

# **MODERN SLAVERY STATEMENT 2021**

ISSUED BY HUTCHISON PORTS EUROPE LIMITED AND ITS SUBSIDIARY  
COMPANIES

# INTRODUCTION

This statement is issued by Hutchison Ports Europe Limited and its subsidiary companies Hutchison Ports (UK) Limited, The Felixstowe Dock and Railway Company, Harwich International Port Limited, Maritime Transport Services Limited, Thamesport (London) Limited and Hutchison Logistics (UK) Limited (the “UK Group”), pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”).

Modern slavery is a term used to encapsulate both offences in the Act: slavery, servitude and forced or compulsory labour; and human trafficking. We are committed to preventing modern slavery and human trafficking in our corporate activities and our supply chains. We employ high ethical and professional standards and always seek to comply with all local laws and regulations applicable to our business. We expect the same high standards from those parties with whom we engage.

# GROUP STRUCTURE AND BUSINESS

Consisting of the Port of Felixstowe, Harwich International Port, London Thamesport and Hutchison Logistics, we are the UK Group of Hutchison Ports, the world's leading port network with over 30,000 employees which has operating ports and terminals in 26 countries. Our customers are principally shipping lines and we form part of the supply chain for many different goods entering the UK. We are committed to ensuring that our procurement of goods and services ensures our part of the supply chain is and remains fully compliant.

Our parent company is CK Hutchison Holdings Limited ("CKHH"), whose shares are listed on The Stock Exchange of Hong Kong. CKHH is a signatory to the UN Global Compact and its principles encompassing human rights, labour, environment and anti-corruption. As part of the CKHH group we seek to uphold these principles.

# SUPPLY CHAINS

Procurement is a centralised function across the UK Group and is delegated to a specialised Procurement Department. The procurement process is overseen by a Tender Committee, including Directors, executives and senior managers, with the Procurement Department ensuring that suppliers meet our required standards.

Procurement processes establishing these standards are reviewed annually. Our supply chains include suppliers of mechanical engineering equipment and providers of services including civil engineering, waste management, cleaning, catering, security and certain other subcontracted services.

# RISK ASSESSMENT

A large proportion of our suppliers are based in the UK and continental Europe and our own port operation businesses have fixed UK-based locations. Therefore, we do not consider that we operate in high-risk industries or territories, with reference to the Walk Free Global Slavery Index which identifies those most at risk. Notwithstanding this, we are vigilant to the risks and threats of modern slavery and human trafficking in all our business activities and relationships.

We are alert to potential problems that may arise where our suppliers may knowingly or unknowingly derive raw materials and labour from unethical sources or higher risk territories. We vet our suppliers to minimise such risk and reserve the right to suspend our business with them if we have concerns, to investigate and to terminate their contracts if necessary.

# DUE DILIGENCE

We determine our suppliers' obligations to publish their own Modern Slavery Statements. The suppliers with our highest spend levels are required, where applicable, to provide a Modern Slavery Statement each year. Other suppliers are asked to describe to us the practical measures they are taking to prevent modern slavery and human trafficking in their own business and supply chains. Each supplier is given a risk rating based on their geographical location. All high-risk suppliers must demonstrate what they are doing to mitigate risk through completing and returning our assessment of modern slavery and human trafficking survey.

We have standard contractual terms to ensure compliance with modern slavery requirements. These contractual terms follow-on from pre-qualification requirements establishing suppliers' good standing.

# DUE DILIGENCE (CONTINUED)

Ports are seen as vulnerable to human trafficking; however, all three of our UK ports are subject to strict security. There is a dedicated port police unit in operation at the Port of Felixstowe, and restricted access, surveillance and security in all of our ports. The UK Border Force operates at all three of our sites.

# POLICIES

Our Modern Slavery Policy is available on request or on our group websites and demonstrates our commitment to ensuring that neither modern slavery nor human trafficking occur in any part of our business or supply chains. Employees are actively encouraged to report any concerns they might have regarding modern slavery at the earliest opportunity, and are able to do so anonymously, via our specially designated Speak Up hotline.

The Modern Slavery Policy is complemented by other policies including Anti-Bribery and Corruption, Anti-Facilitation of Tax Evasion and Whistle-blowing. These policies are readily accessible to all employees via our intranet, and reviewed periodically. Policy updates are publicised internally, with staff receiving notification of substantial changes.



# TRAINING

We educate our employees to recognise the risk of modern slavery and human trafficking within our business and supply chains, and to report any breaches of our Modern Slavery Policy, which can be done in confidence.

Relevant staff are required to confirm their review of both the Modern Slavery and Whistle-blowing policies on commencement of their employment and regularly thereafter. As part of our periodic compliance training they are also expected to complete complementary mandatory online learning modules including: Anti-Bribery and Anti-Corruption; and Tax Evasion Awareness.

The aim is to mitigate the risk of modern slavery and associated illegal activities.

# KEY PERFORMANCE INDICATORS

We have developed the following Key Performance Indicators (KPIs) to help us to continually improve our efforts to combat modern slavery in our businesses and their supply chains:

- To ensure that 100% of our suppliers are assigned a risk rating depending on their geographical location.
- To ensure that 100% of our high-risk suppliers complete a self-assessment survey.
- To check that all of our top 20% of suppliers by value, where so required by the Act, produce an up-to-date Modern Slavery Statement.
- To ensure that 100% of procurement employees and other relevant staff undertake mandatory training in relation to modern slavery, which is repeated at least every two years.

We will assess our performance against these KPIs in future statements.

During the year no issues have been raised or supplier contracts terminated because of concerns around modern slavery. Our processes, which are now well embedded, will be reviewed with the aim of improving the breadth of coverage. At the end of the year we developed our KPIs against which to review performance and measure progress over time.

This statement is approved by the Board of Directors of each of Hutchison Ports Europe Limited, Hutchison Ports (UK) Limited, The Felixstowe Dock and Railway Company, Harwich International Port Limited, Maritime Transport Services Limited, Thamesport (London) Limited and Hutchison Logistics (UK) Limited and signed on its behalf by:



Clemence Cheng, Director

Date 25 April 2022