

**USERNAME**

swirespo

1. Company particulars and overall approach**1.1 - PRIMARY COMPANY NAME**

Swire Pacific Offshore Operations Pte Ltd

1.2 - ALTERNATIVE COMPANY NAMES

Swire Pacific Offshore (SPO)

1.3 - HEAD OFFICE LOCATION

Singapore

1.4 - WEBSITE

<https://www.swire.com.sg>

1.5 - COMPANY LOGO

- [srti_0008_swire.jpg](#)

1.6 - NUMBER OF SHIPS OPERATED

75

1.6.1 - NUMBER OF SHIPS OWNED

74

1.6.3 - NUMBER OF SHIPS CHARTERED

1

1.7 - SHIP TYPES COVERED, PLEASE SELECT ALL THAT APPLY:

- OSVs

1.8 - PLEASE PROVIDE A BRIEF INTRODUCTION TO YOUR COMPANY

Headquartered in Singapore, with regional controlling offices in Brazil, Australia, Cameroon and the United Arab Emirates, and agent offices in various localities, SPO is well poised to operate vessels in every major oil exploration region outside of North America. Expansion in capabilities to other complementary services like seismic survey, emergency response to oil spillage, salvage and deepwater recovery operations enables SPO to become a one-stop solution to meet clients' diverse needs.

1.9 - WHAT IS YOUR OVERALL APPROACH / POSITIONING ON SHIP RECYCLING?

The Swire Pacific Offshore group of companies has a Policy that all ships at the end of their economic lives will be recycled in a sustainable, safe, responsible and environmentally sound manner.

2. Ship recycling policy and standards**2.1 - DOES THE COMPANY HAVE A WRITTEN POLICY ON SHIP RECYCLING FOR ITS OWNED VESSELS?**

Yes

2.1.1 - IS IT PUBLICLY AVAILABLE?

No

2.1.3 - SINCE WHEN HAS THIS POLICY BEEN APPLIED?

2012

2.2 - DOES THE COMPANY KEEP RECORDS OF SHIPS WHICH HAVE BEEN SENT FOR RECYCLING?

Yes

2.3 - WHAT INTERNATIONAL CONVENTIONS AND PRINCIPLES DOES THE POLICY ADHERE TO?

- EU Ship Recycling Regulation (2013)
- Hong Kong International Convention for the safe and environmentally sound recycling of ships (2009)

2.4 - DOES THE EU SHIP RECYCLING REGULATION APPLY TO THE COMPANY'S OWNED SHIPS?

Yes

2.4.1 - HOW MANY SHIPS DOES THE REGULATION APPLY TO?

<25%

2.5 - WHICH TOPICS DOES THE POLICY ADDRESS?

- Environment
- Health and safety
- Labour and human rights
- Anti-corruption
- Sub-contractors
- Downstream facilities for managing waste and hazardous materials

2.6 - DOES THE POLICY CONTAIN RESTRICTIONS BASED ON GEOGRAPHY AND/OR RECYCLING METHODS?

No

2.7 - DOES THE COMPANY HAVE A WRITTEN POLICY FOR SELECTING A YARD OR BUYER FOR RECYCLING?

Yes

2.7.1 - PLEASE PROVIDE FURTHER DETAILS INCLUDING A URL IF THE POLICY IS PUBLIC

If SPO is seeking to recycle a ship it will only tender to (or via Cash buyers warranting to use) Ship Recycling Facilities ("SRF") that are currently (and expected to be for the duration of the dismantling) fully certified by a reputable, independent, competent third party as having valid and verified accreditation against the Hong Kong International Convention ("HKC") for the Safe and Environmentally Sound Recycling of Ships (whether or not yet formally adopted), and additionally if it is an EU Flagged ship, or departing on final voyage from an EU port, the SRF must by EU law be on "the white list" under the EU Ship Recycling Regulations ("SSR") 1257/2013; The reputable, independent, competent third parties referred to in (2) above include (only) the following class societies: ClassNK, LR and DNV. This list will be reviewed periodically by SPO's recycling representative ("RecRep"), generally the GM - Sustainable Development ("GM - SD").

2.8 - DOES THE COMPANY MAKE SHIP RECYCLING PART OF THE COMPANY'S SUSTAINABILITY GOALS?

Yes

2.9 - DOES THE COMPANY INCLUDE SHIP RECYCLING INFORMATION IN ITS SUSTAINABILITY REPORTING?

Yes

2.10 - DOES THE COMPANY HAVE A SHIP RECYCLING STANDARD* (OR SIMILARLY NAMED) IN FORCE?

Yes

2.10.1 - FROM WHEN HAS THIS BEEN IN FORCE?

2012

3. Policy for selling owned vessels for further trading

3.1 - DOES THE COMPANY HAVE A POLICY TO PROMOTE RESPONSIBLE RECYCLING OF OWNED VESSELS SOLD FOR FURTHER TRADING?

Yes

3.1.1 - PLEASE PROVIDE FURTHER DETAILS

When a ship is offered for sale at the end of its economic life to SPO: a. If the residual value is greater than 40% above the highest current scrap value then there need be no additional contractual provisions concerning sustainable recycling of the ship; b. If the residual value is between 25% and 40% above the highest current scrap value then there shall be included in the sale contract a contractual provision that the buyer must warrant to trade the ship for the subsequent 2 calendar years or, if the absence of this, to sustainably recycle the ship according to the SPO Sustainable Recycling Policy (and by extension, this SOP); c. In all other cases (viz. the residual value is below 25% above the highest current scrap value) then there shall be included in the sale contract a contractual provision that the buyer must warrant the ship will be sustainably recycled according to the SPO Sustainable Recycling Policy (and by extension, this SOP).

3.2 - DOES THE COMPANY IMPOSE LEGALLY BINDING COVENANTS OR OFFER COMMERCIAL INCENTIVES TO THE BUYER TO ENCOURAGE RESPONSIBLE SHIP RECYCLING?

Yes

3.2.1 - PLEASE PROVIDE FURTHER DETAILS

As per previous answer and then as required within the Agreed Bill of Sale

3.3 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS CHARTERED FOR 5 YEARS AND OVER, RELEASED FOR REDEPLOYMENT OR RECYCLING?

Never

3.4 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS CHARTERED FOR 2 YEARS AND OVER RELEASED FOR REDEPLOYMENT OR RECYCLING?

Never

3.5 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS OWNED THROUGH JVS?

Always

3.5.1 - PLEASE PROVIDE FURTHER DETAILS

We have always maintained management control of vessels owned through j/vs. Should the vessel reach the end of its economic life, its management would be determined by SPO in accordance with the above.

4. Ship recycling contract

4.1 - DOES THE COMPANY FOLLOW A STANDARD CONTRACT FOR THE SALE OF VESSELS FOR GREEN RECYCLING (E.G. RECYCLECON FROM BIMCO)?

Never

4.2 - DOES THE CONTRACT INCLUDE AN EXPLICIT REQUIREMENT TO RECYCLE THE VESSEL AT A SPECIFIC SHIP RECYCLING FACILITY?

Always

4.2.1 - PLEASE PROVIDE FURTHER DETAILS

Our own in house Sale contract has included this requirement in the very rare (3 in 45 years) occurrences when an owned vessel has reached the end of its economic life and been sent for sustainable recycling. We envisage that in the future we would deliver the vessel to the recycling facility specified in the contract, as we are doing in our sister company.

4.3 - DOES THE COMPANY REQUIRE ACCESS TO THE SHIP RECYCLING FACILITY DURING THE RECYCLING PROCESS FOR ANY OF THE FOLLOWING? PLEASE SELECT ANY/ALL THAT MAY APPLY

- Monitoring
- Stop-work
- Performance follow-up

4.4 - DOES THE CONTRACT REQUIRE COMPLIANCE WITH THE COMPANY'S WRITTEN POLICY ON SHIP RECYCLING?

Yes

4.5 - WHAT PROTECTION IS IN PLACE FOR THE SELLER TO ENSURE THAT MILESTONES CAN BE SET, THAT ACCESS TO THE SHIP AND MONITORING CAN BE MAINTAINED THROUGHOUT THE SHIP RECYCLING PROCESS?

The award of the sale for recycling of a SPO vessel at the end of its economic life to a cash buyer and/or the SRF itself directly shall include as a minimum, but not limited to, the following clauses: a. SPO will provide, at its sole cost and responsibility, both an HKC Compliance Monitoring Team ("CMT") consisting of personnel such as at Master level, 2/E level and Bosun level, together with an auditor from a reputable, independent, competent third party, to work with the SRF management to close the gaps between the Ship Recycling Management Plan of the SRF ("SRFP") and reality, and establish best SRF practice building on, and exceeding where feasible, the HKC; b. The CMT and 3rd Party Auditor will be employed by SPO HOF through contracts with relevant 3rd parties. These personnel will act as Technical Advisers to the SRF Management, and will expressly have no authority to instruct any SRF personnel to start, continue, or stop any work practices, except as explicitly provided below; c. It will be agreed between the SRF and SPO that all the personnel of SPO, including the CMT, RecRep and contracted auditor, will have the authority and responsibility to order all work to be stopped immediately on the recycling operation should they become aware of any work practices or omissions that have the potential to cause imminent or immediate harm to a) the health and safety of the workers, b) the environment. The stop work order will remain in place until the cause has been identified and remedied or rectified to the satisfaction of SPO; d. It will be agreed between the SRF and SPO that all the personnel of SPO, including the RecRep, CMT and any contracted auditor, will have the authority and responsibility to request a meeting with the SRF Management should they become aware of any work practices or omissions that, whilst they may not have the potential to cause immediate harm to people of the environment, but they are in contravention to the Ship Recycling Plan for the specific vessel in question ("SSRP") or SRFP or the HKC. The meeting with management will occur as soon as possible and recommend systems, procedures and/or practices such as will remedy or rectify the compliance shortfall to the satisfaction of SPO; e. The SRF (and CMT) will provide a weekly sustainable recycling progress report to the GM - SD, from the time of beaching to the time of obtaining a Certificate of Completion of Recycling from the appropriate regulatory body; This report will be submitted by e-mail prior to opening business Singapore each week and will include as a minimum i. Executive Summary; ii. Man-hours worked and full HS&E statistics (FAT, PTB, PPD, LTI (and LTIFR), RWC, MTC, FAC (and TRCFR), AD, NMR, RTA, Environmental Spills, Compliance notices and any fines or penalties issued); iii. Stop work orders - reason and time to rectify; iv. Training undertaken, for whom, by whom and against which standard; v. Work permits issued (e.g. Hot work, enclosed space, work at height or over water); vi. Dismantling progress made over previous week - text and photographs describing key activities, measured against SRP, and a forecast ETC; vii. Details of internal and external audits of both SRF equipment, and processes measured against the requirements of the HKC; viii. Details of all recycled products and Hazardous Material disposed of, and to which certified, competent facility, over the preceding period; ix. Suggestions for improvement. f. Both the SPO RecRep and the contracted reputable, independent, competent third party auditor will visit the SRF during the dismantling, both announced and unannounced. The frequency will be as agreed between SPO GM SD and the 3rd Party Auditor, but is likely to be around monthly. The Audit During Recycling ("ADR") will be undertaken on site involving the SPO GM SD, 3rd Party Auditor, CMT and SRF Senior Management. Each ADR will be shared with the CMT and SRF to enable them to build capacity and competence further; g. The SRF will provide a full certified copy of the local regulatory Recycling Completion Report when this is obtained; h. A Post Completion closeout Audit Review ("PCAR") will be undertaken on site involving the SPO GM - SD, 3rd Party Auditor and SRF Senior Management. The final PCAR will be shared with the SRF to enable them to build capacity and competence further;

5. Inventory of Hazardous Materials (IHM) and Ship Recycling Documentation

5.1 - DOES THE COMPANY HAVE A SHIP RECYCLING PLAN FOR EACH VESSEL?

Yes

5.2 - DOES THE COMPANY PROVIDE THE BUYER OR SHIP RECYCLER WITH A CLASS APPROVED IHM, AT THE TIME OF FINALISING THE SHIP RECYCLING CONTRACT?

Always

5.3 - DOES THE COMPANY PROVIDE ALL RELEVANT SHIP CERTIFICATES, PLANS, PROCEDURES AND DOCUMENTS, TO ENABLE THE YARDS TO FOLLOW APPLICABLE SHIP RECYCLING GUIDELINES (AND THE RELEVANT STANDARDS FROM QUESTION 2.2. THAT THE COMPANY IS ALIGNED TO)?

Always

5.4 - DOES THE COMPANY HAVE SPECIFIC REQUIREMENTS FOR HANDLING HAZARDOUS MATERIALS AS LISTED IN THE STOCKHOLM CONVENTION?

No

6. Implementation of the ship recycling policy and standard

6.1 - DOES THE COMPANY REQUIRE THE SHIP RECYCLING FACILITY TO HAVE A HONG KONG CONVENTION STATEMENT OF COMPLIANCE ISSUED BY A CLASSIFICATION SOCIETY?

Always

6.1.1 - PLEASE PROVIDE FURTHER DETAILS

2 If SPO is seeking to recycle a ship it will only tender to (or via Cash buyers warranting to use) Ship Recycling Facilities ("SRF") that are currently (and expected to be for the duration of the dismantling) fully certified by a reputable, independent, competent third party as having valid and verified accreditation against the Hong Kong International Convention ("HKC") for the Safe and Environmentally Sound Recycling of Ships (whether or not yet formally adopted), and additionally if it is an EU Flagged ship, or departing on final voyage from an EU port, the SRF must by EU law be on "the white list" under the EU Ship Recycling Regulations ("SSR") 1257/2013; 3 The reputable, independent, competent third parties referred to in (2) above include (only) the following class societies: ClassNK, LR and DNV. This list will be reviewed periodically by SPO's recycling representative ("RecRep"), generally the GM - Sustainable Development ("GM - SD")

6.2 - DOES THE COMPANY CARRY OUT ADDITIONAL AUDITS TO VERIFY COMPLIANCE PRIOR TO RECYCLING?

Always

6.2.1 - PLEASE PROVIDE FURTHER DETAILS

4 SPO's RecRep will undertake an on-site audit against the Sustainable Shipping Initiative Responsible Ship Recycling Standard ("SSI RSRS") [see L4 document SSI RSRS] of any/all successfully tendering SRF, accompanied by a reputable, independent, competent third party, and this must have minimal NCRs on completion, as a subject to final confirmation of award of the sale for recycling; 5 The award of the sale for recycling of a SPO vessel at the end of its economic life to a cash buyer and/or the SRF itself directly shall include as a minimum, but not limited to, the following clauses: a. SPO will provide, at its sole cost and responsibility, both an HKC Compliance Monitoring Team ("CMT") consisting of personnel such as at Master level, 2/E level and Bosun level, together with an auditor from a reputable, independent, competent third party, to work with the SRF management to close the gaps between the Ship Recycling Management Plan of the SRF ("SRFP") and reality, and establish best SRF practice building on, and exceeding where feasible, the HKC; b. The CMT and 3rd Party Auditor will be employed by SPO HOF through contracts with relevant 3rd parties. These personnel will act as Technical Advisers to the SRF Management, and will expressly have no authority to instruct any SRF personnel to start, continue, or stop any work practices, except as explicitly provided below; c. It will be agreed between the SRF and SPO that all the personnel of SPO, including the CMT, RecRep and contracted auditor, will have the authority and responsibility to order all work to be stopped immediately on the recycling operation should they become aware of any work practices or omissions that have the potential to cause imminent or immediate harm to a) the health and safety of the workers, b) the environment. The stop work order will remain in place until the cause has been identified and remedied or rectified to the satisfaction of SPO; d. It will be agreed between the SRF and SPO that all the personnel of SPO, including the RecRep, CMT and any contracted auditor, will have the authority and responsibility to request a meeting with the SRF Management should they become aware of any work practices or omissions that, whilst they may not have the potential to cause immediate harm to people of the environment, but they are in contravention to the Ship Recycling Plan for the specific vessel in question ("SSRP") or SRFP or the HKC. The meeting with management will occur as soon as possible and recommend systems, procedures and/or practices such as will remedy or rectify the compliance shortfall to the satisfaction of SPO; e. The SRF (and CMT) will provide a weekly sustainable recycling progress report to the GM - SD, from the time of beaching to the time of obtaining a Certificate of Completion of Recycling from the appropriate regulatory body; This report will be submitted by e-mail prior to opening business Singapore each week and will include as a minimum i. Executive Summary; ii. Man-hours worked and full HS&E

statistics (FAT, PTD, PPD, LTI (and LTIFR), RWC, MTC, FAC (and TRCFR), AD, NMR, RTA, Environmental Spills, Compliance notices and any fines or penalties issued); iii. Stop work orders – reason and time to rectify; iv. Training undertaken, for whom, by whom and against which standard; v. Work permits issued (e.g. Hot work, enclosed space, work at height or over water); vi. Dismantling progress made over previous week – text and photographs describing key activities, measured against SRP, and a forecast ETC; vii. Details of internal and external audits of both SRF equipment, and processes measured against the requirements of the HKC; viii. Details of all recycled products and Hazardous Material disposed of, and to which certified, competent facility, over the preceding period; ix. Suggestions for improvement. f. Both the SPO RecRep and the contracted reputable, independent, competent third party auditor will visit the SRF during the dismantling, both announced and unannounced. The frequency will be as agreed between SPO GM SD and the 3rd Party Auditor, but is likely to be around monthly. The Audit During Recycling (“ADR”) will be undertaken on site involving the SPO GM SD, 3rd Party Auditor, CMT and SRF Senior Management. Each ADR will be shared with the CMT and SRF to enable them to build capacity and competence further;

6.3 - DOES THE COMPANY MONITOR YARD COMPLIANCE DURING THE RECYCLING PROCESS?

Always

6.3.1 - PLEASE DESCRIBE HOW THE MONITORING TAKES PLACE (PLEASE SELECT ANY/ALL THAT MAY APPLY). THROUGH:

- Spot checks
- Ongoing supervision
- Company representative on-site

6.3.2 - PLEASE DESCRIBE WHAT TOPICS THE MONITORING ADDRESSES (PLEASE SELECT ANY/ALL THAT MAY APPLY)

- Environment
- Health and Safety
- Labour and Human Rights

6.4 - DOES THE COMPANY HAVE THE CONTRACTUAL RIGHT TO STOP WORK AT THE FACILITY, IN CASE OF UNSAFE OPERATIONS OR OTHER NON-COMPLIANCES?

Always

6.5 - DOES THE COMPANY REQUIRE FACILITIES TO PROVIDE A PROCESS WHEREBY YARD WORKERS CAN VOICE AND RESOLVE CONCERNS AND GRIEVANCES REGARDING ALL WORKPLACE ISSUES WITHOUT FEAR OF RETRIBUTION?

Always

6.5.1 - PLEASE PROVIDE FURTHER DETAILS

N/A

6.6 - DOES THE COMPANY REQUIRE FACILITIES TO ENABLE YARD WORKERS TO ASSOCIATE AND BARGAIN COLLECTIVELY?

Never

7. Other comments

7.1 - PLEASE USE THIS AREA TO PROVIDE FURTHER INFORMATION ON THE COMPANY'S APPROACH TO SHIP RECYCLING IF NOT ALREADY COVERED

SPO has a policy requirement to recycle its ships at the end of their economic life, and this is done in accordance with our Sustainable Ship Recycling Standard Operating Procedure contained in our Corporate Governance Manual - much of which is cut and pasted above. The only reason this is not public at present (in reference to an early question above) is due to the corporate web site being redesigned. The full SOP is certainly viewable in our CGM on request.