



## Fred. Olsen Cruise Lines

Fred. Olsen House, White House Road, Ipswich, IP1 5LL  
Tel: 01473 292 200 Reservations: 01473 742 424

# Modern Slavery and Human Trafficking

The Company takes its stance on Modern Slavery and Human Trafficking very seriously and has taken the following measures to ensure it treats employees fairly.

### **Forced or involuntary labour**

Employees shall not be subject to any form of forced labour. All work must be voluntary and Employees shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

### **Recruitment fees**

Employees shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

### **Document retention**

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (eg: passports) is strictly prohibited. The retention of personal documents shall not be used as a means to bind Employees to employment or to restrict their freedom of movement.

### **Contracts of employment**

Written contracts of employment shall be provided to migrant Employees in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. Migrant Employees shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

### **Deposits**

Migrant Employees shall not be required to lodge deposits or security payments at any time.

### **Humane Treatment**

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all Employees, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of Employees; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour. The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited.

### **Equality**

All Employees, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant Employees shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant Employees (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.



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### **Wages and benefits**

All Employees shall be paid at least the minimum wage required by applicable laws, and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to Employees, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of Employees. Clear and transparent information shall be provided to Employees about hours worked, rates of pay, and the calculation of legal deductions. All Employees must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep Employees tied to the employer or to their jobs. Employees shall not be forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

### **Working hours**

Employees shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

### **Freedom of movement and personal freedom**

Employees' freedom of movement shall not be unreasonably restricted. Employees shall not be physically confined to the workplace or related premises, such as employer- or recruiter operated residences; nor shall any other coercive means be used to restrict Employees' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

### **Grievance procedure**

Any migrant worker, acting individually or with other Employees, can submit a grievance using the Company's established Grievance Procedure without suffering any prejudice or retaliation of any kind.

### **Private employment agencies and labour recruiters**

Companies should hire migrant Employees directly whenever possible. When the subcontracting of recruitment and hiring is necessary, companies shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places Employees at risk of forced labour or trafficking for labour exploitation

### **Staff Training**

Since the publication of the previous statement a Training Programme on Modern Slavery and Human Trafficking has been designed and delivered staff with line management and contract negotiation responsibilities via presentations in Senior Management Meetings and e-learning. This has applied to both Ship and Shore based staff. Over the next year we will further embed this by ensuring relevant job profiles have been updated to include responsibilities in relation to Modern Slavery and Human Trafficking.

### **Board Approval**

This Policy Statement has been approved by the Board of Fred. Olsen Cruise Lines Ltd who will review it annually.

Signed:

Mike Rodwell – Managing Director  
9 May 2019