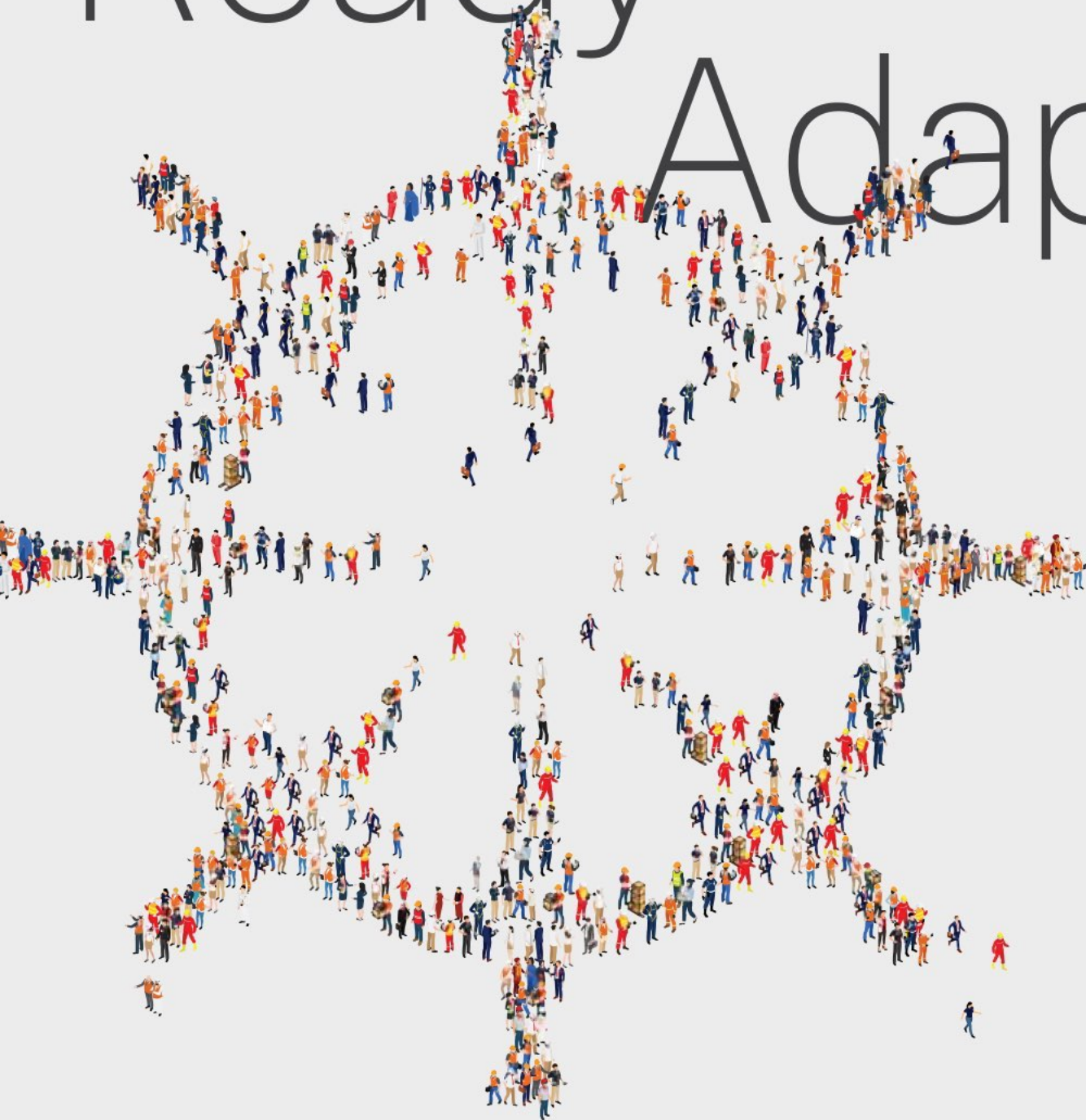




SAMUDERA SHIPPING

Ready to Adapt



2019 Annual Report

Samudera Shipping Line Ltd

Sustainability Report

Message From The Chairman

Dear Stakeholders,

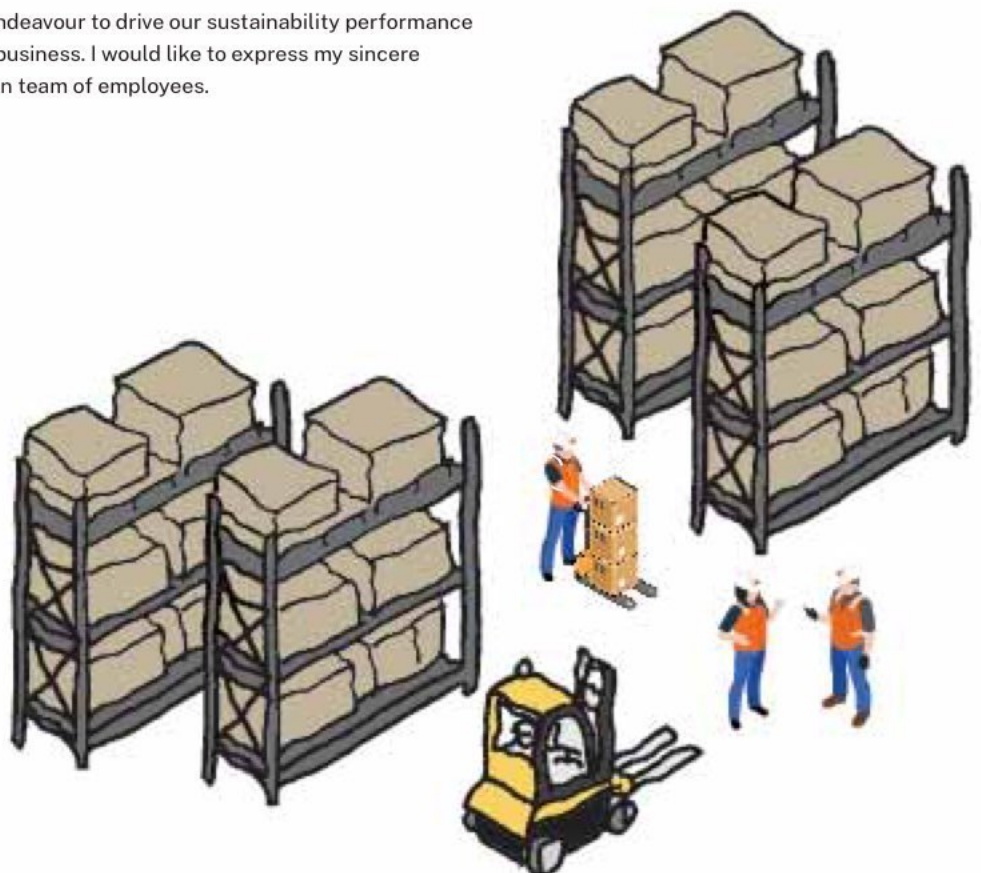
On behalf of the Board, I am pleased to present the third Sustainability Report of Samudera Shipping Line Ltd ("Samudera"). This Sustainability Report demonstrates Samudera's continued drive to align environmental, social and governance (ESG) considerations within our operations, steering our sustainability performance and helping build a future-ready maritime Singapore. The report is aligned with SGX-ST Listing Rules Practice Note 7.6: "Sustainability Reporting Guide" and is prepared in accordance with Global Reporting Initiative (GRI) Standards.

The Board views sustainability as a foundation for our core values of "Integrity and Professionalism". Our material ESG factors of economic performance, environmental responsibility, workforce management and corporate governance remain unchanged in 2019. These material ESG factors focus our sustainability objectives and steer our sustainability endeavours. The Board oversees the management of these material ESG factors, provides oversight and counsel on the direction, and approves the disclosure of sustainability performance and targets in this report. The Board is supported by senior management in developing policies and overseeing the Group's sustainability practices.

Looking to 2020 and beyond, we shall endeavour to drive our sustainability performance to support the continued growth of our business. I would like to express my sincere appreciation to our committed and driven team of employees.

Masli Mulia

Executive Chairman



Who We Are

Samudera Shipping Line Ltd and its subsidiaries (“Group”) focus on three main business segments in the shipping industry, namely, Container Shipping, Bulk and Tanker, as well as Logistics and Others.

1. Container Shipping

Samudera offers reliable feeder services between the central “hub” port in Singapore and smaller size “spoke” ports in the region. The Group connects ports across a wide geographical range, spanning from Southeast Asia, the Indian Subcontinent, the Far East and the Middle East.



2. Bulk and Tanker

Samudera's fleet of bulk carriers and tankers are chartered out for the transportation of dry or liquid cargo.

3. Logistics and Others

Samudera provides agency services, forwarding, warehousing as well as general logistics services.

Samudera is listed on the Mainboard of Singapore Exchange Securities Trading Limited. For more corporate information, kindly refer to the relevant sections within this Annual Report.



Sustainability Report

About This Report

This Sustainability Report covers Samudera's sustainability practices and performance from 1 January to 31 December 2019 ("FY2019"). The report aligns with the requirements of SGX-ST Listing Rules Practice Note 7.6: "Sustainability Reporting Guide". The report is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. The GRI Standards form one of the most widely used and trusted sustainability reporting frameworks globally, and as such have been selected for use in this report. Please refer to page 48-50 for the GRI Content Index. No external assurance has been sought for this report.

We welcome your feedback to help us improve our sustainability practices and reporting. Please forward your feedback or enquiries to sustainability@samudera.id or (65) 6430 1687.

Reporting Scope

The ESG policies, practices and performance disclosed in the Sustainability Report¹ relate to the listed entity, Samudera Shipping Line Ltd and its six container vessels, as well as two of Samudera's key subsidiaries in Singapore². Foremost Maritime Pte Ltd ("Foremost") principally engages in the transportation of dry-bulk commodities, while SILkargo Logistics (Singapore) Pte Ltd ("SILkargo") specialises in logistics and forwarding business. Samudera consistently practises the same high level of business ethics across all its operations. We will continue to review our reporting scope in consideration of encompassing other subsidiaries and geographic areas in future reports.

Sustainability at Samudera



In driving and overseeing sustainability practices, The Board is supported by senior management within the Group. To this effect, Samudera has established a Sustainable Steering Committee (SSC) tasked with evaluating performance and setting sustainability direction for the company and reviewing processes and procedures. The SSC is chaired by Samudera's CEO.

At an operational level, Samudera has appointed a dedicated Sustainability Officer, working directly with our operations team and reporting directly to the SSC.

A Sustainability Working Committee (SWC) has also been established, composed of representatives from our Operation, Finance, Human Resources, and Information Technology divisions, as well as our Risk Officer and Sustainability Officer. In addition, a representative from our subsidiary, SILkargo, also sits on this committee.

Please refer to our Corporate Governance Report 2019 for full details.

Materiality Review

Samudera reviewed our material ESG factors in 2019. We continue to focus on these factors for our sustainability endeavours and sustainability reporting. Our material ESG factors are mapped into four broad sustainability aspects as shown in the table below.

Sustainability Aspect	Material ESG Factor
Economic Performance	1. Generating economic value
Environmental	2. Strengthening environment
Workforce Management	3. Providing safe working conditions
	4. Investing in employee development
Corporate Governance	5. Maintaining a strong compliance record

¹ Except the "Generating economic value" section, which covers Samudera Shipping Line Ltd and all its subsidiaries, following the same scope as the "Financial Statement" section in this Annual Report.

² Foremost has divested all vessels held under this entity in September 2019. Where applicable, Foremost data has been included in this report for the period January-August 2019.

Contributing to the Sustainable Development Goals

The United Nations Sustainable Development Goals (“SDGs” or “Global Goals”) are a universal set of ambitious goals to end poverty, protect the planet, and ensure prosperity for all through balancing the economic, social and environmental dimensions of sustainable development.

These 17 Global Goals provide an opportunity for businesses to make focused contributions to the international 2030 Agenda for Sustainable Development. We recognise that we can align our sustainability endeavours to these Global Goals, and in doing so, support Singapore’s efforts in implementing and achieving the SDGs globally.

This year we take our first steps in aligning with the SDGs by mapping our material sustainability topics against the Goals and identifying where we can make the most significant contributions. We will continue to define and develop our prioritised Goals and will seek to identify the most appropriate targets and business indicators to track our progress going forward.

Building a Future-ready Maritime Singapore

The Maritime and Port Authority of Singapore (“MPA”) have in place a future-ready framework with the aim to develop and promote Singapore as a premier global hub port and an international maritime centre, and to advance and safeguard Singapore’s strategic maritime interests. As part of this framework, MPA have highlighted a number of initiatives as key to attaining these goals. Samudera’s sustainability endeavours are contributing to the following areas:

- ‘Augment Singapore’s leading position as global bunkering hub through sustainable shipping efforts’. Refer to page 39 for further details on Samudera’s sustainability endeavours and the influence on our value chain.
- ‘Strengthen maritime safety and emergency preparedness’. Refer to page 43 for further details on how Samudera provides safe conditions, and page 46 detailing our strong compliance record.
- ‘Develop capabilities in early detection and response to cyber security threat’. Refer to page 47 for highlights on Samudera’s IT data protection approach.
- ‘Develop a multi-skilled workforce with global mindset’. Refer to page 45 for further details on how we invest in our employees.

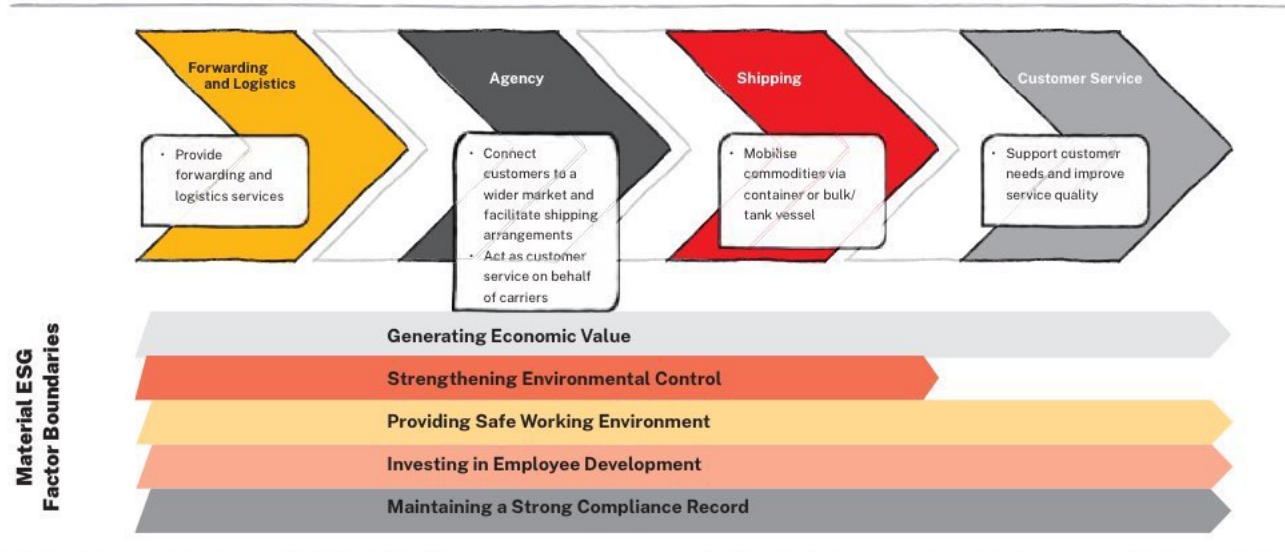
Sustainability Across Our Value Chain

Samudera’s value chain extends across multiple markets and industries through our global shipping network. We proactively engage a mix of stakeholders to help inform, focus, and unite our sustainability endeavours across the Group. Our engagement reaches out to our suppliers, employees, customers and port authorities, at each stage of our activities. The diagram below shows the boundaries of each of our material factors in our value chain.



Sustainability Report

Our Value Chain



Stakeholder engagement is important to create a collaborative experience. Through such engagement, we can seek to understand the factors important to our stakeholders and shape the approach to our material sustainability issues. This allows us to be responsive, and ensures we continue to focus our sustainability efforts on that which is most material to our business activities. At the same time, we aim to cultivate a stronger sense of ownership regarding sustainability through continued communication, earning continued support from our stakeholders.

The following table identifies our key stakeholders and shows how they are engaged during the year.

Key Stakeholders	Key Topics of Concern	Engagement Methods	Frequency of Engagement
Investors and shareholders	<ul style="list-style-type: none"> • Business operations and performance • Business strategy and outlook 	<ul style="list-style-type: none"> • Release of financial results and other relevant disclosures through SGXNet and Samudera's website • Annual General Meeting • Meeting with investors and stock analysts 	<ul style="list-style-type: none"> • Throughout the year • Once a year • Throughout the year
Employees	<ul style="list-style-type: none"> • Benefits and compensation • Workplace safety and well-being • Career development and progression • Employee-management relationship 	<ul style="list-style-type: none"> • Management meeting • Social and team building activities • Safety training • In-house and external trainings • Performance feedback and review • Intranet portal • Employee volunteering opportunities 	<ul style="list-style-type: none"> • Throughout the year • Throughout the year • Throughout the year • Throughout the year • Once a year • Throughout the year • At least once a year
Port authorities	<ul style="list-style-type: none"> • Compliance with laws and regulations 	<ul style="list-style-type: none"> • Compliance surveillance and monitoring 	<ul style="list-style-type: none"> • Throughout the year
Customers	<ul style="list-style-type: none"> • Reliability and quality of services • Environmental and social impacts of services 	<ul style="list-style-type: none"> • Feedback via website & email • Customer meetings 	<ul style="list-style-type: none"> • Throughout the year • Throughout the year
Business partners	<ul style="list-style-type: none"> • Safety and environmental practices • Transparent cooperation with integrity • Mutual growth 	<ul style="list-style-type: none"> • Business partners meetings 	<ul style="list-style-type: none"> • Throughout the year
Local community	<ul style="list-style-type: none"> • Environmental impacts • Social contributions 	<ul style="list-style-type: none"> • CSR activities • Facilitation of trade and business through shipping services 	<ul style="list-style-type: none"> • Throughout the year • Throughout the year

Generating Economic Value

Performance Indicator	Performance in 2019	Target for 2020
Revenue	USD373.8 million	Continue to leverage on our extensive network and high-level of professionalism to provide the key connections for the region and beyond

Since its incorporation in 1993, Samudera has established itself as a reliable and trustworthy regional leader in the shipping industry. Positioned as a well-established regional container shipping service provider, Samudera provides end-to-end solution to the transportation of cargos.

Our agile and responsive decision making, together with our high service quality and strong network are points of pride for the Group and distinction for our customers. These qualities enable us to pursue new opportunities for growth, as well as providing the foundation for long-term financial resilience. In 2019, we have successfully started new businesses including transportation of ISO tank and warehousing business. We are still aiming to expand our non-shipping business, specifically logistics business as we see potential for revenue diversification. Further, we believe this business would complement and even create synergies with our core business.

We positioned ourselves to remain nimble during this challenging business environment. Although such situation has impacted our performance, we continue to strengthen our current operations as well as our presence within the region. Our revenue has decreased from USD422.3 million in 2018 to USD373.8 million in 2019. We have recorded a net profit of

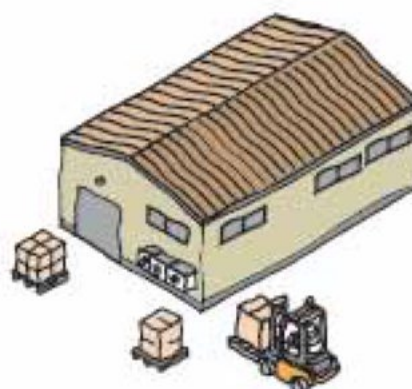
USD4.2 million. Details of the financial performance in 2019 can be found in the Financial Statement section of this Annual Report.

Beyond its direct economic contribution to employees and shareholders, Samudera facilitates trade and creates business opportunities for the broader community. We will continue to leverage on our extensive network and high-level of professionalism to provide the key connections for the region and beyond in the years ahead.

Strengthening Environmental Controls

Performance Indicator	Performance in 2019	Target for 2020
Compliance with applicable regulations regarding oil spillage	100% 2019 Target achieved	Maintain 100% vessel-compliance rate for oil spill regulations
Number of significant ³ oil spill incidents	0 2019 Target achieved	Maintain zero significant oil spill incidents.
Compliance with IMO 2020	Not applicable in 2019	100% vessel-compliance rate for IMO 2020 regulations

³ 'Significant' being a spill that requires a clean-up response and causes for fine/ non-monetary sanction with value above S\$100,000



Sustainability Report

Samudera transports various chemical, oils and industrial compounds as part of our operations. We acknowledge the potential risks of environmental pollution if these compounds are accidentally spilled into the surrounding environment. Such loss of containment would also lead to a breach of regulation and significant fines, as well as the loss of our good reputation.

Committed to protecting the natural environment, we strive to strengthen our environmental controls to minimise our pollution risks. For this purpose, our ship manager has established an Environmental Management System (EMS) certified in compliance with ISO14001:2015. The EMS guides our ship manager and crew to monitor, evaluate and take corrective actions related to environmental issues. Based on a sound understanding of our operations and the environmental concerns within the maritime industry, the EMS establishes a comprehensive set of Standard Operating Procedures (SOPs) as part of our Shipboard Procedure Manual (SPM). For example, our Marine Pollution Prevention Procedures within SPM covers a range of topics related to pollution control, including:

- ballast water management
- prevention of pollution by oil
- control of pollution by noxious liquid in bulk
- control of pollution by harmful substances carried in packaged form
- prevention of pollution by sewage and garbage
- prevention of air pollution and noise from ship
- prevention of pollution by anti-fouling paint

We also ensure all our vessels maintain up-to-date environmental certifications. These include the International Oil Pollution Prevention (IOPP) Certificate, the International Air Pollution Prevention (IAPP) Certificate, the International Sewage Pollution Prevention (ISPP) Certificate, and the Ballast Water Management Certificate (BWMC).

Oil spills, in particular, can have severe environmental and public health consequences. We place particular emphasis on effectively managing both the risk and the result of an oil spill. We focus on hiring competent crew members and provide them with the necessary training and equipment to efficiently prevent and manage a spill incident. In addition to the procedure mentioned above, we also have in place a specialised policy document 'Bunker and Oil Transfer Procedures' to establish the SOPs on the loading, discharge and internal transfer of oils, such as cargo oil, bunker fuel oil and lubricating oil. A qualified Chief Engineer supervises all procedures related to oil transfer and provide the necessary guidance to ensure SOPs are strictly adhered to. Our equipment is also inspected and maintained regularly to reduce risk of spills due to machine malfunction, with any defect reported immediately to ensure prompt rectification.

Furthermore, we extend our commitment to prevent oil spills to our value chain. We have in place a stringent screening process to select responsible bunker suppliers. This process involves a matrix approach to assess bunker supplier criteria, such as supplier qualification, quality of supply and MPA ranking, amongst others. We also extended incident management training to all partners across our owned and chartered vessels.

Contingency plans have been established to deal with emergency situations which may result in oil spills, such as collisions, grounding and machine failures. Every vessel is equipped with the necessary pollution prevention procedures to contain damage to a minimum. Frequent oil spill drills are undertaken by our crew to ensure they stay prepared with up-to-date methods and skills for potential emergencies.



All our vessels are covered under the Civil Liability Convention (CLC) Bunker Certificate, which provides us with the financial insurance to cover the liability of any potential pollution damage.

We are pleased to announce that in 2019 we have achieved our target for the year of zero incidents involving significant oil spills and that we maintained a 100% vessel-compliance rate for oil spill regulations.

In the coming year, we aim to maintain our oil spill zero incident record, as well as our 100% vessel-compliance rate for oil spill regulations.

2019 Highlight: Preparing for IMO 2020

The International Maritime Organisation (IMO) has ruled that from 1 January 2020, shipping emissions of sulphur in international waters will be reduced by setting a fuel sulphur content limit of 0.50% mass by mass. The industry will need to meet this regulation through the adoption of low-sulphur fuels or by engineering solutions (e.g. scrubbers) to reduce sulphur emissions.

We view IMO 2020 seriously and will ensure all vessels comply strictly with this new regulation. All our vessels will be compliant by 1 January 2020, and we will report on our compliance going forward.

Low Sulphur Fuel Oil (LSFO) Usage

This year, we have applied a schedule to prepare our vessels for IMO 2020 through the use of LSFO. This involves cleaning the fuel tanks, pipes, and machineries prior to the switch to LSFO to avoid operational issues with potential sludge or sediment build up linked to the new fuel blend.

We will also apply regular fuel analysis checking across our fleet in order to make sure the sulphur content is in compliance with the IMO regulation.

SOx Scrubbers

We have not retrofitted scrubbers to our existing vessels as it is not efficient in terms of return on investment. However, we have installed scrubbers for our two units of new build container ship under LTTC which plan to be delivered in the second half of year 2020.

Providing Safe Working Conditions

Performance Indicator	Performance in 2019	Target for 2020
Number of significant* incidents involving dangerous goods	0	Zero significant workplace accidents, including incidents involving dangerous goods
Workplace fatalities	0	
Workplace injuries	1	

*Significant incidents refer to accidents which resulted in personal injury

Being in the shipping industry means some of our employees are in roles that are subject to certain occupational health and safety (OHS) risks. We aim to address and mitigate these risks as a responsible employer and are committed to providing a safe and healthy environment for our people.

The company continuously identifies potential safety hazards and implements precautions to eliminate or reduce those risks. To formalise our management approach, we have set up an OHS management framework which takes reference from the Ministry of Manpower's Workplace Safety and Health (WSH) Act in Singapore. We also implement a Group HSE Policy and have in place a number of SOPs as part of our SPM, including Safety on Board, Safe Navigation All the Time, and Safe Handling Cargo, amongst others.

OHS training is provided on a regular basis for all relevant employees. Operational personnel are also trained to conduct risk assessment to identify workplace hazards and implement risk control measures. Annual reviews are also conducted on ship management as part of our OHS monitoring to assess compliance with the Group's safety policies and procedures. Any findings will be followed up thoroughly to ensure the necessary corrective actions are put in place.

The handling of dangerous good is a particular focus of our OHS management as the consequences of mishandling can be severe and pose a threat to both worker's safety and the surrounding environment. Incidents involving the mishandling of dangerous goods can also result in legislative fines or sanctions, bringing financial and reputational loss.



Sustainability Report

We have established SOPs to achieve the safe stowage of dangerous goods. The potential dangers are properly signposted and corresponding emergency plans are formulated and communicated. We have also set up a flowchart to guide our employee through decision makings with regard to dangerous goods, in compliance with relevant laws and regulations. We also have in place a safety checklist to require Material Safety Data Sheets⁴ (MSDS) to be submitted prior to approval of loading cargo on board.

We strive to continuously enhance our management for dangerous goods. We update our prohibited cargo list periodically according to our Protection & Indemnity Club coverage and relevant authority regulations as part of our on-going efforts to prevent incidents involving dangerous goods. Since 2017, we have also been developing a computerised software programme to improve the control system for dangerous goods and avoid the risk of human error. This system allows better planning and monitoring of dangerous good stowage on board. The system will be implemented in the first quarter 2020.

There were no significant incidents or near misses involving dangerous goods handling resulting in personal injury in 2019. However, one incident was recorded where a worker⁵ sustained an injury, giving us an injury rate for the year of 1.6 injuries per million man hours worked. This incident was related to the individual suffering from heart disease. As our general practice, medical check-ups will always be conducted on crew before boarding a vessel.

In 2020, we continue to target zero significant workplace accidents, including incidents involving dangerous goods.

⁴ A MSDS is a document that contains information on the potential hazards (health, fire, reactivity and environmental) of the chemical product and how to work safely with the chemical product.

⁵ Workers are not employees but whose work and/or workplace is controlled by Samudera

2019 Case Study: Learning from a Near-Miss

During the year, a near-miss incident was recorded when one of our vessels berthed in Thailand.

A crew member on the vessel was nearly hit while standing on the cross deck by a falling bridge fitting used for securing the container boxes. He saw a stevedore was throwing the bridge fitting from the 2nd tier of the containers.

The crew member was wearing the correct personal protective equipment (PPE), but recognised that the bridge fitting could still have caused a serious injury had it hit him. The crew member immediately alerted the stevedore of its actions and informed the port safety officer and foreman on duty of the incident.

To prevent similar incidents in the future, all crew were briefed clearly about preventive actions before going on deck to perform any tasks when the vessel is berthed at port. One such action is to conduct a lashing/unlashing briefing for the stevedores together with the crew before cargo operations.

Beyond workplace safety, Samudera is also committed to promoting employee health and wellbeing. We also ensure our ship managers and crew follow procedures that have been established. For instance, in 2019 crew undertook regular drill programs on board the vessels, such as fire drills.

As well as protecting their health, we strive to help employees to reduce stress levels and promote work-life balance. Some examples of our wellness initiatives in 2019 include:

- Provision of fitness and recreational equipment on board vessels, such as exercise bikes, treadmills, table tennis and weight training kits
- Encouraging employees who have not yet participated to take part in the Health for Life in Singapore (HELIOS) study led by Lee Kong Chian School of Medicine, in partnership with National Healthcare Group and Imperial College London, which offers comprehensive health screenings to participants for chronic disease research
- Encouraging employees to participate in the National Step Challenge initiated by Health Promotion Board, to promote a more active lifestyle
- Obtaining ECO Office certification, awarded by the Singapore Environment Council
- Encouraging employee sports sessions, such as fun walks, jogging, and football
- Organising employee events, such as our anniversary and festive lunch
- Promoting events that also include environmental aspects, such as the NTUC Income Eco Run

Investing in Employee Development

Performance Indicator	Performance in 2019	Target for 2020
Provision of programs for upgrading employee skills	• See our various programs below	Maintain a diverse and relevant training programme in our efforts to broaden and deepen the knowledge and experience of our employees Average training hours per employee of no less than 3 hours

Our employees are a key to our long-term success. We believe providing opportunities for our employees to develop both personally and professionally will not only result in a competent and motivated workforce, but also a positive and supportive culture. Samudera therefore offers its employees training opportunities and career development programmes to build up their functional and core competencies, helping us develop the essential capacities for growth.

Employees are encouraged to pursue training opportunities such as certified skills training programmes, industry seminar and conference, as well as courses to attain professional qualifications. Details on our Learning & Development policy are provided in the Employee Handbook. Financial sponsorship and leave are granted for eligible courses. Examples of training programmes offered in 2019 are illustrated in the table below. In the coming year, we will maintain a diverse and relevant training programme in our efforts to broaden and deepen the knowledge and experience of our employees.



Sustainability Report

Aspect	Training topic
Orientation	<ul style="list-style-type: none"> New Employee Orientation
Specialised training for crew	<ul style="list-style-type: none"> Formal familiarisation with management system ECO Insight DNVGL Navigator Insight DNVGL Plan Maintenance System NS5 Ship Safety Officer (SSO) ECDIS Type Specific Training Leadership for Seafarer Ship Certification Management Process Healthy Life ON-BOARD and Food Handling & Preparation
Training for employee	<ul style="list-style-type: none"> ISO Tank training Container Fires & Misdeclared Cargo International Maritime Dangerous Goods Listed Entity Director Essentials Director Financial Reporting Fundamentals Board Risk, Nominating, Remuneration Committee Essentials Payroll Module

Our Human Resources Department (HR) tracks and monitors the training records of employees. If the materials are found relevant for other employees, they will be kept in the library for future reference. We will continue to focus on adequate and quality training to equip our employees with the relevant knowledge and to upkeep their mindset on new development to improve on work productivity. In 2019, we have exceeded our average training hour per employee target with an average of 3.8 training hours per employee.

To support long-term career development, Samudera conducts annual performance and salary review for employees. The review evaluates employee performances, identifies development needs and helps employees to progress steadily towards their career goals.

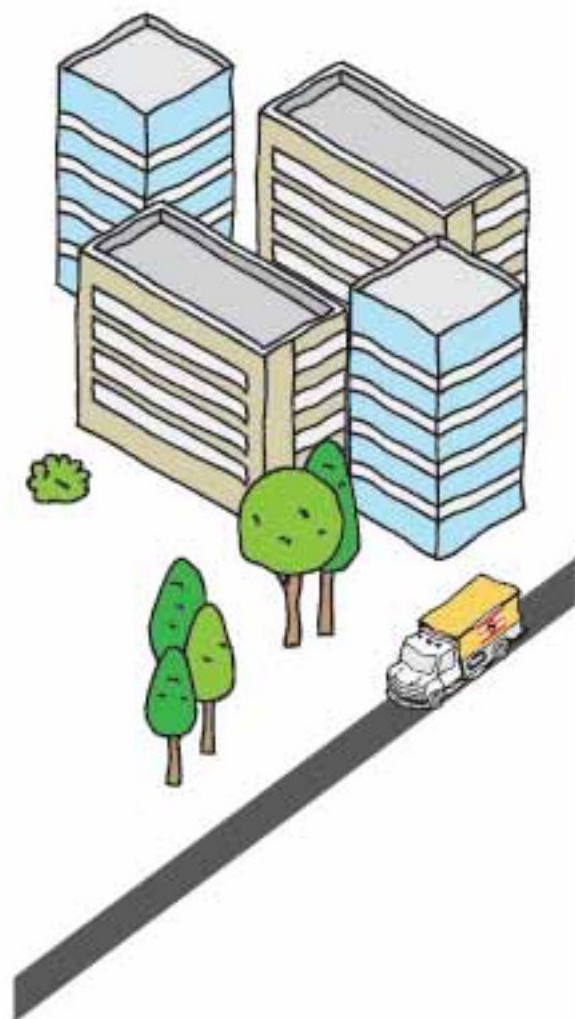
2019 Highlight:

Training Programs for Long-term Success

As we are expanding into the new business, such as transportation of ISO tank, we are re-skilling and upscaling our employees to fully equip them with the necessary knowledge needed in transporting the ISO tank. One example of specialised training provided in 2019 was a 2-day training session conducted by industry experts providing comprehensive knowledge of the market and day-to-day operation.

Maintaining a Strong Compliance Record

Performance Indicator	Performance in 2019	Target for 2020
Number of incidents of non-compliance with laws and regulations which resulted in significant fines or non-monetary sanctions	0 2019 Target achieved	Maintain zero incidents of non-compliance with laws and regulations resulting in significant ⁶ fines or non-monetary sanctions



⁶Significant cases are those resulting in a court case, imprisonment or fine above S\$100,000

A breach of any law or regulation could significantly affect our ability to operate, and the associated damage to our reputation would be significant. We strongly believe that our ability to maintain a strong compliance record directly translates into the long-lasting trust of our stakeholders and the strong performance of the Group. We recognise the importance of strong corporate governance and continue to strengthen our internal controls and risk management to adhere to relevant laws and regulations. This in turn also brings about greater transparency, accountability and integrity, which are vital for the long-term value creation of Samudera.

As a public listed company, we strive to be in compliance with all relevant laws and regulations. We uphold transparency, accountability, and integrity in conducting our businesses. These values are also disseminated to our employees through the Employee Handbook. Any significant misconduct or breach of law shall be seriously dealt with.

Strong corporate governance is essential in maintaining a strong compliance record. The National University of Singapore Business School publishes an annual Singapore Governance and Transparency Index, rating performance for Singapore-listed companies. In 2019, Samudera received an overall rank of #110 in this Index out of a total of 578 companies. Further details of our governance can be found in our Corporate Governance Report 2019.

Samudera does not condone any form of corruption or fraudulent behaviour. Our Employee Handbook provides clear guidance on anti-corruption and anti-bribery policies. Employees are informed about our whistleblowing policy and reporting channels, allowing employees to report any suspected unethical or illegal practices without the fear of reprisal. Any received report will be discussed, evaluated and documented in the quarterly Audit Committee meeting. Our Whistleblowing Policy is available on our website, while our whistle blowing channels can be accessed via whistleblow@samudera.id or via mail (to our office address). Access to these channels is restricted to the Head of Internal Audit and Chairman of Audit Committee. In 2019, there were zero whistle blowing reports.

Samudera actively identifies and manages its compliance risks across many relevant topics, including labour rights, safety practices, prevention of environmental pollution, licensing requirements, port clearance requirements, and taxation as well as listing rules. Our management, risk management and internal audit team monitors changes to the applicable laws and regulations and ensure our internal governance controls

stay relevant. We also provide training to our directors and selected employees to update them on significant new areas of law, as well as annual training on the prevention of money laundering and countering the financing of terrorism.

There were zero incidents of non-compliance which resulted in significant fines or non-monetary sanctions in 2019. We will continue to exercise strong governance and target to maintain zero incidents of non-compliance with laws and regulations which result in significant fines or non-monetary sanctions in 2020.

2019 Highlight: Enhancing Our IT and Data Protection Processes

All of our business activities are recorded in our database. We see the importance of building a solid IT infrastructure and security network in safeguarding our data and that of our customers, and in supporting and building our business activities.

We implement a firewall across our network to block unsolicited incoming network traffic. In addition, we have also implemented Cisco StealthWatch and Firepower to increase visibility and security intelligence, and to provide malware protection and an Intrusion Detection and Prevention System (IDPS). Combined, these devices detect any abnormal activities or intrusion events in our network and directly disconnect the suspect connection. We ensure regular updates to our hardware devices and firmware to maintain strong data protection.

In addition, we have engaged professional vulnerability tester to test-proof our network environment. Based on the test result, we are glad to share that there was zero vulnerability in our network.

There have been zero identified network breaches or leaks, thefts, or losses of customer data in 2019, and we have received no complaints concerning breaches of customer privacy.

Looking to 2020 and beyond, we have the intention to implement a 2-factor authentication for access to our network. This will further enhance our network security from intruders and reduce the risk of compromised passwords.

Sustainability Report

GRI Content Index

This report has been prepared in accordance to GRI Standards:
Core option.



GENERAL DISCLOSURES

Organisational Profile

102-1 (2016)	Name of the organisation	Annual Report page 1
102-2 (2016)	Activities, brands, products, and services	Annual Report page 1
102-3 (2016)	Location of headquarters	Annual Report page 1
102-4 (2016)	Location of operations	Annual Report pages 4-5
102-5 (2016)	Ownership and legal form	Annual Report (Financial) pages 123-124
102-6 (2016)	Markets served	Annual Report pages 4-5
102-7 (2016)	Scale of the organisation	Annual Report page 29 Total number of employees as of 31 December 2019: 137 • 131 Samudera HQ • 2 Foremost Maritime • 4 SILkargo Logistics
102-8 (2016)	Information on employees and other workers	As of 31 December 2019: Permanent employees: Total of 136 employees (48 male, 88 female) • 130 Samudera HQ (46 male, 84 female) • 2 Foremost Maritime (1 male, 1 female) • 4 SILkargo (1 male, 3 female) • 128 based in Singapore • 2 based in Malaysia • 6 based across Asia and the Middle East Temporary employees Total of 1 male contract employee at Samudera HQ in Singapore Employment type Total of 136 full-time employees • 130 Samudera HQ (46 male, 84 female) • 2 Foremost Maritime (1 male, 1 female) • 4 SILkargo (1 male, 3 female) Total of 1 male part-time or contract employee at Samudera HQ Data represent exact headcount. No significant portion of Samudera's activities is performed by workers who are not employees.
102-9 (2016)	Supply chain	Annual Report page 1
102-10 (2016)	Significant changes to the organisation and its supply chain	No significant changes to the structure, ownership, supply chain occurred during the financial year.
102-11 (2016)	Precautionary principle or approach	Samudera does not explicitly refer to the precautionary approach or principle in its Risk Management Framework.
102-12 (2016)	External initiatives	Annual Report pages 2-3
102-13 (2016)	Membership of associations	Samudera is member of various professional associations, including Singapore Shipping Association.

Strategy		
102-14 (2016)	Statement from senior decision-maker	Annual Report pages 8-11
Ethics and Integrity		
102-16 (2016)	Values, principles, standards, and norms of behavior	Annual Report page 1
Governance		
102-18 (2016)	Governance structure	Annual Report pages 14-28
Stakeholder Engagement		
102-40 (2016)	List of stakeholder groups	Annual Report page 40
102-41 (2016)	Collective bargaining agreements	There are no collective bargaining agreements in place.
102-42 (2016)	Identifying and selecting stakeholders	Annual Report page 40
102-43 (2016)	Approach to stakeholder engagement	Annual Report page 40
102-44 (2016)	Key topics and concerns raised	Annual Report page 40
Reporting Practices		
102-45 (2016)	Entities included in the consolidated financial statements	Annual Report (Financial) pages 80-85
102-46 (2016)	Defining report content and topic Boundaries	Annual Report page 38
102-47 (2016)	List of material topics	Annual Report page 38
102-48 (2016)	Restatements of information	There are no restatements of information.
102-49 (2016)	Changes in reporting	None
102-50 (2016)	Reporting period	1 January to 31 December 2019
102-51 (2016)	Date of most recent report	Sustainability Report 2018 was published in March 2019
102-52 (2016)	Reporting cycle	Every 12 months
102-53 (2016)	Contact point for questions regarding the report	sustainability@samudera.id or (65) 6430 1687
102-54 (2016)	Claims of reporting in accordance with the GRI Standards	Annual Report page 38
102-55 (2016)	GRI content index	Annual Report pages 48-50
102-56 (2016)	External assurance	External assurance was not sought for this report



Sustainability Report

GRI Content Index

This report has been prepared in accordance to GRI Standards:
Core option.

MATERIAL TOPICS

Economic Performance

103-1 (2016)	Explanation of the material topic and its Boundary	Annual Report page 41
103-2 (2016)	The management approach and its components	Annual Report page 41
103-3 (2016)	Evaluation of the management approach	Annual Report page 41
201-1 (2016)	Direct economic value generated and distributed	Annual Report page 41

Environmental Compliance

103-1 (2016)	Explanation of the material topic and its Boundary	Annual Report pages 41-43
103-2 (2016)	The management approach and its components	Annual Report pages 41-43
103-3 (2016)	Evaluation of the management approach	Annual Report pages 41-43
307-1 (2016)	Non-compliance with environmental laws and regulations	Annual Report pages 41-43

Training and Education

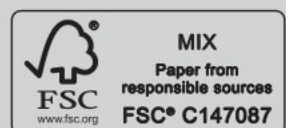
103-1 (2016)	Explanation of the material topic and its Boundary	Annual Report pages 45-46
103-2 (2016)	The management approach and its components	Annual Report pages 45-46
103-3 (2016)	Evaluation of the management approach	Annual Report pages 45-46
404-1 (2016)	Average hours of training per employee per year	Annual Report pages 45-46
404-2 (2016)	Percentage of employees receiving regular performance and career development reviews	Annual Report pages 45-46

Occupational Health and Safety

103-1 (2016)	Explanation of the material topic and its Boundary	Annual Report pages 43-44
103-2 (2016)	The management approach and its components	Annual Report pages 43-44
103-3 (2016)	Evaluation of the management approach	Annual Report pages 43-44
403-2 (2018)	Occupational health and safety management system	Annual Report pages 43-44
403-2 (2018)	Hazard identification, risk assessment, and incident investigation	Annual Report pages 43-44
403-3 (2018)	Occupational health services	Annual Report pages 43-44
403-4 (2018)	Worker participation, consultation, and communication on occupational health and safety	Annual Report pages 43-44
403-5 (2018)	Worker training on occupational health and safety	Annual Report pages 43-44
403-6 (2018)	Promotion of worker health	Annual Report pages 43-44
403-6 (2018)	Prevention and mitigation of occupational health and safety	Annual Report pages 43-44
403-9 (2018)	Work-related injuries	Annual Report pages 43-44

Socio-economic Compliance

103-1 (2016)	Explanation of the material topic and its Boundary	Annual Report pages 46-47
103-2 (2016)	The management approach and its components	Annual Report pages 46-47
103-3 (2016)	Evaluation of the management approach	Annual Report pages 46-47
419-2 (2016)	Non-compliance with laws and regulations in the social and economic area	Annual Report pages 46-47 No significant cases of non-compliance with laws and regulations



2019 Annual Report

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