

A.P. Møller - Mærsk A/S

Modern Slavery Statement 2022

A.P. Møller - Mærsk A/S

Modern Slavery Statement 2022

This statement is made in accordance with The Australian Commonwealth Modern Slavery Act 2018 as well as Section 54 of the UK Modern Slavery Act 2015 on behalf of the following entities reporting as part of A.P. Møller - Mærsk A/S (hereinafter referred to as Maersk or A.P. Møller - Maersk as the consolidated group of companies and A.P. Møller - Mærsk A/S as the parent company):

UK entities:

- Maersk Logistics and Services UK Limited
- Maersk Supply Service A/S
- Svitzer Marine Limited
- Maersk A/S
- Sealand Europe A/S
- Maersk Container Industry A/S
- Maersk Insurance A/S
- Maersk Oil Trading and Investments A/S

Australian entities:

- Maersk Logistics & Services Australia Pty Ltd (formerly known as Damco Australia Pty Ltd)
- Svitzer Australia Pty Ltd
- Svitzer Terminals Australia Pty Ltd
- Maersk A/S (Australia Branch)

The Statement provides an overview of Maersk's policies and due diligence processes relating to the risk of modern slavery* and should be regarded as complementary to the A.P. Møller - Maersk Sustainability Report 2022. A cross-functional working group representing A.P. Møller - Maersk and relevant companies owned or controlled by A.P. Møller - Maersk were actively engaged in developing the content of this Statement.

As of 1 September 2022, Maersk acquired LF Logistics and the company is being onboarded to Maersk policies and processes. LF Logistics was informed about modern slavery reporting requirements and will be included in our Modern Slavery Statement 2023, following the same principle as Maersk's financial statements regarding acquired (and divested) entities.

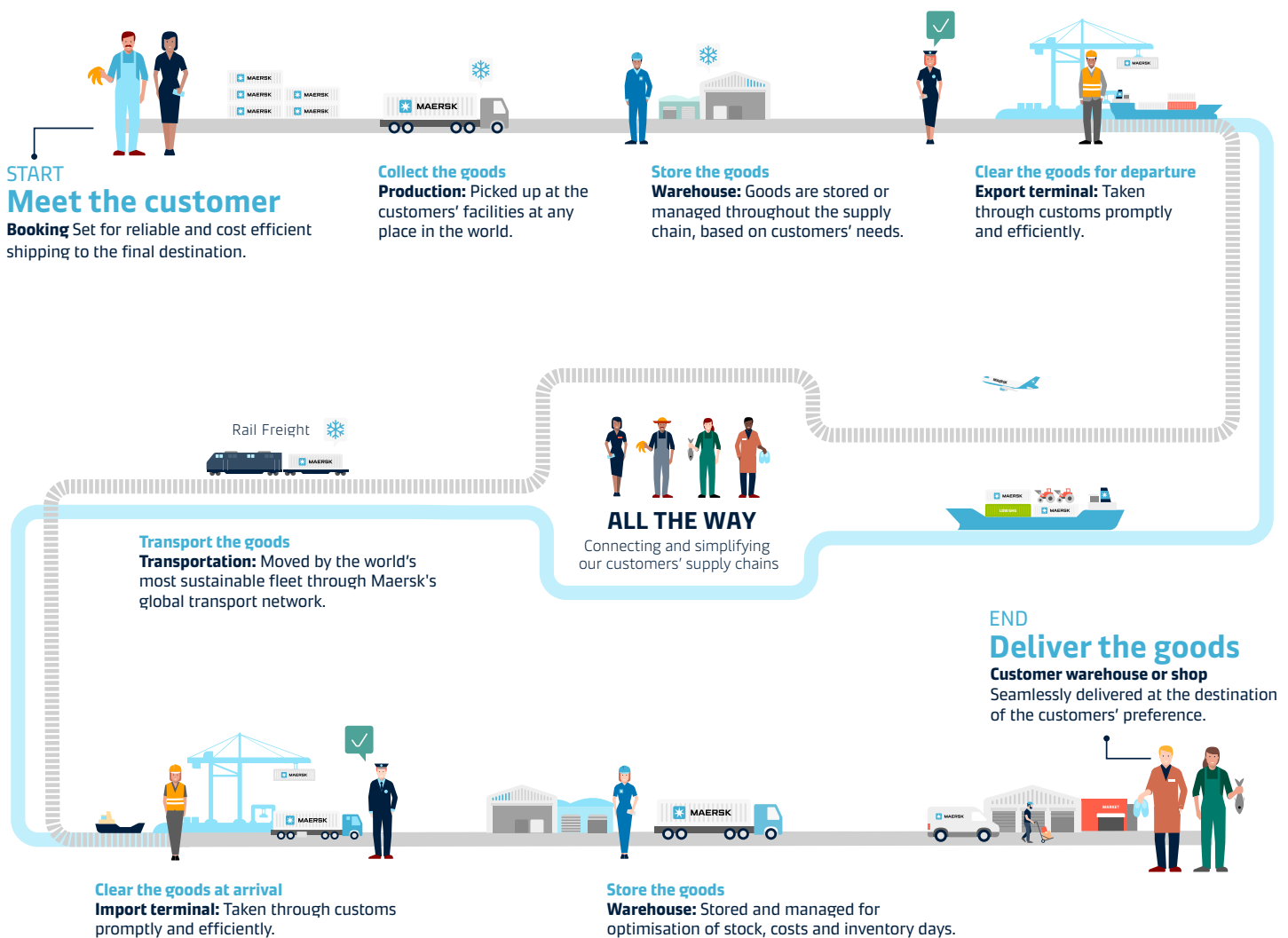
*Modern slavery refers to various forms of human rights violations which constitute criminal offences under multiple jurisdictions including the United Kingdom and Australia. Modern slavery is an umbrella term under the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) and encompasses slavery, servitude, the worst forms of child labour, forced or compulsory labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

Our Business

Our operations

Maersk is a global integrator of container logistics, aiming to connect and simplify our customers' supply chains and enable sustainable trade. We operate across more than 130 countries employing approximately 110,000 people. Maersk is headquartered in Copenhagen, Denmark, and is listed on the Copenhagen Stock Exchange.

Our operations are illustrated below:



Our value chain

Maersk is committed to respecting human rights, which includes ensuring our activities do not cause or contribute to the use of modern slavery and avoiding being directly linked to such harm. As we progress on our Global Integrator strategy, we are expanding the scope of our ambitions to ensure responsibility and sustainability in our supply chain. This is driven by a greater exposure to sustainability-related risks, opportunities, and responsibilities as we expand our landside activities.

As an integral part of our customers supply chains, we are also regularly engaging with our customers to support responsible business practices and help them deliver on their commitments to sustainability.

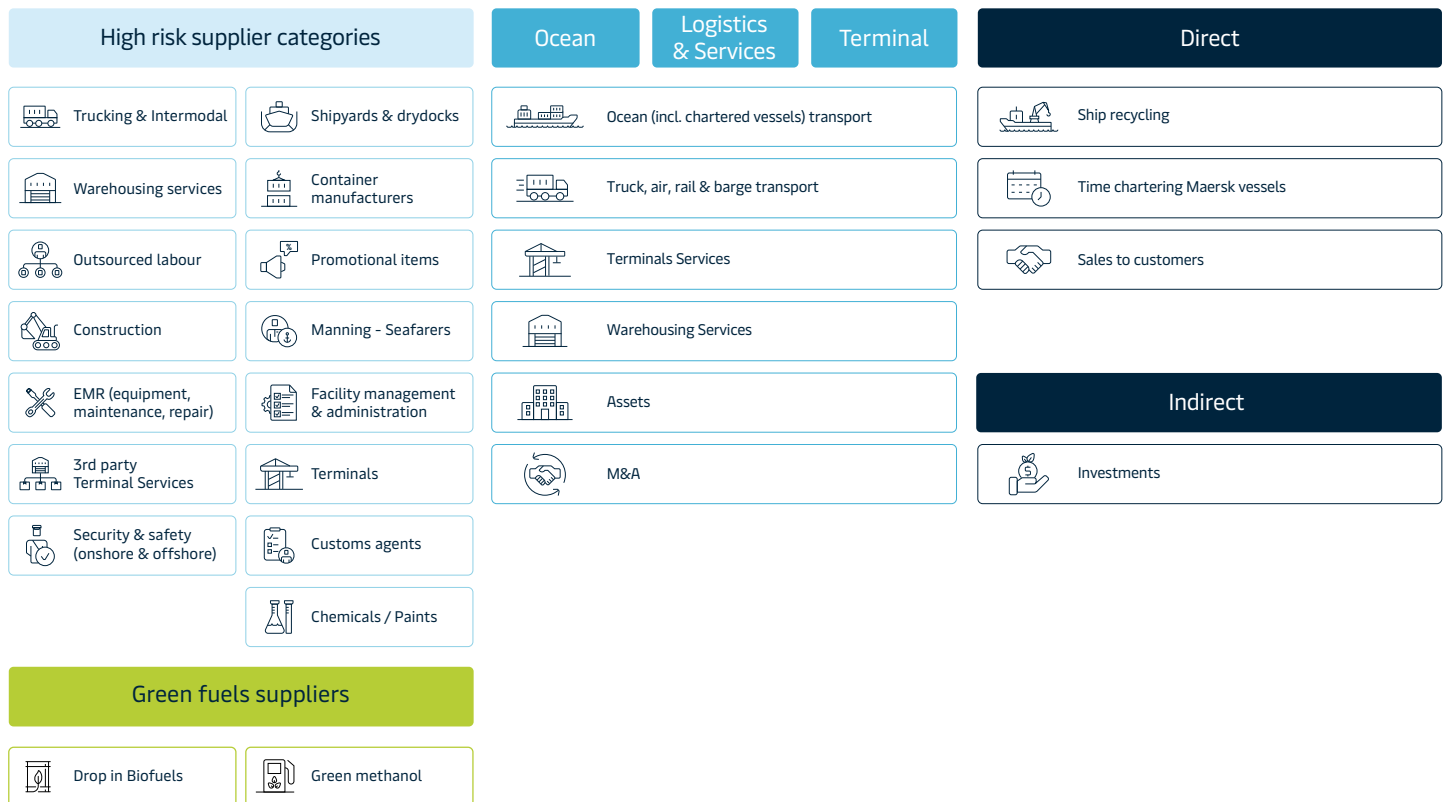
We rely on more than 60,000 suppliers including 5,300 high-risk suppliers in our global supply chains. Our high-risk suppliers are defined in 15 categories.

The main activities in our value chain are illustrated below:

Supply chain (Upstream)

Own operations

Downstream



Identifying modern slavery risks

In 2021, Maersk conducted a corporate-wide human rights assessment, together with external experts, with the purpose of mapping our most salient human rights impacts across the business and determining whether we have any gaps in our mitigating activities, in line with the UN Guiding Principles methodology. The assessment results showed that Maersk's salient human rights risks are: working conditions in the supply chain, health and safety in the supply chain, violence and harassment at work, access to remedy, plus an emerging risk on impacts of climate change and decarbonisation - including the importance of a just transition.

Modern slavery risks within our business

The human rights assessment showed that we have a very low risk of modern slavery in our own operations. On working conditions in general (wages, benefits, and hours) there is low risk

in our own operations, however, we can always strive to improve, for example, in limiting overtime hours and continuous focus on health and safety.

Modern slavery risks within our supply chain

The human rights assessment showed that modern slavery risks in the supply chain can be present. For example, the use of migrant workers and contracted labour, recruitment and use of manning agencies in logistics and services sector including warehousing and trucking, catering and facilities management

carries a higher risk. At Maersk, we identified 15 high-risk supplier categories (see value chain above). These high-risk supplier categories are prioritised for enhanced supplier due diligence, described further below.

Managing modern slavery risks

Human rights in Maersk

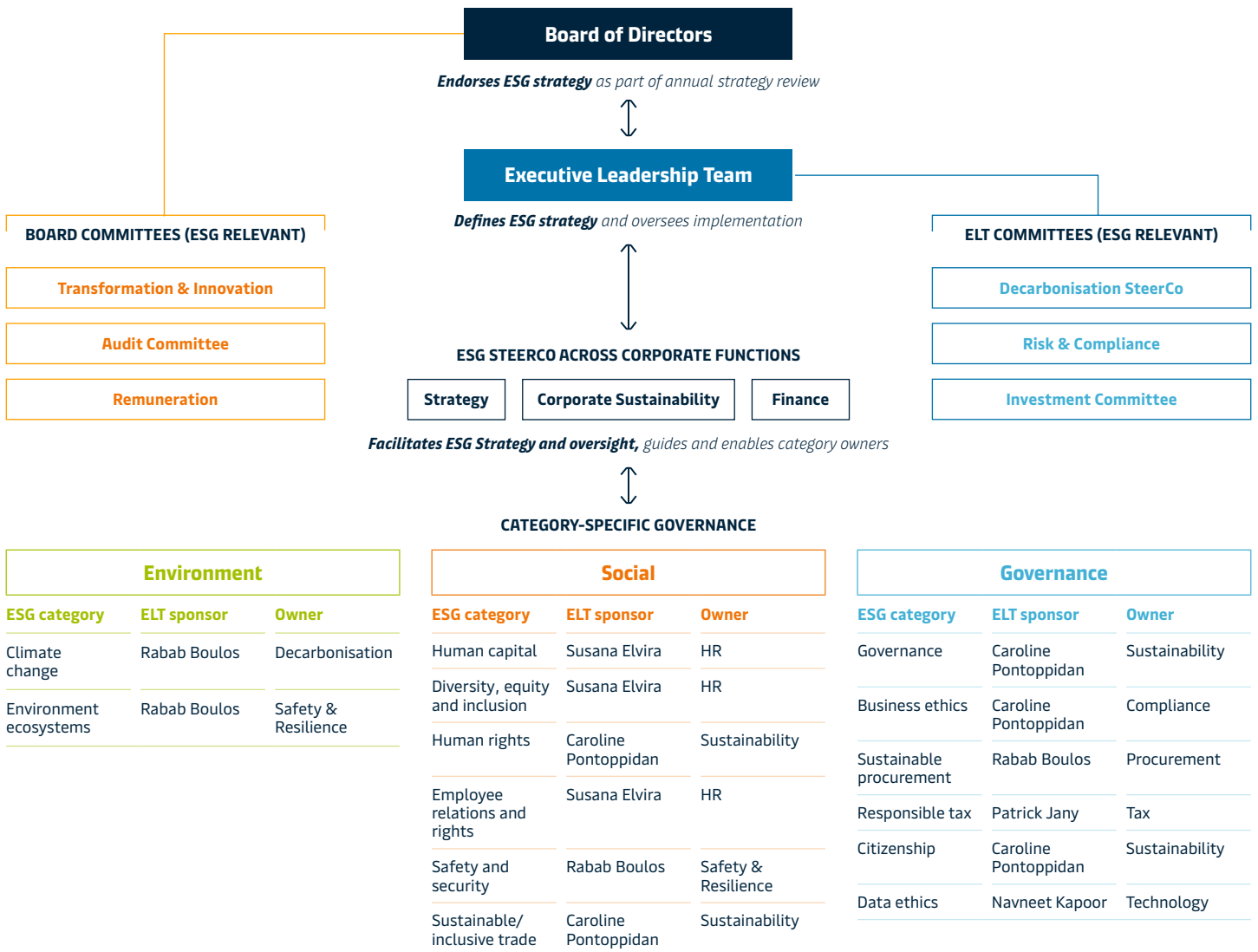
Maersk, and its subsidiaries, is committed to conducting business in a responsible and upright manner and to respect human rights across our activities, in line with the UN Guiding Principles. Our commitment to respect human rights is described further

in our [Human Rights Policy Statement](#). We have zero tolerance for forced or involuntary labour, human trafficking and other practices defined as 'modern slavery', which is outlined in the Maersk Code of Conduct and our Supplier Code of Conduct.

Governance

Building a strong human rights governance structure is a priority as we prepare for increased regulatory requirements. "Human rights" is one of the 14 categories in the Maersk ESG Strategy and is also embedded in several other ESG categories. Regular updates on human rights are provided to Maersk's Executive Leadership Team, as set out in our ESG Strategy governance framework.

As human rights is an overarching topic, responsibility for managing particular issues lies with the respective functions with support from specific governance forums. In 2022, we identified relevant internal governance forums and worked to strengthen the incorporation of human rights within their scope.



Policies

A.P. Moller - Maersk Code of Conduct

The Code of Conduct outlines our standards, based on international standards, and governs how employees within Maersk engage with customers, authorities, colleagues, suppliers, the community and other stakeholders. Our commitment to responsible business practices including fair employment practices and employee relations is a core component. Responsibility for implementing the Code of Conduct lies with the Executive Vice President and Chief Corporate Affairs Officer, reporting to the Executive Board. Governance of Maersk global policies (Commit Rules) is anchored in the Risk and Compliance Committee, where two members of the Executive Leadership Team meet quarterly.

Commit Rule on Global Employee Relations

The Commit Rule on Global Employee Relations details our standards and sets out responsibilities in relation to implementing our commitment to respect fundamental labour rights and provide decent working conditions for our employees. The Commit Rule explicitly forbids the use of forced or involuntary labour. The Commit Rule is implemented across Maersk. Responsibility for

monitoring the implementation of, and compliance with, the Commit Rule rests with the Maersk Global Employee Relations Council, reporting to the Executive Vice President and Chief People Officer.

Supplier Code of Conduct

The Maersk Supplier Code of Conduct describes expected business conduct by our suppliers, based on international standards. The Code is implemented through our global Sustainable Procurement programme (please see further below). The Code, supported by the Supplier Code of Conduct Guidelines, sets out expectations concerning responsible business behaviour in the areas of health and safety, equal opportunity rights, compensation and working hours, child labour and forced or involuntary labour, freedom of association, anti-corruption and environment. The leaders of our businesses and the Leadership team of Asset Strategy and Strategic Partnership (which includes our procurement function) are responsible for implementing the Sustainable Procurement Programme, reporting to our Executive Board.

Due diligence

Maersk is committed to respecting human rights in line with the UN Guiding Principles. We take a risk-based approach to our human rights due diligence activities and continuously strengthen key processes that enable us to identify and act upon actual and potential human rights risks in our operations and through our business partnerships.

We assess compliance with the Supplier Code of Conduct with suppliers in high-risk categories by conducting due diligence activities such as audits, self-assessments, and documentation reviews. In the past years we increased the number of onsite audits for logistics and service-suppliers, primarily related to third party workers in terminals and warehouses. Additionally, we conduct periodic reviews and follow-up audits. Our suppliers are also required to address any gaps against our Supplier Code of Conduct through a time-bound improvement plan in consultation with Maersk. Our audit and assessment activities in 2022 are detailed further below.

To ensure that Maersk is able to meet supplier due diligence requirements and effectively contribute to business accountability, Sustainable Procurement is working to embed ESG into our end-to-end procurement process. In 2022, we improved visibility into high-risk supplier ESG compliance by monitoring progress at the procurement category and regional level for supplier code of conduct acceptance, ESG assessments conducted and closing improvement plans.

Technology is also helping us to enhance due diligence, increasing reach and transparency and supporting higher assurance on supplier data reporting through a single source of supplier ESG information. The roll-out of a supplier ESG risk assessment tool was initiated in 2022. A supplier ESG data management module will be rolled out in 2023, enabling us to progressively implement a single overview for supplier ESG data.

Continued focus on third-party labour

We continue to work on ensuring that people working on our premises and performing tasks for us, but not hired by us directly, are offered working conditions that meet the standards in our Supplier Code of Conduct. Since 2019, we have focused specifically on working conditions for third party workers in trucking, warehousing and terminals as part of our sustainable procurement efforts. We have established a pre-qualifying self-assessment, and since 2021 applied an audit process for

the trucking category in five locations, involving a collaboration between members of Maersk's local health, safety, security and environment teams and local procurement teams. In 2022, we developed specific Global Standards on Third-Party Labour to offer clear guidance on core labour standards and manage our expectations on suppliers of Third-Party Labour. We will begin rolling out the Maersk Global Standards on Third-Party Labour in 2023, starting with selected locations in APM Terminals.

Training

All employees must complete annual training in our Code of Conduct. In 2022, the completion rate was 83%, which is on track to meet our target of having 100% completion rate by 2023. In 2022, we also restarted in-person Code of Conduct training for high-risk locations and functions for the first time after the pandemic.

To support the implementation of our Supplier Code of Conduct, we also train our employees working with procurement activities via an online course on our sustainable procurement process and requirements. In 2022, 80% of the employees in scope completed the training.

Collaboration and stakeholder engagement

We partner with customers, suppliers and other networks to promote responsible business practices and increase leverage for change where possible. Stakeholder engagement informs our understanding of material issues and underpins the development of solutions and initiatives in our roadmap to deliver on ESG commitments and KPIs. On human rights issues, ongoing engagement with civil society and rightsholders is important for informing our approach, and we engage with rightsholders and their representatives including unions and local communities. Furthermore, Maersk works with its customers to support responsible business practices across all relevant sustainability areas. This includes sharing best practices, cross-industry

collaborations as well as insights and advisory support on material issues. Across the ESG agenda, we are actively engaged in cross-industry partnerships and coalitions to set standards, develop solutions and drive common agendas.

In 2022 we continued our participation in the Responsible Trucking initiative run by CSR Europe. The first phase of this project was completed and guidelines on sustainable procurement practices in this category were published. Our participation in this initiative allowed us to gain information about social risks in landside transportation such as safety and working conditions.

Maersk Whistleblower System and Ombuds function

We take seriously any allegations that human rights are not respected in our operations or via our business relationships. Allegations can be reported by any person within or outside Maersk through our whistleblower system, available worldwide in more than 75 languages. It enables people to report concerns safely on all human rights issues, including human trafficking and forced or involuntary labour, child labour, and actions harming persons, their livelihood or properties, related to our operations, suppliers, contractors, third-party agents, and other business partners with a direct link to Maersk.

In 2021, Maersk introduced the internal Ombuds function as a neutral, independent, informal and 100% confidential function that will listen to and assist those employees who do not feel comfortable reporting concerns to human resources departments, line managers or posting to the whistleblower system, in resolving conflicts or concerns. It offers a voluntary and safe place for employees to seek guidance, voice concerns and discuss options for any work - related matter.

Assessing our effectiveness

We continually assess the risks that our business causes, contributes, or is directly linked to adverse human rights impacts, in line with the UN Guiding Principles, and monitor the effectiveness of the processes and procedures to address these risks. One way that we measure the effectiveness of our policies and

procedures in relation to the supply chain is to conduct audits and assessments, and related to that, follow up with improvement plans. For 2022 our supplier audit and assessment activities are detailed below.

2022 performance towards our strategic targets on Sustainable Procurement

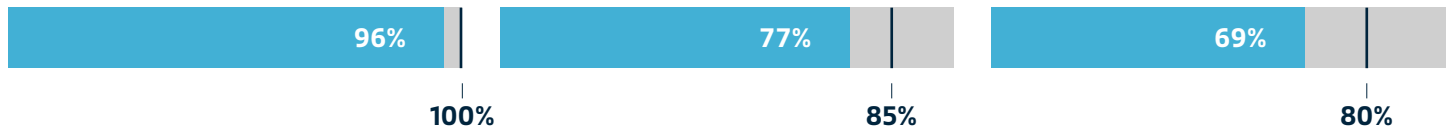
■ Achieved in 2022

■ 2024 target

100% of suppliers (in scope) committed to the Suppliers Code of Conduct by 2024

>85% of strategic suppliers undergoing ESG assessment by 2024

>80% of high-risk category suppliers with Improvement Plan successfully closed by 2024*



*Our 15 high-risk categories are: Trucking and Intermodal, warehousing services, facility management, outsourced labour, terminals, shipbuilding yards and drydocks, security offshore, promotional items, customs agents, security onshore, construction, chemicals and paints, equipment, maintenance and repair, container manufacturers and manning (seafarers).

Focusing on our own company, one way we are measuring the effectiveness of our processes is via our biennial labour rights assessment. Every 2-3 years Maersk sends out an internal questionnaire to the business to gauge how effective the Commit Rule on Global Employee Relations is implemented, covering both our own employees and contracted staff. In 2021 we have conducted an assessment which showed that our labour rights issues are mainly related to working hours, discrimination,

and compensation. We are addressing the challenges by direct engagement with local management, with training and tools for managers, strengthened workplace harassment incident processes, and with mechanisms such as the Maersk Whistleblower system and Ombuds function. In 2023 we will continue our efforts to strengthen the labour rights due diligence process to gather actionable insights that will help address these issues in our business.

Looking ahead

We are committed to respecting human rights, which includes ensuring our activities do not cause or contribute to the use of modern slavery and human trafficking and avoiding being directly linked to such harm. We will continue to improve and increase transparency on our progress, mitigating risks through our policies, procedures and engagement with stakeholders. Maersk acknowledges that this work is an evolving process, and we will track progress via our ESG Strategy, reported mainly through our website and annual sustainability report. Looking ahead, we are planning to:

- Scale up supplier engagement
- Further develop and strengthen our human rights due diligence
- Implement procurement ESG platform
- Integrate ESG into procurement training
- Continue strengthening our compliance programme by focusing on rolling out our Code of Conduct training to all targeted employees and digitalising our compliance reporting and internal compliance controls.

More information can be read in our [Sustainability Report 2022](#).

This statement was approved by the executive management of A.P. Møller - Mærsk A/S, signed:

DocuSigned by:

Caroline Pontoppidan

0F508189CCB5457...

Caroline Pontoppidan

Executive Vice President and Chief Corporate Affairs Officer, A.P. Møller - Mærsk A/S

DocuSigned by:

Patrick Jany

0D1D2A33629E43C...

Patrick Jany

Executive Board Member and Chief Financial Officer, A.P. Møller - Mærsk A/S

