



# MODERN SLAVERY STATEMENT 2024

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 offences under 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 rigorously apply 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, operating ports and terminals in Asia, the Middle East, Africa, Europe, the Americas and Australasia. Our direct 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 Hong Kong Stock Exchange. CKHH is a signatory to the United Nations Global Compact with its principles encompassing human rights, labour, environment and anti-corruption. As part of the CKHH group we seek to fully support 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 managed via policy, process and oversight, including a Tender Committee, which includes Directors, executives and senior managers, with the Procurement Department ensuring that suppliers meet our required standards.

We have a Supplier Code of Conduct, setting out the standards we expect of our suppliers. This includes compliance with the law and sets our requirements in respect of labour and human rights, ethics, health and safety, and the environment. We expect our suppliers to comply with our Code if they have not adopted comparable standards of their own.

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

# POLICIES

Our Modern Slavery Policy, which is available on request or on our group websites, demonstrates our commitment to ensuring that neither modern slavery nor human trafficking occur in any part of our business or supply chains. A review of the policy was completed in March 2025 confirming the policy remained effective and no major changes were required. 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 designated Speak Up hotline. To date, no calls in respect of modern slavery have been received.

The Modern Slavery Policy is complemented by other policies including Anti-Bribery and Anti-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.

# 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 remain 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 check our suppliers' obligations to publish their own Modern Slavery Statements. Our suppliers with the highest spend levels that are required to produce a statement are asked to provide a copy 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 carry out an annual supplier survey, including specific modern slavery compliance questions, targeted at our principal suppliers to monitor continued compliance. An onsite audit process to check compliance for some of our largest suppliers has been introduced; as part of this process stated policies and processes are checked.

# DUE DILIGENCE (CONTINUED)

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.

Ports are seen as vulnerable to human trafficking; however, all of our UK ports are subject to strict security measures and procedures. 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 of our sites.

# TRAINING

The aim of staff training is to enhance awareness of the risk of modern slavery and associated illegal activities within the business and its supply chain.

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

As part of our periodic compliance training staff are required to complete complementary mandatory online learning modules including: Modern Slavery Awareness; Anti-Bribery and Anti-Corruption; Tax Evasion Awareness; and Introduction to Whistle-blowing. We also have an Employee Code of Conduct setting out expectations for standards of conduct for our staff.

# TRAINING (CONTINUED)

Relevant staff are also required to confirm their review of both the Modern Slavery and Whistle-blowing policies on commencement of their employment and regularly thereafter.

Breach of policies by staff may lead to disciplinary action that could ultimately result in termination of employment.

During the year employee communications included a refresher on modern slavery, highlighting the issue of modern slavery, what it might include, and sharing the modern slavery helpline number.

# 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 based on their geographical location (100% during 2024).
- To ensure that 100% of our high-risk suppliers complete a self-assessment survey (100% during 2024)(nine of 145 suppliers declared their supply chains included countries indicated by the Walk Free Global Index as high-risk, all nine completed the self-assessment survey. Of the nine high-risk suppliers two reported incidents, both of which related to recruitment practices, corrective actions (to update practices) had been recorded and applied by these suppliers in both cases).
- 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 (100% during 2024).
- 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 (100% during 2024).

During the year no issues of modern slavery relating to the UK Group have been raised and no supplier contracts have been terminated because of concerns around modern slavery. Our processes, which are now well embedded, are incrementally updated with the aim of improving the breadth of coverage.

It is intended that the 2025 Statement will acknowledge and reflect recent updated guidance on reporting.

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 23 June 2025