



Fred. Olsen Cruise Lines

Fred. Olsen House, White House Road, Ipswich, IP1 5LL

Tel: 01473 292 200 Reservations: 01473 742 424

MODERN DAY SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2020

Fred. Olsen Cruise Lines Ltd (“FOCL”), being the primary trading entity within the First Olsen (Holdings) Limited group (“FOHL”), is committed to ensuring that business is conducted in a professional and ethical manner that respects and adheres to the human rights of all employees. This extends to all companies within the FOHL group and affiliated parties included in the supply chain. All suppliers to FOHL are expected to uphold these same standards and values and to have policies in place that demonstrate their commitment to conduct business in a responsible and ethical manner.

The Modern Slavery Act 2015 came into effect in March 2015 and is the first of its kind in Europe. The legislation enhances the support and protection for victims of human trafficking and enslavement. FOCL is wholly supportive of the Act and has the following statements to make regarding our stance:

- FOCL will not tolerate the use of forced or child labour in any of its operations.
- FOCL will not tolerate the physical punishment, abuse or involuntary servitude of any worker.
- Our attitude to modern slavery and human trafficking is zero tolerance and we expect all those in our supply chain to comply with our values.
- If a supplier is found to be demonstrating unacceptable practices they will be investigated and provided with guidance regarding immediate required improvements.
- If no improvement is implemented or they indicate an unwillingness to cease unacceptable practices they will be reported to the appropriate authorities and trading with this supplier would cease.

This statement is pursuant to Section 54(1) of the Modern Slavery Act 2015 and forms our slavery and human trafficking statement for the financial year ended 31 December 2020.

Organisational structure and supply chain

FOCL operates cruise vessels undertaking international itineraries throughout the year. In normal trading conditions, turnover is in excess of £200m and the company employs c150 employees at its Head Office in Suffolk and c1,700 crew members of varying nationalities on board the vessels.

All purchasing and contract negotiation is undertaken via the Head Office function, utilising suppliers for goods predominantly from the UK and the EU, and suppliers for port and destination services all around the world.

Our suppliers are selected carefully, and time is invested in building good working relationships to ensure there is a common understanding of ethical business practices by all parties. Due diligence checks are conducted on all new suppliers to ensure financial stability, and operational audits are carried out on suppliers providing services to ensure suitable procedures and policies are adhered to.



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Policies to combat Trafficking and Slavery

We are committed to providing applicable staff with a salary equivalent to, or higher than, the minimum wage required by applicable laws, along with offering the required statutory leave entitlement. Clear and transparent information shall be provided to employees about hours worked, rates of pay, and the calculation of legal deductions.

Employees will not be forced to work in excess of the number of hours permitted in national law, and any overtime shall be voluntary unless part of a legally recognised collective bargaining agreement.

Employees have the freedom to terminate their employment at any time without penalty, given reasonable notice.

Written contracts of employment are provided to all employees, in clear language, and no fees for recruitment are passed on to employees. Employment manuals and associated policies including, but not limited to, employee conduct, employment benefits, grievance procedures, and misconduct are freely available to all employees.

A whistle-blowing policy is in place, both shoreside and on board the vessels, which encourages the reporting of suspected or actual malpractice or illegal acts. A "Designated Person Ashore" is contactable at all times by vessel crew in order to make reports of any conduct which contravenes group policies, alongside reporting to the shoreside HR Director.

FOCL will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

Due diligence

The prevention, detection and reporting of modern slavery in any part of FOCL's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the group or under the group's control. All employees are required to avoid any activity that might lead to a breach of this policy.

FOCL aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. FOCL is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The group's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Policies and systems are in place across our business to identify inappropriate employment practices, assess potential risk areas, mitigate risks, and investigate reports made. Due diligence checks are carried out on new suppliers and/ or at contract renewals; open and honest relationships are built with our suppliers and our expectations of their business ethics are made clear.



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Measuring effectiveness

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they are found to have been involved in modern slavery.

External financial and operational audits are carried out annually to ensure compliance with policies and documented procedures. No issues in relation to modern slavery and human trafficking have been identified during the year.

Training

To ensure appropriate understanding of the risks of modern slavery and human trafficking, online training is provided to those staff and crew whose roles may be impacted. All UK based staff are required to complete this training every year as a refresher.

Where appropriate, the Modern Slavery Act has been referenced in policies and procedures which are communicated with staff and crew via a central policies database.

Board Approval

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

Peter Deer
Managing Director

Dated: 30 April 2021