fleet in 2024.

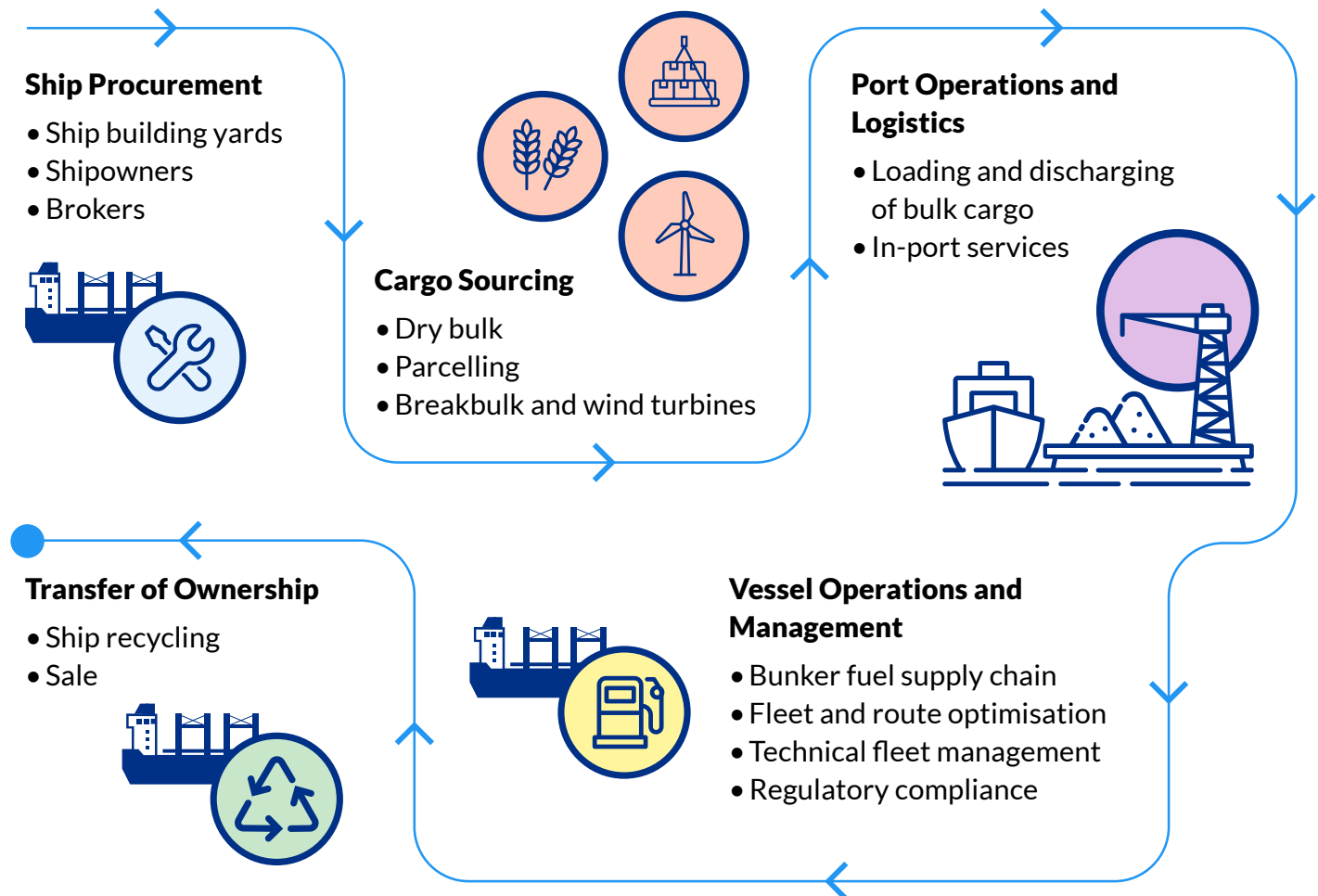
Swire Bulk remains committed to being a leader in sustainability and supporting customers' ambitions of having sustainable supply chains.



Swire Bulk aims to build stronger partnerships with partners and suppliers and ensure that they adhere to the same high ESG standards.

Value Chain and Value Creation

Swire Bulk's value chain consists of five main components:



Swire Bulk ensures timely, reliable delivery of bulk cargo by optimising voyage planning, fleet management and port operations. Robust customer support provides enhanced experiences by meeting diverse customer needs and fostering long-term relationships.

The Company has significantly improved fuel efficiency and reduced emission intensity, staying committed to decarbonising its operations and minimising overall environmental impacts.

Swire Bulk's commitment to safety and seafarer welfare aligns with broader social goals of promoting fair labour practices and safety in the maritime industry.

Overall, Swire Bulk's integrated approach to its value chain activities ensures that it delivers high-quality services, supports societal wellbeing and protects the environment, thereby creating value for all its stakeholders.

EcoVadis Sustainability Rating

Swire Bulk holds a Silver Medal for its sustainability efforts from EcoVadis. The Company was judged to be in the top 16% within the Sea and Coastal Water Transport sector of companies rated by EcoVadis.





Physical Security

Safety is the top priority for Swire Bulk and the Company takes all related risks seriously. Security has been identified as a material issue for the business in addition to legal requirements.

The primary threat to any vessel is a criminal boarding. Therefore, physical security of vessels is paramount to ensure all seafarers are protected adequately from any physical threats of boarding by possible perpetrators. This threat is ever-evolving, and Swire Bulk is actively working with relevant government and private agencies to ensure up-to-date and immediate information regarding any attacks or threats within any region is communicated on board and ashore.

All seafarers are continuously reminded to ensure that they maintain effective lookouts conduct security drills regularly, and ensure all possible threats are treated with the utmost importance.

Placement of security guards on board is mandatory when the vessel is contractually bound to transit through high-risk areas such as Gulf of Aden (Indian Ocean). Owned vessels are not permitted to transit specified high-risk areas or call at designated "high-risk ports" in the Gulf of Guinea and other areas of West Africa due to the high risk of piracy. Traffic light indicators are used to assess the risk based on routine assessment of piracy attacks in the West African region to guide the commercial team when fixing vessels' employments.

Swire Bulk is also closely monitoring the situation in the Red and Black Sea areas and any other hot spots globally as they arise. A thorough risk assessment is done prior to accepting any sailings through or close to conflict areas, with safety for the seafarers being the top priority of the Company.

All seafarers are reminded constantly to ensure that they maintain effective lookouts, conduct security drills regularly, and ensure all possible threats are treated with the utmost importance.

Data Privacy and Cybersecurity

Swire Bulk has identified "Data Privacy and Cybersecurity" as a material topic for the business and takes very seriously any risks associated with control and management of data privacy and protection.

Information Security and IT System Governance Policies are in place, and the importance of cybersecurity is recognised. For the owned fleet, this is addressed by the third-party ship management companies who have cybersecurity protocols in place.

Information security risk assessments are performed for all information systems on a regular basis to identify key information risks and determine the controls required to keep those risks within acceptable limits.

Swire Bulk also values the privacy of the personal data collected from employees, customers, suppliers and partners (and each of their employees, officers, agents, contractors or any other individuals they engage with) and are committed to protecting the privacy and security of all personal data in accordance with applicable data protection legislations.

The Data Protection and Privacy Policy together with the Employee Data Protection Policy and Employee Data Handling Policy, outline how personal information is being collected, used, retained and disclosed. Data subject access rights and complaint procedures are clearly stated. A Data Governance Committee and a Data Protection Officer are in place to ensure due diligence measures are implemented and actions are taken as required by the applicable data protection legislation.

The Company is committed to providing relevant education and training to users to ensure they understand the importance of information security and appropriate care when handling confidential information. All employees must complete cyber security awareness training and EU GDPR and Singapore PDPA training (for specific employees / functions) and pass an online assessment as part of the governance compliance training programme.

There were no notifiable data breaches or cybersecurity incidents in 2023.

ANNEXES

Annexes

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SASB Index

Marine Transportation Industry Standard

Topic	Accounting Metric	Unit of Measure	Data for 2021	Data for 2022	Data for 2023	SASB Code
Greenhouse Gas Emissions	CO ₂ Emissions ¹					
	Gross global Scope 1 emissions	Metric tonnes CO ₂ e	1,531,020.37	1,212,065.43	1,227,464.01	TR-MT-110a.1
	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets		See pages 16-17 2021 Report	See pages 4, 15-17 2022 Report	See pages 4, 14-16 of this report	TR-MT-110a.2
	Energy Consumed ²					
	(1) Total energy consumed	Gigajoules (GJ)	(1) 19,771,545.39	(1) 15,649,331.97	(1) 15,934,875.75	TR-MT-110a.3
	(2) percentage heavy fuel oil	Percentage (%)	(2) 92.25%	(2) 90.04%	(2) 90.86%	
	(3) percentage renewable		(3) 0%	(3) 0%	(3) 0%	
EEDI						
	Average Energy Efficiency Design Index (EEDI) for owned ships	Grammes of CO ₂ per tonne-nautical mile	BD40 - 4.7 Imabari - 5.5 Oshima - 4.6 Hakodate - 5.4	BD40 - 4.7 Imabari - 5.5 Oshima - 4.6 Hakodate - 5.4	BD40 - 4.7 Imabari - 5.5 Oshima - 4.6 Hakodate - 5.4	TR-MT-110a.4

*Disclaimer and Assumptions for the SASB Disclosures

- Gross global Scope 1 emissions: covers CO₂e emissions (metric tonnes CO₂e). Calculations are based on the "Formulae for the calculation of greenhouse gas emissions" under Annex I of the Commission Delegated Regulation (EU) 2023/2776 for bunker consumption and UK DEFRA Conversion factors for office vehicular petrol and diesel consumption. The operational control approach defined by the GHG Protocol has been applied (Scope 1). This includes all operated vessels, based on fuel consumption for the year and office vehicular petrol and diesel.

Gross global Scope 1 emissions and Energy Consumed have been restated (after reviewing prior year calculations) to ensure consistency and enable comparability between reporting periods.

- Total energy consumed: calculated based on available data from fuel purchases, using the fuel properties defined by UK DEFRA, conversion factors, 2022 – note that properties concerning bunker fuel oil were obtained from the Commission Delegated Regulation (EU) 2023/2776. The figure includes all operated vessels and covers Scope 1 emissions.

Heavy fuel oil constitutes IFO, LSIFO and VLSFO.

SASB Index

Marine Transportation Industry Standard

Topic	Accounting Metric	Unit of Measure	Data for 2021	Data for 2022	Data for 2023	SASB Code
	Other Emissions to Air ³					
Air Quality	(1) NO _x (excluding N ₂ O)	Metric tonnes	(1) 37,613.72	(1) 29,389.85	(1) 29,908.9	TR-MT-120a.1
	(2) SO _x		(2) 5,419.57	(2) 3,985.03	(2) 3,783.3	
	(3) particulate matter (PM10)		(3) 3,006.57	(3) 2,332.73	(3) 2,380.2	
	Shipping Duration in Marine Protected Areas ⁴					
Ecological Impacts	Shipping duration in marine protected areas or areas of protected conservation status	Number of travel days	1,943.81	1,318.27	1,289.29	TR-MT-160a.1
	Percentage of Fleet Implementing Ballast Water					
	(1) Exchange	Percentage (%)	100%	100%	100%	TR-MT-160a.2
(2) treatment	100%		100%	100%		
	Spills and Releases to the Environment					
	(1) Number	Number	0	0	0	TR-MT-160a.3
	(2) aggregate volume	Cubic meters (m³)	0	0	0	
	Lost Time Incident Rate ⁵					
Employee Health & Safety	Lost time incident rate (LTIR)	Rate	Offices - Nil Vessels - 0.17	Offices - Nil Vessels - 0.33	Offices - Nil Vessels - 0.98	TR-MT-320a.1

***Disclaimer and Assumptions for the SASB Disclosures**

- NO_x, SO_x and PM emissions: emissions from the combustion of fuels from all operated vessels. Calculations are based on the following sources:
For SO_x - The methodology has been updated to align with internal reporting methodology. Formula used is kgSO_x = kg fuel * 2 * 0.97753 * (Sulphur content of fuel burnt / scrubbed) / 100. Assumes 97.753% of sulphur in fuel is converted to SO_x, factor 2 reflects molecular weight of SO₂ to sulphur as vast majority of SO_x is SO₂ for vessel emissions. Sulphur content is 0.5% m/m even for vessels with scrubber due to emission ratio limit of 21.7. Source: *StormGeo conversion factors*
For NO_x - assumed 84%, 6% and 10% of IFO / LSIFO consumed at sea, in harbour and in port respectively, and 18%, 30% and 52% of MGO / LSGO consumed at sea, in harbour and in port respectively.
Source: *European Commission (2002) "Quantification of emissions from ships associated with ship movements between port in the EC"*
For PM - Eyring, V., et al., *Transport impacts on atmosphere and climate: Shipping, Atmospheric Environment (2009)*
Scope includes all operated vessels, including chartered-in vessels.
- Shipping duration in marine protected areas: includes times in Sulphur Emission Control Area zones. Scope: all owned vessels.
- Lost Time Incident Rate (LTIR): The rate is calculated based on (Lost Time Incidents) / (1,000,000 hours worked), and includes incidents resulting in absence from work beyond the date or shift when it occurred. Scope: all owned vessels.

SASB Index

Marine Transportation Industry Standard

Topic	Accounting Metric	Unit of Measure	Data for 2021	Data for 2022	Data for 2023	SASB Code
Business Ethics	Corruption Index					
	Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	Number	2	1	0	TR-MT510a.1
	Corruption					
	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	Reporting currency	0	0	0	TR-MT-510a.2
Accident & Safety Management	Marine Casualties					
	Marine casualties	Number	0	0	0	TR-MT-540a.1
	Very serious marine casualties	Percentage (%)	0%	0%	0%	
	Conditions of Class					
	Number of Conditions of Class or Recommendations ⁶	Number	0	0	0	TR-MT-540a.2
	Port State Control					
	(1) Deficiencies (2) detentions	Number	(1) 81 (2) 2	(1) 57 (2) 0	(1) 32 (2) 0	TR-MT-540a.3

*Disclaimer and Assumptions for the SASB Disclosures

6 Conditions of Class or Recommendations are understood to be interchangeable terms, defined as requirements imposed by the competent authorities that are to be carried out within a specific time limit in order to retain vessel Class. Please note that only conditions of class that led to the withdrawal, suspension, or invalidation of a vessel's Class Certificate are accounted for in this report. There were zero such incidents during the period covered by this report.

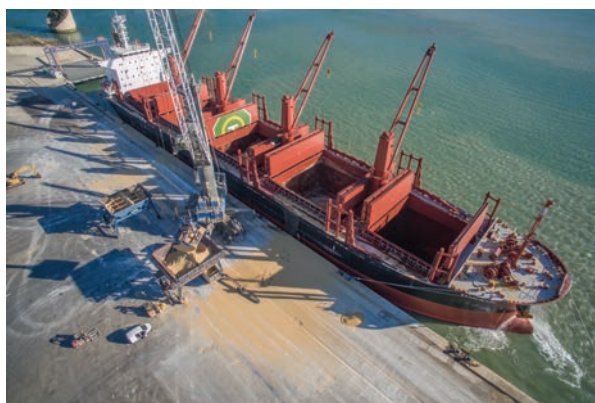
SASB Index

Marine Transportation Industry Standard

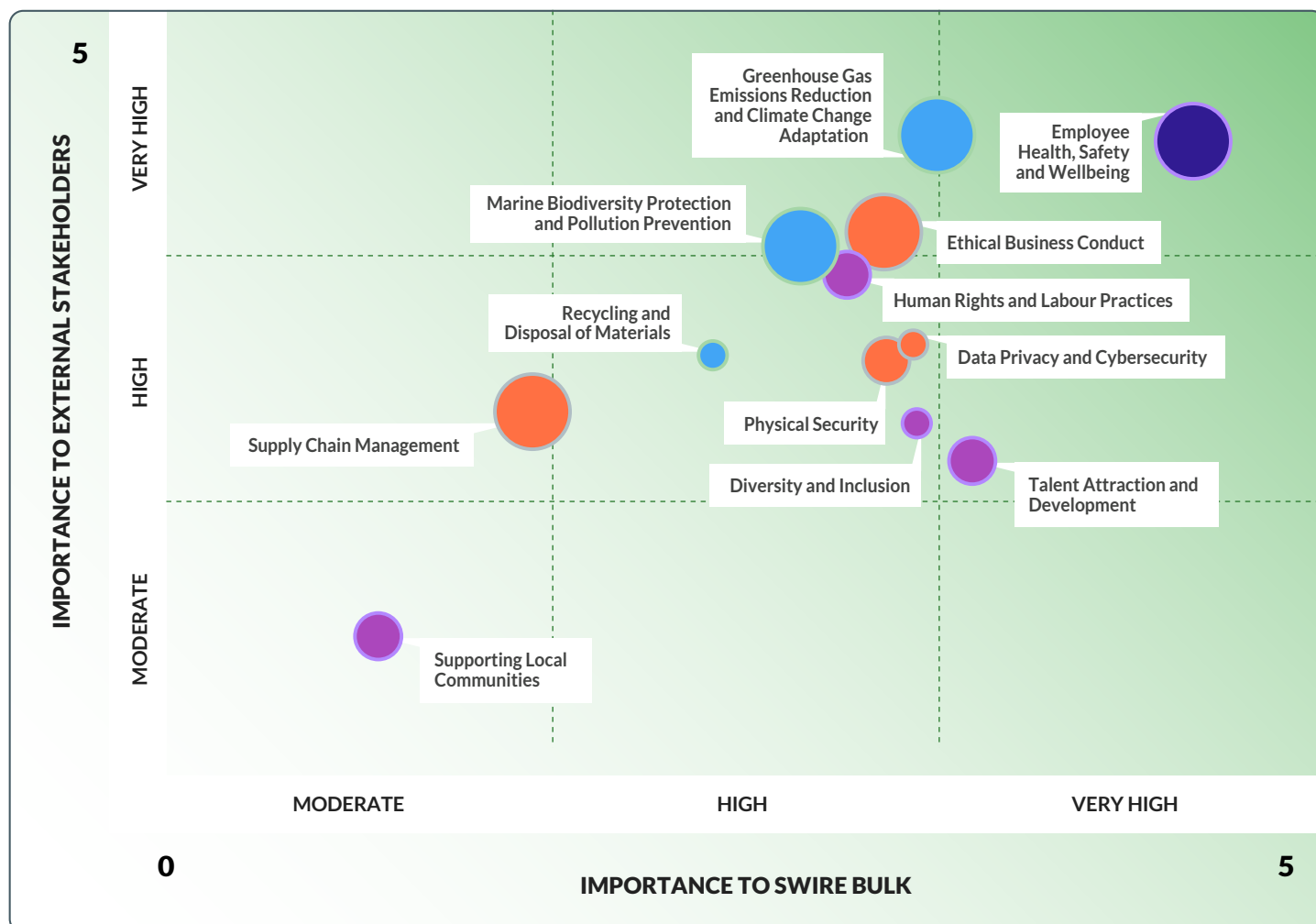
Topic	Activity Metric	Unit of Measure	Data for 2021	Data for 2022	Data for 2023	SASB Code
Marine Transportation Activity Metrics						
	Number of shipboard employees ⁷	Number	660	580	460	TR-MT-000.A
	Total distance travelled by vessels ⁸	Nautical miles (nm)	6,233,557	5,068,192	5,251,903	TR-MT-000.B
	Operating days ⁹	Days	54,001	42,194	43,961	TR-MT-000.C
	Deadweight tonnage	Thousand dead-weight tonnes	17,952	14,090	18,229	TR-MT-000.D
	Number of vessels in total shipping fleet	Number	366	309	405	TR-MT-000.E
	Number of vessel port calls ¹⁰	Number	2,712	2,991	3,027	TR-MT-000.F
	Twenty-foot equivalent unit (TEU) capacity	TEU	Not applicable	Not applicable	Not applicable	TR-MT-000.G

***Disclaimer and Assumptions for the SASB Disclosures**

- 7 Number of shipboard employees: this figure represents the typical count of crew on board the fleet at any given time, based on standard crew complement. It does not reflect the aggregate number of individual crew members who have worked on board during the year. Scope: owned vessels only.
- 8 Total distance traveled: the distance (in nautical miles) travelled by all operated vessels during the calendar year, covering both ballast and laden legs.
- 9 Scope for TR-MT-000.C to TR-MT-000.F covers all operated vessels throughout the calendar year.
- 10 Number of vessel port calls: Total number of port calls for the entire operated fleet during the reporting period.



MATERIALITY MATRIX



LEGEND

Impact of issue on
environment and society

- Major impact
- Moderate impact
- Minor impact

- **Environment**
- **Social**
- **Governance**

The materiality matrix shows the relative priority of topics based on the importance to the business (X axis) and the importance to external stakeholders (Y axis). The impact of the issues on the environment and society is represented by the size of the spheres, ranging from major to minor.

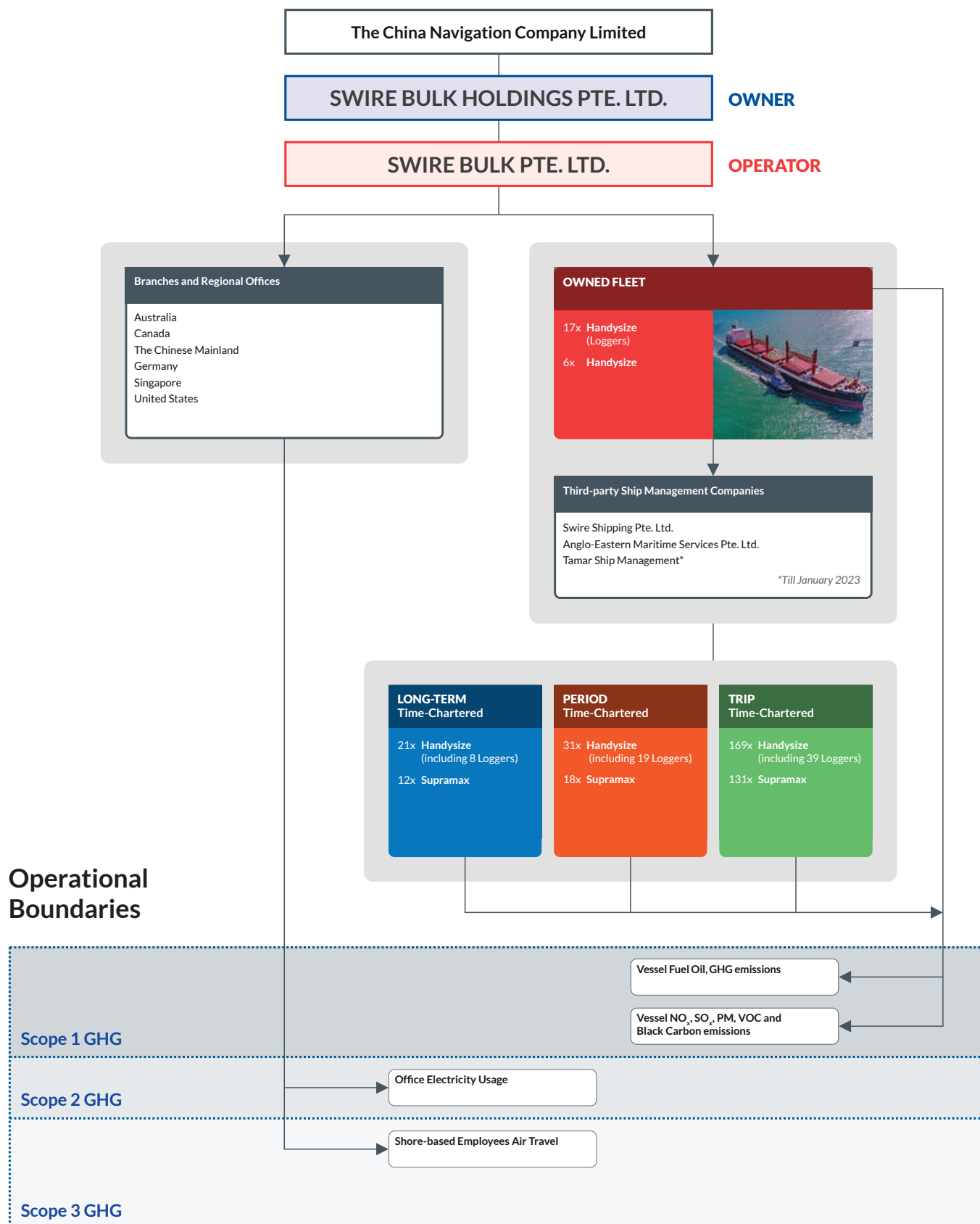
This report has been written to cover Swire Bulk's material topics divided into three sections: Environment, Social and Governance. The impact of the issues on the environment and society is represented by the size of the spheres, ranging from major to minor.

MATERIAL TOPICS

TOPIC DEFINITION

ENVIRONMENTAL TOPICS	
GHG Emissions Reduction	Putting measures in place to reduce greenhouse gas (GHG) emissions, including SO ₂ and NO _x , by implementing energy efficiency measures, adopting new technologies and using alternative fuels.
Climate Change	Managing physical and transition climate change risks and opportunities.
Marine Biodiversity Protection and Pollution Prevention	Minimising negative impacts to the health and biodiversity of marine ecosystems and marine life, through the responsible management of vessel speed, discharge, hull coating and prevention of spills / leakages.
Recycling and Disposal of Materials	Minimising waste and ensuring the safe disposal of hazardous materials, including sustainably recycling ships at the end of their economic lives.
SOCIAL TOPICS	
Employee Health, Safety and Wellbeing	Ensuring a high level of health, safety and wellbeing for its employees and other stakeholders.
Diversity and Inclusion	Fostering a diverse and inclusive workforce through non-discrimination and promotion of equal opportunities.
Talent Attraction and Development	Attracting highly-skilled individuals, providing training and development opportunities to build a high-performing and engaged workforce.
Human Rights and Labour Practices	Respecting human and labour rights and ensuring there is no modern slavery within the business and supply chain.
Supporting Local Communities	Supporting key stakeholder communities in countries where it operates, including strategic philanthropy / community investment, charitable donations, disaster relief and fundraising efforts.
GOVERNANCE TOPICS	
Ethical Business Conduct	Upholding the highest standards of ethical business conduct, including measures to promote anti-corruption and fair competition, and curtail the practice of facilitation payments.
Physical Security	Adopting proper measures to prevent piracy attacks and ensuring the safe operation of ships.
Data Privacy and Cybersecurity	Ensuring data protection and privacy, and safeguarding business systems against cybersecurity threats.
Supply Chain Management	Mitigating the regulatory, environmental and social risks in the supply chain through responsible procurement practices.

ORGANISATIONAL BOUNDARY DIAGRAM



Number of vessels and Scope 1 emissions include chartered-in tonnage. Chartered-out tonnage is excluded from this boundary and report. For chartered-in tonnage, the number reflects vessels operated over the calendar year.




Chartered-in tonnage is defined as follows:

1. Long-term Time-Charter: vessels chartered-in for over one year.
2. Period Time-Charter: vessels chartered-in for multiple legs up to one year.
3. Trip Time-Charter: vessels chartered-in for a single leg only.




PROGRESS AGAINST UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

SDG	Relevant Material Topics	Relevance to Swire Bulk's operations / Progress over 2023 calendar year
	<p>Employee Health, Safety and Wellbeing</p> <p>Physical Security</p>	<ul style="list-style-type: none"> • Zero Harm to employees, customers, contractors, and the wider community as top priority • Operations Policy / Labour practices / Employee welfare and benefits • Enhancing the approach to safety through promoting Zero Harm campaigns • Cargo operations and port community safety measures • Respect in the Workplace Policy • Partnering with Befrienders Worldwide • Health and Safety, and Wellbeing / Welfare Committees • Flexible Working Arrangements Policy
	<p>Diversity and Inclusion</p> <p>Human Rights and Labour Practices</p> <p>Talent Attraction and Development</p>	<ul style="list-style-type: none"> • Diversity and Inclusion Policy and Respect in the Workplace Policy • Diversity and Inclusion target: 30% female senior managers by 2025 • Workplace Harassment prevention training module • Grievance mechanism • Flexible working arrangements • Unconscious bias training for managers • Gender neutral employee attraction and retention policies and procedures • Use of gender pronouns • Equality in pay structures and rewards • Good and safe working conditions • Supporting women in maritime • Membership of WISTA (Singapore chapter) • Confidential reporting hotline
	<p>GHG Emissions Reduction and Climate Change Adaptation</p>	<ul style="list-style-type: none"> • Decarbonisation through exploring alternative fuel options / R&D into alternative energy sources and EETs • Initiatives to improve fuel efficiency / Fleet Efficiency team in place • Use of performance management system on the vessels • Internal fleet efficiency KPI scorecard • KPIs for reducing EEOI • Reporting environmental performance • Renewable electricity target for offices • Eco-office / green office practices • Member of <i>Getting to Zero</i> 2030 Coalition, MMMCZCS, GCMD, SSI
	<p>Employee Health, Safety and Wellbeing</p> <p>Diversity and Inclusion</p> <p>Human Rights and Labour Practices</p> <p>Supply Chain Management</p> <p>Talent Attraction and Development</p> <p>Ethical Business Conduct</p>	<ul style="list-style-type: none"> • Inclusive labour practices across all countries of operation • Good and safe working conditions • Investment in training and development • Equal pay for work of equal value • MLC 2006 compliance • Diversity and Inclusion Policy and Respect in the Workplace Policy • Health & Safety standards • Whistleblowing Policy / Third-party due diligence • Modern Day Slavery assessments and published statements • Supply chain management • Corporate and Supplier CoC / Supplier audits • Strong governance, compliance training, grievance reports

PROGRESS AGAINST UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

SDG	Relevant Material Topics	Relevance to Swire Bulk's operations / Progress over 2023 calendar year
	Diversity and Inclusion Talent Attraction and Development Supporting Local Communities	<ul style="list-style-type: none"> • Diversity and Inclusion Policy and Respect in the Workplace Policy • Workplace Harassment prevention training module • Grievance mechanism • Equality in pay structures and rewards • Unconscious bias training for managers • Good and safe working conditions • Modern slavery assessments and statements • Investment in training and development • Leadership development programmes • Community investment projects in key stakeholder communities
	Recycling and Disposal of Materials Supply Chain Management	<ul style="list-style-type: none"> • Environmental policy and practices • Hazardous materials management practices and disposal • Sustainable Ship Recycling Policy and practices • Transparent S&D reporting in accordance with SASB Standards • Supplier CoC • Sustainably Produced Food Policy • Supply chain risk assessments and audits • Framework for identifying critical suppliers • Sustainable Office Guidelines • Single-Use Plastic reduction targets • ESG self-assessments for chartered-in vessels
	GHG Emissions Reduction and Climate Change Adaptation	<ul style="list-style-type: none"> • Decarbonisation Roadmap and targets • Renewable electricity target for offices • Young fleet of modern, fuel efficient / environmentally responsible vessels • Voyage triangulations in key markets to reduce CO₂ emissions • Initiatives to improve fuel efficiency / Fleet Efficiency team in place • Innovation fund to trial / pilot novel EETs • Decarbonisation Manager in place • Use of performance management system on vessels • Offsetting carbon emissions and SailGreener • Monitoring the GHG emissions for each vessel on both per voyage and annual basis • Investigating alternative energy sources • Memberships of <i>Getting to Zero</i> 2030 Coalition, MMMCZCS, SSI • Publicly reporting environmental performance via Sustainability reports • Internal fleet efficiency KPI scorecard • KPIs for reducing EEOI performance • Eco-office / sustainable office practices, Zero Carbon / Zero Waste Events

PROGRESS AGAINST UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

SDG	Relevant Material Topics	Relevance to Swire Bulk's operations / Progress over 2023 calendar year
	Marine Biodiversity Protection and Pollution Prevention	<ul style="list-style-type: none"> • Biodiversity Policy / Investment in new technologies • Custom-built Container with HME filter for cleaning cargo holds • Membership of World Ocean Council • BIC and BAP manuals in place • Anti-fouling paint application (owned vessels) • Safe ship recycling practices minimising release of hazardous chemicals into the water • Compliance with the IMO Ballast Water Management Convention • Single-Use Plastic reduction targets • ECHO programme led by Vancouver Fraser Port Authority • Port of Long Beach's Green Flag programme • Blue Whales and Blue Skies Vessel Speed Reduction incentive programme in California • Deviating vessels from the Southern waters of Sri Lanka to protect endangered whales
	Ethical Business Conduct Supply Chain Management Data Privacy and Cybersecurity Physical Security	<ul style="list-style-type: none"> • Strong Governance, Compliance training covering Corporate CoC / Anti-Bribery / Antitrust • VIVE Sustainable Supply Programme Award • EcoVadis Sustainability Rating • Whistleblowing Policy / Third-party due diligence • Sanctions checks • Membership of MACN • Privacy Policies, procedures and training • Cybersecurity training / EU GDPR and Singapore PDPA training for employees • Supplier CoC in place • Supply chain risk assessments and self-audits • Framework for identifying critical suppliers • ESG self-assessments for chartered-in vessels
	GHG Emissions Reduction and Climate Change Adaptation Supporting Local Communities	<ul style="list-style-type: none"> • Stakeholder engagement at international fora • Memberships of <i>Getting to Zero</i> 2030 Coalition, MMMCZCS, SSI, World Ocean Council • Partnerships with universities, research institutions and non-governmental organisations • Corporate philanthropic investments in key stakeholder communities

Assurance Statement

Swire Bulk Pte. Ltd. (Swire Bulk) commissioned Copeland & Partners Ltd. (CPL) to conduct limited independent assurance of the Accounting and Activity Metrics for each Sustainability Disclosure Topic of SASB's Marine Transportation Industry Standard disclosed in its 2023 Sustainability Report, in accordance with the scope outlined below.

CPL's responsibility for this assignment was only to Swire Bulk and CPL denies any liability or responsibility to others. It is the responsibility of Swire Bulk to collect, analyse and present all data and information to address: the Accounting and Activity Metrics for the Disclosure Topics specified by the Industry Standard in the SASB Index, including the guidance of the relevant Technical Protocols; related content within the Sustainability Report; and to sustain operative governance and internal controls over the processes and systems from which the report is derived. Ultimately, the report has been approved by, and remains the responsibility of Swire Bulk.

Objective and Scope

The objective of the assurance process was to determine Swire Bulk's conformance to the requirements of the Industry Standard for the Accounting and Activity Metrics disclosed, to confirm the Company's approach to collecting and disclosing data and information for these metrics, and to provide recommendations to management on the disclosure approach.

Methodology

The assurance process, which was conducted in August 2024, involved a desktop review of Swire Bulk's 2023 Sustainability Report and supporting statements/policies accessed through the report's website links, as well as data and information related to the Accounting and Activity Metric disclosures, for verification against related SASB requirements. Information was provided by, and discussions were held with, Swire Bulk's Sustainability team on behalf of representatives of the Company to confirm the data collection and disclosure approach and content related to these metrics. Based on this review process, observations were made that resulted in Swire Bulk making minor amendments to the SASB Index.

Findings and Recommendations

Based on data reviewed for the Accounting and Activity Metrics and additional information provided in the SASB Index, Swire Bulk's 2023 Sustainability Report includes accurate and robust information to support the Company's performance against the SASB Disclosure Topics, which align with Swire Bulk's material topics related to the environment, health and safety and ethical business conduct.

Swire Bulk continues to demonstrate its commitment to address material, global issues related to climate change, environmental health and biodiversity, as well as social equity and inclusivity, and to expand its ESG initiatives to not only meet evolving requirements but also the expectations of a responsible business. The Company's active engagement with global and industry initiatives for change and efforts to improve its performance against the SASB Disclosure Topics, is exemplary. Going forward, Swire Bulk is encouraged to continue evolving its disclosures in line with international standards and stakeholder expectations by preparing to meet the requirements of IFRS S1 and S2 and by explicitly considering both sustainability impact and financial materiality in its stakeholder engagement and materiality assessment processes. The Company is also encouraged to continue to enhance its approach to due diligence in the supply chain.



Anne Copeland
CEO & Sustainability Advisor, Copeland & Partners Ltd.
August 28th, 2024



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