

Eaglestar Modern Slavery Policy

Purpose

As part of Eaglestar's Human Rights Commitment, this policy sets out Eaglestar's Policy on tackling modern slavery throughout our organization, especially supply chains and is consistent with MISC's disclosure obligations under the UK Modern Slavery Act 2015.

Scope

This policy applies to all jurisdictions in which Eaglestar operates and covers all individuals working onshore and offshore at all levels and grades on behalf of any company within Eaglestar in any capacity whatsoever, including without limitation, the senior management team, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as "Employees" throughout this policy).

Commitment

Eaglestar is committed to act ethically and with integrity in all our business dealings and relationships and in implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within Eaglestar's own business or in any of Eaglestar's supply chains.

Eaglestar is also committed in ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015. Eaglestar expects the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and Eaglestar expects that our suppliers will hold their own suppliers to the same high standards.

In compliance with Eaglestar's Human Rights Commitment, we seek to work with contractors who share our values of integrity, committed to fighting bribery and corruption and contribute to sustainable development. Eaglestar requires our contractors to respect internationally-recognised human rights, to comply with Eaglestar Code of Conduct and Business Ethics (CoBE) and all relevant legal requirements.

Review of procedures and training

Eaglestar will provide training to all Employees on modern slavery on a regular basis. The level of training an Employee receives will depend on the specific risks associated with their role.

Consequences of Non-compliance

Non-compliance with this Policy could have serious consequences for Eaglestar, including criminal penalties, loss of customers and reputational damage.

Any Employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct.

Eaglestar may terminate our relationship with other individuals and organisations working on Eaglestar's behalf if they breach this policy.

Eaglestar Modern Slavery Statement 2018/2019

Introduction

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 by Eaglestar Marine Holdings (L) Pte Ltd known as “Eaglestar”. It is intended to communicate the procedures and steps which MISC has taken relating to the management of the risk of modern slavery up to 24 May 2019.

About Eaglestar

Eaglestar provides a comprehensive range of integrated marine services. We operate and maintain a modern and diversified fleet of vessels, supported by a team of highly skilled, competent and dedicated professionals. Our Centre of Excellence leverages upon the combined resources and experience of more than 60 years in the shipping industry, enabling us to better serve key vessel segments in various markets.

As a multi-discipline shipmanagement arm, we are able to operate with more agility and scalability while exercising the wealth of technical and commercial expertise of our personnel both on shore and at sea. Safety is of utmost priority in our operations and the well-being of our seafarers. We strive to enable the delivery of reliable and efficient ship management services to our customers across the globe.

Eaglestar is jointly owned by MISC Berhad and AET.

Eaglestar Human Rights Commitment and Modern Slavery Policy

In August 2019, the Eaglestar Board has approved a ‘Human Rights Commitment’ where:

“Eaglestar is committed to respecting internationally recognized human rights in areas of its operations, complying with its Code of Business Ethics, and all relevant legal requirements.”

Eaglestar has also adopted a Modern Slavery Policy in conjunction with this statement, which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Eaglestar’s Values and Code of Business Ethics

Eaglestar is committed to acting with integrity in all its business dealings. The Eaglestar Group adheres to a Code of Business Conduct which outlines the standards and behaviours that the Eaglestar Group upholds and which emphasises due respect for human rights and compliance with applicable global laws and rules.

As a global corporation, Eaglestar respects the International Bill of Human Rights and supports the UN Universal Declaration of Human Rights as well as the principles concerning fundamental rights set out in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

Eaglestar also has a comprehensive whistleblowing policy in place and encourages all its workers, customers and business partners to report any concerns related to its direct activities or its supply chain. This includes any circumstances that give rise to an enhanced risk of slavery or human trafficking.

Human Rights Working Group (HR WG)

Eaglestar is part of MISC's established cross-functional Human Rights Working Group, which was formed to consider the way MISC implements its human rights commitments across the business and determine any adjustments or enhancement opportunities to improve our human rights performance.

The HR WG is to task, amongst others, to develop policies and procedures which included the adoption of a Modern Slavery Policy, to conduct risk assessments and due diligence and propose improvement actions to mitigate risks identified.

Due Diligence Process

As part of our initiative to identify and mitigate risk, the HR WG are to:

1. Conduct a Social Risk Assessment and Human Rights Due Diligence across the Eaglestar Group;
2. Determine steps taken and / or intended to be taken with regards to ensuring modern slavery and human trafficking is not taking place in MISC's business or supply chains; and
3. Ensure effective communication, awareness and training on Human Rights matters.

Supplier adherence to our values

In compliance with the Eaglestar Human Rights Commitment and the Modern Slavery Policy, we seek to work with contractors who share our values of integrity, committed to fighting bribery and corruption and contribute to sustainable development. Eaglestar also requires our contractors to respect internationally-recognised human rights, complying with Eaglestar Code of Conduct and Business Ethics (CoBE) and all relevant legal requirements. In November 2018, a session was given during a MISC GHSSE Contractors Engagement Forum to raise awareness on our requirement and expectation in complying with the CoBE. In accordance with our zero-tolerance approach to slavery, forced labour and human trafficking we will seek to ensure that all future agreements, which are used for the purchase and supply of goods and services, will allow us to terminate and cease dealing with any supplier in the event of any violations.

Awareness and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we are in the process of introducing training for all employees with enhanced training for relevant managers.

This statement has been approved by the Eaglestar's Board of Directors ("Board") and is signed on behalf of the Board by:



Capt Raja Sager
Managing Director / CEO

Date: 14 August 2019