Contents

**Introduction**
01–05
- Foreword by the CEO 01
- Governing progress on sustainability 02
- Determining our material issues 04
- Our sustainability strategy 05

**Systemic issues**
06–17
- Systemic issues require leadership and collaboration 06
- Enabling trade through projects and advocacy 08
- Taking the lead on climate change 10
- Tackling corruption 12
- Exploring solutions for ship recycling 14
- Global partnerships for change 16

**Managing impacts**
18–31
- Managing impacts of our businesses 18
- Respecting human rights 20
- Protecting our people 22
- Reducing the risk of labour disputes 25
- Building an inclusive mindset 26
- Moving on tax transparency 27
- Managing environmental risks and compliance 28
- Strategic change in responsible procurement 30

**Community engagement and investment**
32–35
- Community engagement and investment 32
- Skills and resources applied for the common good 34

**Assurance and performance data**
36–38
- Independent assurance report 36
- Performance data 37

**About the report**
The report covers activities in the calendar year 2015. Our approach to reporting is to focus on material issues and activities, in line with stakeholder concerns and relevance in terms of context, completeness and balance. We strive for optimal accuracy, timeliness, clarity and reliability in the way we communicate.

It is possible to access the Group’s Sustainability accounting principles and previous year’s data on our website, where our Communication on Progress to the UN Global Compact is also available. Please go to www.maersk.com/sustainability.
The Maersk Group is a worldwide conglomerate operating in 130 countries. In addition to owning one of the world’s largest shipping companies, the Group is involved in a wide range of activities in ports, logistics, and the oil and gas industries.

### Maersk Line
- A leading global container shipping company
- Revenue: USD 23.7bn
- Employees: 32,750

### Maersk Oil
- An international oil and gas exploration and production company
- Revenue: USD 5.6bn
- Employees: 4,427

### APM Terminals
- A global port operator
- Revenue: USD 4.2bn
- Employees: 21,171

### Maersk Drilling
- A specialist in offshore drilling for oil in ultra-harsh and deepwater environments
- Revenue: USD 2.5bn
- Employees: 3,965

### APM Shipping Services
- A provider of shipping-related services through four industry leading business units
- Revenue: USD 5.1bn
- Employees: 18,366

### Maersk Container Industry
- A manufacturer of dry containers, refrigerated containers and refrigeration units
- Revenue: USD 691m
- Employees: 4,750

---

**2015 Cash outflow distributed Revenue USD**
- 2015: 40.3bn
- 2014: 47.6bn

**Profit USD**
- 2015: 925m
- 2014: 5.2bn

**Employees 2015**
- 2015: 88,355
- 2014: 89,207

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**Our Values**
- Consistent Care
- Uprightness
- Humbleness

---

**Relative Group CO2 improvement 2010–2015**
- 23%

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**Number of fatalities**
- Target: Zero

---

**Reduction in facilitation payments**
- (2014 baseline)
- 2015: 34%

---

**Employee engagement score**
- 76%

---

**Number of oil spills**
- Above 10 m³
- 2015: 3

---

**Loss time injury frequency**
- Maersk Supply Services: 0.53
- Damco: 0.13
- Maersk Tankers: 0.63
- Maersk Drilling: 0.13

---

**Lost time injury frequency**
- Average CO2 reduction per container (2007 baseline)
- 22

---

**Transferred containers**
- 2013: 11
- 2015: 7
- 2014: 4

---

**Production facilities across the world and 1 R&D centre**
- 3 12,000
- 22 Oil spills

---

**Industries**
- 42%
- 72%
- 76%
- 73%
- 24%
The current business environment is harsh for the industries in which we operate. In spite of this, there should be no doubt that our commitment to sustainability in our businesses is unaltered, as is our commitment to the United Nations Global Compact.

While the Group is in good shape, we too need to adjust to the market outlook in order to stay competitive. On this basis, we have had to say goodbye to employees mainly in Maersk Oil, Maersk Supply Service, Maersk Drilling and Maersk Line. In line with our Group Core Values, we try to provide support through these transitions.

Sustainability is business
Sustainability is not a luxury. It is a responsibility and a precondition for long-term competitiveness. To the Executive Board the responsibility is personal. It is our obligation to deliver our Company and our Name in better shape than when we stepped onto the bridge.

The high levels of trust and engagement shown by our employees are an essential element in reaching our goals.

We welcome the global deal reached in Paris during COP21 which is an important step towards ensuring that global warming stabilises below 2 degrees Celsius. Future growth must occur while simultaneously containing climate change. We continue our decoupling of growth in traded volume and CO₂ emissions in Maersk Line, our container shipping business, through investments in new vessels, retrofitting of older ones and enhanced planning. We do this as a matter of principle and because it makes business sense.

A continuous effort to reach zero
The Maersk Group has two areas on which our target is to reach zero. These are the areas of work-related fatalities and major oil spills. We are not satisfied with our performance on either.

In 2015, 7 people died while working for us. These fatal accidents occur in spite of our sustained prevention efforts through the work of our substantive and dedicated safety organisation. The fate of each of these people is deeply unsettling to me, and I want to assure all our employees’ families that we will continue to press forward to reach our ultimate target: to return all our people home safely at the end of the working day. This continues to be our highest sustainability priority.

We had three larger oil spills in 2015, which were contained and cleaned up when they occurred. Our analysis shows that spills mainly occur when work processes are not followed. An increased focus on process safety, which may help in avoiding spills in the future, is in progress across the Group’s businesses.

Improvements in partnership
A number of sustainability issues related to our industries require thought leadership and the creation of the knowledge, partnerships and collaboration necessary to induce real change.

Today, the majority of ships are dismantled and recycled at facilities on beaches. Here, the standards and practices often do not adequately protect the people working at the facilities and the natural environment. We have decided to play a role in changing this situation. Alone and in partnership with others, we will work to upgrade conditions at recycling facilities on the beaches in the Alang area, India, while we remain committed to responsibly recycle our own ships and rigs.

Opportunity for growth
The coming year will be challenging for our businesses, but also one with ample opportunity for those who are prepared to seize the many opportunities presented. As a competitive Group with a highly engaged workforce and performing in volatile markets this is what we will do to unlock growth – for the company and for society.
Governing progress on sustainability

Sustainability governance is needed to ensure high-level accountability and decision-making that will allow us to fulfill our ambitions, manage our risks and address the expectations of stakeholders.

Our main governance and supervisory body is the Sustainability Council. It reports directly to the Executive Board and oversees progress on the Group’s sustainability strategy. The Sustainability Council’s functions are laid out in a charter:

- To oversee compliance with the Group’s sustainability standards and policies in the Commit framework (see governance framework graphic below).
- To endorse sustainability strategies and positions and to keep track of the most prominent movements on sustainability across the Maersk Group.
- To guide execution of approved strategies and positions.
- To prioritize and approve projects related to the execution of the 2014–2018 Sustainability Strategy within the investment framework provided by the Group Executive Board.

Each of the Group’s operating businesses has established governance structures to implement and manage sustainability. Management is held accountable for this through biannual reporting and CEO reviews (see next page).

The Sustainability Council’s 2015 actions included updates on the core Group sustainability programmes (Anti-Corruption, Responsible Procurement, Global Labour Relations and Diversity & Inclusion), approval of the Group’s position on the global cap on sulphur oxides, discussion of sustainability criteria in M&A, approval of enabling trade projects and development of a global education pipeline model, the viability of which will be discussed and determined during 2016. A Group safety update is the first topic on the agenda at each of the Council’s four annual meetings.

Members of the Council
The Sustainability Council has seven members representing key Group Functions and businesses. Their deep knowledge of our businesses makes for insightful discussions, direction setting and decision-making.

In 2015, the Sustainability Council members were:

- Claus V. Hemmingsen (Chairman and member of the Group Executive Board) and also CEO of Maersk Drilling
- Carol McDiarmid, acting Head of Legal and CSR in Maersk Oil
- Morten H. Engelskroft, CEO of APM Shipping Services
- Kevin Furniss, VP of HSSE APM Terminals
- Søren Toft, COO of Maersk Line
- Annette Stube, Head of Group Sustainability
- Steen Karstensen, Head of Group Procurement
- Morten H. Engelstoft, CEO of APM Shipping Services
- Maersk Drilling,

The Sustainability Council debates, sets direction and decides on future actions on our material sustainability issues.

Establishing oversight on progress
To support the implementation of decisions and progress on sustainability ambitions, the Council is provided with a compliance and performance dashboard twice a year.

The Sustainability Council is where the interests of business and sustainability are aligned across the Maersk Group for optimal outcomes.”

Claus V. Hemmingsen
Chairman of the Sustainability Council

The dashboard provides an overview of performance on key indicators related to Group targets and progress on sustainability integration in the businesses. It also shows status on implementation of centrally driven programmes, including where relevant, compliance as determined by the Commit assurance process (see figure on right).

Categories in the dashboard are: safety, CO₂ emissions, oil spills, anti-corruption, responsible procurement, global labour relations, diversity and inclusion, and sustainability integration in the business units.

Overseeing CEO Reviews
Group Sustainability every year conducts reviews of the business’ progress and performance on sustainability. These are based on informed dialogue between business CEOs and sustainability staff and Group Sustainability. Each business is reviewed every second year. In 2016, reviews were performed in Maersk Oil, Svitzer, APM Terminals and Maersk Line. Results of the reviews are reported to the Sustainability Council and to the Executive Board.

Below: The Sustainability Council debates, sets direction and decides on future actions on our material sustainability issues.

Sustainability governance framework 2015

- Executive Board
  - Sustainability Council*
    - Approves and oversees positions, projects and strategies
  - Group Sustainability
    - Oversees management of sustainability
    - Develop, implement and monitor strategies, positions and projects
  - Group Functions
    - Own and drive the Commit Group Rules
  - Business Units
    - Develop governance processes and structures to integrate sustainability
    - Manage sustainability risks and commercial relationships
    - Implement programmes to comply with the standards and policies in the Commit Framework

* Compliance with Commit items is the subject of an annual assurance process.
** Utilized approved and oversees global labour relations and diversity policies and programmes.
Assessing materiality

The materiality of issues to the Maersk Group is assessed through a process that considers issues that pose a risk to our business, and/or that affect our stakeholders due to the impact of our activities. The result is a list of issues which is then assessed in terms of importance to our business and our stakeholders. We integrate input from stakeholders by leveraging contributions from issue owners and businesses, who regularly engage with stakeholders relevant to their area of work.

In September 2016, a materiality calibration workshop was conducted in which this year’s assessments were discussed with issue owners. The conclusions from this workshop were compared to materiality assessments conducted by the business units to ensure alignment.

The subject of personal safety is fundamental to our stakeholders, including anti-corruption and aspects of human rights, remain the issues which are of highest concern to both business and stakeholders.

Knowing what our most material issues are helps us focus our reporting on what is important to our business and our stakeholders.

Diversity and inclusion was assessed as growing in importance due to increased risk of legal liabilities in some jurisdictions and a better understanding of the issue’s effect on Group opportunities, reputation and brand.

Strong safety measures, avoidance of major oil spills, and ensuring responsible business practices, including anti-corruption and aspects of human rights, remain the issues which are of highest concern to both business and stakeholders.

Importance to A.P. Moller - Maersk

Maersk Group materiality matrix 2015

Informing our reporting

The materiality matrix shows the relative importance of the issues assessed on their impact on cost, revenue, compliance and reputation, and correlating this with the estimated level of importance to employees, customers, regulators, the media, investors, local communities and NGOs. The matrix informs our reporting as we mainly report on issues in the top right quadrant, but also include issues or obligations linked to our commitment to the UN Global Compact and regulation.

Changes from 2014 to 2015

Recycling of ships grew in importance to our business and stakeholders, which is reflected in both actions and reporting by the Group on this subject.

Unlocking growth

Why we do it

By raising the bar on energy efficiency, we can respond to a global challenge, supporting the need to decouple economic growth from CO₂ emissions while lowering our cost. See page 10–11.

Our sustainability strategy focuses on three areas of opportunity where we can accelerate the positive impacts of our business: enabling trade, climate change, and education.

In 2016, we reduced CO₂ emissions, progressing toward our Group target and decoupling growth in volume from CO₂ emissions. We also participated actively in partnerships and high-level advisory groups on carbon emissions in transportation.

In the area of enabling trade, we continued our work in three pilot projects and enhanced our advocacy of the WTO trade facilitation agreement.

We mapped and evaluated current investments in education and developed a model for upgrading the skill levels of a country: the viability of which will be determined during 2016.

The strategy also stipulates that we will continue to integrate sustainability in our operations, mitigate risks and improve performance levels. Our progress is described throughout the chapters in this report.

The ambition of our 2014–2018 sustainability strategy is to enable growth through trade and education while limiting transport’s impact on climate change.

Change in drivers of progress

Two years into the strategy period we are making adjustments to the sustainability strategy as a result of learnings achieved and changing framework conditions.

While we originally designed the evolution of and target setting for the three themes (enabling trade, climate change, and education) to follow the same format, this approach is now less relevant. Whereas the key drivers for the enabling trade work are growth and innovation, climate change is driven by cost reduction and for education the original driver has changed along with the business climate in the energy sector. Consequently, we will have different approaches to the three themes going forward and are changing our approach to scaling up the projects from model to solution delivered in our businesses.

Maersk Group materiality matrix 2015
Systemic issues require leadership and collaboration

Acknowledge, commit, act, lead, and collaborate. Five key concepts in tackling issues where our own actions will be insufficient to mitigate the risks to our business objectives or to maximise synergies between business growth and creation of societal value.

For some sustainability issues, change at a systemic level is the only way to effectively address and solve the issue. In order for this to occur many actors will have to move in the same direction at the same time. In addition to their systemic nature, they pose material risks to the individual businesses’ objectives and they are issues that stakeholders believe are at least in part our responsibility. To simultaneously meet our responsibilities, mitigate risks and enhance opportunities, we need to take actions in our own business that allow us to demonstrate leadership. Only then can we legitimately and knowledgeably participate in the building of broad coalitions or in other ways collaborate to begin to address the issue at a systemic level.
Enabling trade through projects and advocacy

Trade is a key driver of growth and development and a core element in our sustainability strategy to unlock growth for countries and communities.

World Bank research has shown that no country in the last 50 years has sustained high levels of growth and significantly increased incomes without greatly expanding trade. However, there are many systemic challenges in unlocking growth, which create myriad bottlenecks holding back the expansion of trade.

Maersk Line has approximately 15% capacity market share in global container shipping. APM Terminals is the third-largest port operator in the world and Damco handles logistics services for some of the world’s largest companies. In spite of these facts, actions we take in our own business will not begin to solve the systemic problems involved in enabling trade. Only if other parties get involved, will meaningful change be possible.

The Maersk Group’s position allows us to take the lead in understanding how to enable trade. We have for some years now investigated the effect of trade and infrastructure investments on economic development. We have studied the impact of APM Terminals presence in Apapa, Nigeria, the effect of establishing new trading routes in Latin America with specialised vessels, the impact of liner connectivity on growth in China and trade services in India. With these studies, we have begun to build a repository of knowledge that we can bring to the table when trade is on the agenda.

Advocating trade facilitation

The World Trade Organization’s (WTO) Trade Facilitation Agreement (TFA) from 2013 is by all accounts clearer than ever before to coming into force. The Maersk Group has been vocal in its support of this agreement, which aims to reduce non-tariff barriers to trade and allow more small and medium-sized enterprises and economies to engage in global trade, creating business opportunities for which our future revenue depends.

Why this matters to society

According to the WTO, every dollar invested in trade support can create or save between $20 and $50 US dollars of exports. Experts create jobs and increased incomes provide benefits to society and opportunities for development.

Why this matters to the Maersk Group

Close to 75% of the total Maersk Group revenue is related to global trade. Allowing barriers to trade will allow more small and medium-sized enterprises and economies to engage in global trade, creating business opportunities in which our future revenue depends.

Our ambitions

We will enable trade through building partnership tools that will allow trade facilitation, allowing us to promote opportunities for growth beyond those provided by our everyday business.

Our progress

Broad stakeholder support will allow trade facilitation, and significantly increase incomes without greatly expanding trade.

Making progress on three pilot projects

We continue to work on the pilot projects initiated in 2014. These are focused on improving processes and procedures for trading across borders and improving local businesses’ ability to access global markets.

A digital Shipping Information Pipeline in East Africa

The overall objective of this project is to enable East African business participation in regional and global trade. Together with our partner TradeMaek East Africa, in 2014 we mapped the current 306 different and often paper-based communication interactions between 30 individuals or organisations involved in the transport of goods from East Africa to Europe. This mapping showed that the cost of time spent on documentation processes is equal to the actual shipment costs. To remove the documentation barrier to trade, we are now piloting a shared, cloud-based digital document exchange infrastructure (a Shipping Information Pipeline). TradeMark East Africa secured broad endorsement with relevant stakeholders in 2015, allowing us to create ownership and a governance structure for the project. With this in place, we began piloting the Shipping Information Pipeline. The Maersk Line Technology Innovation team, Group Sustainability, and Maersk Line in Kenya are involved in the project.

Evaluating traders through ConnectAmericas

Small and medium-sized enterprises (SMEs) only constitute a small fraction of global exports, yet they are key enablers of economic growth and development. Using social media, ConnectAmericas wants to empower SMEs in the Americas to participate in international trade. Some of the key obstacles they face are lack of access to education in trade procedures, reliable information and business contacts.

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“Transport and logistics costs in East Africa are on average still between 50 and 60% higher than in the US and Europe. Reducing trade costs and allied processes will help enable East African companies to improve business competitiveness and provide access to trade for millions in the region.”

Frank Matsaert

CEO, TRADEMark East Africa

The project is owned and run by the Inter-American Development Bank with main partners from Google, DHL, Visa and AlliAbra. In 2015, Maersk Line’s intra-Americas shipping line, Sealand, signed a Letter of Intent with the Inter-American Development Bank and began the development of training and information programmes for inclusion in the platform. Our contribution will include information on areas such as logistics planning and customs procedures. At first, this is directed at Colombia, Mexico and Peru, with information prepared for these specific countries. We will also include guidance on price levels for goods transport, to allow companies to better understand their total cost of trade and thus competitiveness on international markets. We expect the training modules to be publicly available in 2016.

Developing a trading hub in East Indonesia

The area of Bitung in East Indonesia, has been earmarked for development by the country’s government. One measure applied is to establish Bitung as a hub for shipping communications to global markets. In support of these plans and activities, the Alliance for the economic development of Bitung was officially established in late 2010, when a Letter of Intent was signed between relevant ministries and the Maersk Group.

The alliance investigates the two most prevalent commodities in the area, tuna and coconuts, to document the challenges in the exporting of these products, including clearance, terminal handling and regional as well as global connectivity of the Bitung area. The alliance intends to improve the port, support local manufacture, create jobs and possibly invest in infrastructure. When the Bitung project is documented and the effects established, the actions can be replicated in other locations.

“With ConnectAmericas, SMEs will have tools to release their export potential and grow to the benefit of people and societies.”

Matias Bendeksky

Chief of Partnerships and Resource Mobilization Unit, Inter-American Development Bank
Taking the lead on climate change

The Maersk Group continued to reduce CO2 emissions while growing our business in 2015. Based on our learnings from this decoupling, we advocate and advise on the role of transport in limiting climate change.

Why this matters to society
Climate change, if not mitigated, will be vastly disruptive to the global society, in terms of development, livelihoods and the natural environment.

Why this matters to the Maersk Group
CO2 emissions are directly linked to the Group’s bunker fuel costs ($3 billion in 2015) and are such an important part of our business, our customers and investors. Disruptions caused by climate change could have severe impact on our business, our employees and the communities where we work.

Our ambitions
The Maersk Group CO2 reduction target: 10% relative reduction in 2020, compared to 2010. Maersk Line, which accounts for 84% of the Group’s total emissions, targeted a 10% reduction in CO2 emissions per container moved by 2020 (2007 baseline).

Our progress
Maersk Group’s relative CO2 reduction across the Group has declined by 25% in 2015 (2% reduction in 2015).

Maersk Line’s CO2 emissions per container moved declined by 4.9% compared to 2014, and 4.5% compared to 2007.

Next steps
Further roll out of carbon pricing.
Increased focus on climate change resilience.

Carbon pricing in focus
We are evaluating the best means of integrating carbon pricing across our businesses. In Maersk Oil all major projects sanctioned in 2015 assessed CO2 emissions and prioritizing pricing was included in the analysis of an investor’s sensitivity to carbon pricing regulations.

We believe that establishing a global carbon pricing scheme could be instrumental in ensuring a level playing field that will enable competition on the basis of carbon performance. This will only be the case, however, if the scheme has global coverage or in other ways addresses the issue of higher costs in regions where carbon pricing is implemented.

Progress on reduction targets
CO2 emissions at group level grew in absolute numbers, but we are on track to achieve the Group target of a relative reduction in CO2 emissions of 30% in 2020 compared to 2010 baseline. By the end of 2015, a 23% reduction was achieved in total.

Maersk Line’s target is to reduce CO2 emissions per container moved by 10% by 2020, compared to a 2007 baseline. Even in times of low oil prices, a reduction of 42% was reached.

Simultaneously, Maersk Line saw growth in volume transported, sustaining the decoupling of CO2 emissions and trade volumes. We also maintain our estimated 10% lead in CO2 efficiency compared to industry benchmarks.

The main contributors to Maersk Line’s continuous reductions in CO2 emissions are operational optimisation through network and data efficiencies, new more efficient vessels coming into service and retrofitting of existing vessels. Our Triple-E vessels made up an estimated 5 per cent of the reductions achieved in 2015. A retrofitting initiative raises the bridge on 18 Maersk Line vessels allowing for an extra layer of containers, which reduces emissions.

Decoupling volume transported and CO2 emissions

<table>
<thead>
<tr>
<th>Year</th>
<th>Global CO2 emissions (tonnes)</th>
<th>CO2 emissions per container moved (tonnes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>3.6</td>
<td>130</td>
</tr>
<tr>
<td>2011</td>
<td>3.3</td>
<td>125</td>
</tr>
<tr>
<td>2012</td>
<td>3.1</td>
<td>120</td>
</tr>
<tr>
<td>2013</td>
<td>2.9</td>
<td>115</td>
</tr>
<tr>
<td>2014</td>
<td>2.7</td>
<td>110</td>
</tr>
<tr>
<td>2015</td>
<td>2.5</td>
<td>105</td>
</tr>
</tbody>
</table>

The graph shows actual development in absolute reductions in CO2 emissions at growing volumes transported by Maersk Line.

Maersk Tankers reduced emissions by 23% in 2015, mainly through a focus on energy use in ports, where consumption fell by 6.9% (2014 baseline). Maersk Oil’s CO2 emission levels grew due to a general increase in production activity, while CO2 efficiency numbers improved in 2015.

Bringing in customers
In 2014, Maersk Line entered into the first carbon pacts, which are multi-year agreements with a customer committing Maersk Line to a tailored CO2 target in alliance with the customer. For example, Maersk Line and Philips signed a five-year Carbon Pact in 2015, with Maersk Line undertaking to cut CO2 emissions by 20% for every Philips container moved between 2016 and 2021, as well as integrating CO2 and other sustainability indicators into the commercial supplier relationship.

Global engagement and positioning
Essential to unlocking solutions to systemic changes is the building of coalitions and partnerships.

For the Maersk Group, this began in 2019 by engaging with the IMO, Carbon War Room, a global coalition leading transparency in the shipping sector on its CO2 footprint. We further pursued this goal through the Clean Cargo Working Group, a business-to-business initiative on the environmental impacts of marine container transport. We also support the Caring For Climate initiative, a UN-driven framework for business leaders who set goals, develop strategies and practice, and publicly disclose emissions. A sizeable share of recent years’ emissions reductions in the container shipping industry have been achieved through slow steaming, made possible by alterations to the ship’s engines. The Group made the development of those in partnership with engine manufacturers and shared them freely with the rest of the industry.

Engaging in global debate
The International Maritime Organisation (IMO) puts shipping’s global share of emissions at 2.2%. The Group is engaged in activities to push for a level playing field regulation of CO2 emissions in the shipping sector, which needs to be global, fair, regional and not burden only movers. As such, we were disappointed that shipping was not included in the Paris agreement approved at the COP21. We will sustain our engagement in the issue in the IMO and UNFCCC going forward.

We are encouraged by the UN Secretary General’s, Ban Ki moon, statement that he wants transport as a focal point for the next years. We are dedicated members of Ban Ki moon’s high-level cross sector panel on sustainable transportation, advising him on how to bring sustainable transport to the forefront of the development agenda since 2014, and look forward to being part of producing the first UN global outlook report on sustainable transportation under the auspices of the Secretary General.

Tackling corruption

Corruption is one of the most serious risks we face as a global business. Many of the Maersk Group’s operations are in countries where the risk of corruption is high, including demands for facilitation payments despite these being illegal in most parts of the world. In line with our values, we conduct our business in an upright manner.

Corruption is a systemic issue with customs and practices deeply ingrained in societies and communities. These practices are not easily altered and taking a stand can, in many cases, result in significant consequences (see case story on the next page). We work to reduce and eliminate facilitation payments, which are commonplace in the shipping and logistics industries. To increase the likelihood of success, we were instrumental in creating a collaborative forum to combat corruption in the maritime industries. However, such actions are only legitimate if companies can show credible improvements in their own performance.

Significant reduction in facilitation payments Facilitation payment demand remains a challenge for some parts of our businesses in some parts of the world. As such, they remain a focus area for our anti-corruption compliance programme. At the end of 2015, facilitation payments made by the Group’s shipping and logistics businesses had been reduced by 34% compared to 2014.

Site visits performed The Group Legal department, often together with compliance teams from the businesses, conducted 12 individual site visits in business unit facilities in Bangladesh, India and Vietnam, and business unit headquarters in Denmark. In 2015, Businesses involved were Maersk Line, Damco, Maersk Supply Service, Maersk Drilling, and Maersk Line as well as APM Terminals, Damco, Maersk Supply Service, headquarters in Denmark, in 2015. Businesses involved were APM Terminals, Damco, Maersk Supply Service, Maersk Drilling, and Maersk Line. These visits were supplemented with site visits performed by the business and local regulatory authorities.

Collaborating for change Elimination of facilitation payments requires commitments from governments, international organisations, the private sector and individuals. Recognising this necessity, Maersk Line in 2011 initiated the Maritime Anti-Corruption Network (MACN) together with eight like-minded peers from the shipping industry. In 2012, MACN was formally established as a network of vessel-owning companies and others across the maritime supply chain. MACN promotes good corporate practices in the maritime industry for tackling bribery. Facilitation payments and other forms of corruption, and collaboration with local governments and other actors to identify and mitigate the root causes of corruption in the industry. The Maersk Group chairs MACN which today has grown to over 65 participating companies.

Corruption undermines growth and social and economic development. As an obstacle to trade and undermining clean and fair businesses, it creates costly business interruption, difficulty in planning and executing business activities, which reduces societies’ ability to grow and prosper.

Why this matters to society Corruption undermines growth and social and economic development. As an obstacle to trade and undermining clean and fair business, it creates costly business interruption, difficulty in planning and executing business activities, which reduces societies’ ability to grow and prosper.

Our ambitions Pursuing the Group’s 2016–18 compliance strategy we will:

- Continue to integrate compliance into daily business.
- Enhance efforts through support and assurance. Strengthen external stakeholder engagement.

Our progress 34% reduction in facilitation payment (2014 baseline). 11,034 employees in total trained in anti-corruption across the Group (9,976 in 2014). Eleven audits and spot checks performed. Ten communication efforts. Next steps Continued focus on facilitation payment reductions line with the Group’s target.

Why this matters to the Maersk Group Eliminating corruption is in line with Group values, necessary to comply with legal obligations and required by our customers, employees and the society in which we operate.

Why this matters to society Corruption undermines growth and social and economic development. As an obstacle to trade and undermining clean and fair business, it creates costly business interruption, difficulty in planning and executing business activities, which reduces societies’ ability to grow and prosper.

Our ambitions Pursuing the Group’s 2016–18 compliance strategy we will:

- Continue to integrate compliance into daily business.
- Enhance efforts through support and assurance. Strengthen external stakeholder engagement.

Our progress 34% reduction in facilitation payment (2014 baseline). 11,034 employees in total trained in anti-corruption across the Group (9,976 in 2014). Eleven audits and spot checks performed. Ten communication efforts. Next steps Continued focus on facilitation payment reductions line with the Group’s target.

Our progress

Execution of the 2016–18 compliance strategy.
Exploring solutions for ship recycling

Ship recycling is a heavily debated issue known to attract great stakeholder attention, mainly due to work practices on beaches. Media coverage of such beaching facilities has pointed to issues with child labour, frequent fatalities and only little control over spills of oil and chemicals. To many, ship recycling has become synonymous with hazardous waste, environmental degradation.

Out of a total of 768 ships dismantled globally in 2015, 469 – representing 74% of the total gross tonnage (GT) scrapped – were sold to facilities on the three beaches with ship recycling yards in India, Pakistan and Bangladesh. Despite our and other shipowners’ insistence on responsible recycling there has been no change in practices.

The right policy – but costly and limited

Since 2009 it has been the Maersk Group’s policy to only recycle ships responsibly. This policy was reconfirmed in 2015. Currently, this is only possible in a limited number of yards in China and Turkey. On average, using one of these yards has an added cost of up to two million US dollars per recycled vessel.

Also, our policy does not consider the fact that the majority of our vessels are sold off before they reach end of life. These vessels are not necessarily recycled responsibly, and some stakeholders have claimed that we employ double standards by accepting these actions.

An ageing fleet inspires action

The number of vessels up for recycling by Maersk Group companies has been limited for the past decade, but in the next five years a larger number of assets owned by the Group will reach end of life.

Using only responsible recycling facilities is estimated to incur extra costs of more than 150 million US dollars, compared to using upgraded facilities in India. Moreover, new regulation of the area from the EU is also expected, and further down the line the Hong Kong Convention on ship recycling might enter into force.

Investigating the options

Driven by this situation, the Group conducted two visits at upgraded beaching facilities in Alang, India in 2015. Conditions at these yards were compared to criteria in the Hong Kong Convention and the proposed EU Ship Recycling Regulations, combined with the Group’s Third Party Code of Conduct criteria for anti-corruption, labour and human rights as well as subcontractor matters.

The main conclusion was, that an upgrade to meet the necessary criteria would be possible depending on the commitment of the facilities themselves and the local governments.

Taking action on our own

As a consequence, the Group Sustainability Council decided that the Group should initiate engagement with a number of carefully selected yards in Alang, India. We will work directly with these to upgrade their practices to comply with our standards.

We will engage with facilities as they receive our ships for recycling by having Maersk Group-employed staff on-site to ensure upgrading of facilities.

Recycling in 2015

Maersk Drilling recycled one drilling rig at a recycling facility in China. Maersk Supply Services and Maersk Line recycled one vessel each at facilities in Turkey. All facilities meet our requirements for ship recycling and the work was supervised by an independent third party.

Why this matters to society

More than 70% of all ships reaching end of life globally are recycled on beaches, where serious challenges exist to improve current negative environmental and societal conditions.

Why this matters to the Maersk Group

With an ageing fleet, we need more options to recycle ships cost-efficiently and responsibly. Regulatory developments further put pressure on our industry to push for global availability of responsible practices.

Our ambitions

To make more responsible recycling facilities available, regardless of location and method applied.

Our progress

Development of a standard, combining the Hong Kong Convention and the Group’s Third Party Code of Conduct demands.

Next steps

Upgrade selected ship recycling facilities in Alang, India.

Initiate upgrade of the greater Alang area.

Take an active role in promoting responsible recycling actions, regardless of method and location.
Global partnerships for change

We collaborate on a range of subjects and with a range of partners.

Successful resolution of sustainability issues will newly occur through the power of the individual company, state, NGO etc. Only when joining forces can significant change take place and alter the premises and solutions space for those involved. Established partnerships may break down traditional barriers of competition or space for those involved.

Joining forces can significant change take for the individual company, state, NGO etc. Only when partners come together to explore how they can join forces to achieve an ambitious target.

On these pages are some of the most significant global, partnership-based initiatives and organisations in which the Maersk Group participates.

UN Global Compact

As a member of UN Global Compact programme, the Maersk Group has joined other companies striving to further the development, implementation and disclosure of responsible and sustainable corporate policies and practices.

Clean Cargo Working Group

Maersk Line participates alongside other leading cargo carriers and customers in the Clean Cargo Working Group (CCWG) to tackle sector-related systemic issues in climate change response. Members share the vision of environmental performance improvements in marine container transport through measurement, evaluation, and reporting on cargo-related emissions.

Maritime Anti-Corruption Network

The Maersk Group was responsible for initiating the Maritime Anti-Corruption Network (MACN) in 2011 – the first of its kind within the maritime industry – in a bid to foster a collaborative approach towards stamping out the systemic issue of corruption and enable fair trade to benefit society at large. It promotes good corporate practice in the maritime industry for tackling bribes, facilitation payments, and other forms of corruption.

World Economic Forum

World Economic Forum (WEF) is an international institution working to improve the state of the world through public-private cooperation. The Maersk Group interacts with WEF through high-level meetings, research networks and task forces, involving political, business, academic and other leaders in collaborative efforts to shape global agendas on global challenges.

Caring for Climate

Caring for Climate

The Maersk Group is a supporter of the Caring for Climate initiative, which mobilises business leaders to implement and recommend climate change solutions and policies. Supporters set climate change goals, develop strategies and practices, and publicly disclose emissions. The initiative has 447 supporters and is jointly convened by the United Nations Global Compact, the secretariat of the United Nations Framework Convention on Climate Change and the United Nations Environment Programme.

UN High-level Advisory Group on Sustainable Transport

The Maersk Group is part of the UN Secretary-General Ban Ki-moon’s High-level Advisory Group on Sustainable Transport, working with governments, transport providers, businesses, financial institutions and civil society to tackle the systemic issue of climate change by finding viable solutions to promoting public health and safety, environmental protection and economic growth through sustainable transport.

World Ocean Council

The Maersk Group is a member of the World Ocean Council, a cross-sectorial industry alliance collaborating on stewardship of the world oceans, e.g. improving ocean science in support of safe and sustainable operations, engaging in ocean policy and planning, and developing science-based solutions to environmental challenges.

Extractive Industries Transparency Initiative (EITI)

The EITI is a global standard for the governance of a country’s oil, gas and mineral resources, implemented by governments, in collaboration with companies and civil society to combat the systemic issue of corruption. Maersk Oil supports the EITI as part of its transparency and anti-corruption activities.

Logistics Emergency Teams

As part of the Logistics Emergency Teams, led by the United Nations World Food Program (WFP), the Maersk Group is working with governments and IFTI partners, Agility and UPS, to provide emergency support in the form of logistics in the event of a large scale natural disaster.

Sustainable Shipping Initiative

Maersk Line joined other leading companies from the shipping industry forming Forum for the Future’s Sustainable Shipping Initiative (SSI). The coalition works to achieve a vision of a shipping industry that is both profitable and sustainable by 2040.
Managing impacts of our businesses

When Maersk Group employees are at work, they are very often at open sea using heavy machinery to complete tasks that if not carried out with great care and foresight could result in significant harm to people and the natural environment.

Moreover, we are a global company that have to ensure that we treat our employees with respect, and as a minimum, in line with local and international legislation and conventions. At the same time, employees in all locations around the world must be urged to act in line with the Maersk Group’s values and rules for responsible business conduct.

Our approach to dealing with these challenges is to run programmes that integrate the management of our material issues into our businesses’ operations. We acknowledge that our work on these issues will never be done and remain dedicated to be continuously improving our performance.
Respecting human rights

Having undertaken human rights due diligence process, we will further review five issues to better address the risk of Maersk Group activities having adverse human rights impacts.

To identify issues within or linked to our operations with potential to have adverse human rights impacts, we conducted a human rights due diligence exercise based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) in all the Group’s businesses in 2015. This assessment was done with the expert support of The Danish Institute for Human Rights.

Two perspectives on risk

When analysing human rights issues in our due diligence process and decision making actions, we distinguish between two different approaches risk, as traditionally understood in a business context, and responsibility, in line with how risk is defined in the UNGPs.

As a business, our corporate risk management approach assesses legal, financial and operational risks among others, to understand how we can prevent or mitigate risks to human rights. Human rights due diligence allows us to understand how we could potentially be involved with adverse impacts through our business and value chain, and the extent to which we have a responsibility to act based on our involvement and leverage.

An appropriate response will address our involvement by acting in an upright manner, in line with our corporate values and based on our ability to bring about positive change.

Prioritising human rights issues

In the due diligence process we sought to look at activities and business relationships across our value chain, which have the greatest potential to cause, contribute or be linked to severe human rights impacts. We then prepared a priority list of five issues for further assessment (see box on right). Being on this list indicates that our due diligence process has shown that the issue, while currently managed on an ad hoc basis, requires either further review or a more systematic and consistent approach across the businesses.

In addition to these five issues, other areas of concern were identified but not included in the priority list, because other programmes in the Maersk Group already work to manage these. Examples of this are trade union relations, which are being addressed by the development of, for example, a container terminal. These processes are often carried out by local authorities or business partners, challenging the Group’s ability to ensure respect for human rights in alignment with The Maersk Group’s values and international standards.

Our five 2016–17 priority human rights issues

- **Asset under Construction:** In this key supplier category, some of the most common risks to human rights refer to the safety and employment conditions of sub-contracted workers, for example, vessels, rigs or terminals.
- **Indirect hiring and recruitment:** Recruiting workers and crew through third parties (hiring and employment agencies, local agents or partners), has been identified as a risk due to lack of direct control and daily oversight of the human rights of workers often recruited across multiple countries, for example, how they are hired and paid, if they have adequate visas or if personal documents are held back.
- **Transportation and services to/from conflict zones:** The Maersk Group’s global presence also means it is vulnerable to be used for improper and illicit trade and transportation which may constitute a risk to human rights.
- **Use of security services:** The Maersk Group’s businesses may utilise security services to protect assets and people, in transport and storage, in high-risk and conflict settings. While serving as a protection, deployment of security services may also constitute a risk to human rights if not executed properly.
- **Land acquisition and resettlement:** Resettlement and economic displacement are of great concern to the individuals and local communities affected by the development of, for example, a container terminal. These processes are often carried out by local authorities or business partners, challenging the Group’s ability to ensure respect for human rights in alignment with The Maersk Group’s values and international standards.

Maersk Oil and Maersk Tankers conducted a pilot project to map and assess their existing grievance mechanisms. One of the outcomes of the assessment was that the development of a tool that will allow our businesses to map and assess their existing grievance mechanisms.

In 2016 (see page 12), it, among other things, makes it possible for internal and external parties to use this channel to report a larger scope of human rights concerns, e.g. actions harming persons, their livelihood or properties, child labour, human trafficking and forced labour, related to our operations or our suppliers, contractors, or other business partners.

Next steps

Develop action plan on prioritised issues for 2016–17.

Roll out tool to assess grievance mechanisms.

Maersk Oil and Maersk Tankers conducted a pilot project to map and assess their existing grievance mechanisms. The tool was developed in line with the UN Guiding Principles on Business and Human Rights. This enables processing of human rights concerns through the Group’s whistleblowing system.
Protecting our people

Safety is the most material sustainability issue in the Maersk Group. Staying safe in the industries and environments that we work in requires excellent safety management and procedures. Our license to operate depends on it.

Concerted efforts to improve our safety performance continued throughout 2015 with activities in our businesses, each of which has dedicated organisations pursuing detailed safety plans and targets. We aim to have a strong safety culture and see safety as a core element of our operations.

Port terminals in focus on fatalities

Although the Group strives to have zero fatalities, we regret that 7 employees lost their lives during our operations in 2015. We are working urgently to address this and will not consider our efforts adequate until accidents of this kind are eliminated in our activities.

In 2014, 11 fatalities occurred. In 2015, regretfully 7 fatalities occurred as part of operations in the Maersk Group.

Maersk Oil's goal is to eliminate high-potential incidents in operations and raise performance compared to peers, and Maersk Oil's operating units each developed a five-year process safety plan in 2015. The plans focus on four global themes: process safety management, standardised risk management principles, operations, and equipment. For example, Maersk Oil's major improvement programme for 2016 centres around Control of Work with heavy focus specifically in the areas of operating discipline and assessment of risks.

Why this matters to society

Our employees and their families should expect that working for the Maersk Group allows you to return home safe at the end of a workday.

Our ambitions

Zero fatalities

Our progress

In 2015, 7 fatalities occurred as part of operations in the Maersk Group.

Next steps

Increase cooperation and knowledge sharing on process safety across businesses.

Enable Group wide standardised incident investigation.

Organise Group wide Global Safety Day.

Explore opportunities to align training across the Group’s businesses.

Fatalities in 2015

<table>
<thead>
<tr>
<th>Business Location</th>
<th>Description</th>
<th>Employed by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambia</td>
<td>Driver crushed by own truck at warehouse loading dock.</td>
<td>Third party</td>
</tr>
<tr>
<td>Maersk Training</td>
<td>Training coach dead from fall between two rig levels</td>
<td>Maersk Training</td>
</tr>
<tr>
<td>APM Terminals</td>
<td>Security guard crushed between two containers during unloading of vessel.</td>
<td>Contractor</td>
</tr>
<tr>
<td>APM Terminals</td>
<td>Security guard crushed between two trucks entering the port.</td>
<td>Contractor</td>
</tr>
<tr>
<td>APM Terminals</td>
<td>Security guard struck by moving trailer.</td>
<td>Contractor</td>
</tr>
<tr>
<td>APM Terminals</td>
<td>Dockworker crushed by a top loader on passing through loading area.</td>
<td>APM Terminals</td>
</tr>
<tr>
<td>Svitzer</td>
<td>Engineer caught between hulls during mooring alongside other tug.</td>
<td>Svitzer</td>
</tr>
</tbody>
</table>

Managing impacts | Safety

Next steps

Maersk Oil's goal is to eliminate high-potential incidents in operations and raise performance compared to peers, and Maersk Oil's operating units each developed a five-year process safety plan in 2015. The plans focus on four global themes: process safety management, standardised risk management principles, operations, and equipment. For example, Maersk Oil's major improvement programme for 2016 centres around Control of Work with heavy focus specifically in the areas of operating discipline and assessment of risks.

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Managing impacts | Safety

Next steps
Personal safety performance improves in most businesses

The number of lost-time injuries and the frequency of these injuries improved in 6 of our businesses compared to 2014. Improvements were also contributed to targeted efforts such as Maersk Drilling’s Team Zero and Maersk Line’s SAFIR campaign. Maersk Line’s new safety strategy has shown promising results with seafarer LTIF decreasing more than 20%. Maersk Oil’s LTIF rate improved by 20% compared to 2014, assisted by the roll-out of the Incident Free Refresher programme and focus on improved contract management. In Svitzer, sustained communication, top management commitment and systems integration explain improvements, while the significantly lower rate of lost-time injuries in Maersk Supply Service, was driven by a focus on Stop Work Authority and an improved risk assessment tool. Maersk Tankers recorded its lowest number of lost-time injuries to date, due to a sustained and detailed oriented focus over many years. In APM Terminals, the LTIF rate grew as reported cases increased and man hours worked fell due to downtimes. Maersk Container Industry saw more incidents because production was increased in the company’s new factory in Chile, necessitating a period of adjustment among the many new workers. In Damco staff globally held office team discussions followed by staff managed office safety audits.

Safe from external harm

As our employees engage with the world as part of their job, sometimes in conflict zones, their safety might be affected. The Group manages such risks in accordance with rules in our governance system on crisis management and travel security and through local security plans. In all countries defined as localized in risk areas, an evacuation plan covering all Maersk Group organisations in the area must be in place. We did not evacuate offices in 2015. In beginning in 2016, we will operate a security incident reporting system, monitoring issues in five categories: acts of terror (including acts of terror or piracy), other acts of crime (threats and smuggling among others), access breach, financial security (fraud and money laundering, for example) and information security (could be hacking or hoaxes).

For travel related risks, the Group has a comprehensive system that provides e-learning modules about travel security and medical and security information as well as the ability to track employee travelling based on their ticket information. In 2015, we recorded 17 labour stoppages in our operations. After the introduction of a new Maersk Group global labour stoppages reporting tool in June 2015, eight were analysed using the tool. We estimate the commercial impact on business of these stoppages to be more than 4 million dollars. We also carried out an analysis of potential adverse impacts on human rights from our labour practices. The process of analysing the results is ongoing, and the potential outcomes will be addressed in our businesses if relevant.

The labour relations framework

We began the roll-out of the Global Labour Relations Framework across the Group in 2015. The framework serves to further constructive and productive labour relations with employees and their representatives, ensuring that labour relations and labour conditions serve the interests of both employees and company. It sets guidelines for how management should engage with employees and their representatives, introduces a reporting tool for labour issues, offers training in labour relations and negotiations, and strengthens the alignment and knowledge sharing across different businesses.

Building, sharing and using what we know

Knowledge, experiences and regulations and negotiations, was introduced in 2015. Furthermore, 94 people completed the e-learning modules on our global labour relations framework. The total number of people trained increased by 175% in 2015. In other effort to distribute best practices, we establish communities of practice on labour relations. At the end of 2016 we had these six groups covering the Middle East/ North Africa, Latin America and in West Africa. Members are typically human resources workers, labour relations specialists or operations managers.

Safety performance

Lost-time injury frequency per business 2014 2015

<table>
<thead>
<tr>
<th></th>
<th>APM Terminals</th>
<th>Maersk Drilling</th>
<th>Maersk Line</th>
<th>Maersk Oil</th>
<th>Maersk Supply Service</th>
<th>Maersk Tankers</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.94</td>
<td>0.31</td>
<td>0.57</td>
<td>0.71</td>
<td>0.73</td>
<td>0.13</td>
</tr>
<tr>
<td></td>
<td>(0.43)</td>
<td>(0.20)</td>
<td>(0.27)</td>
<td>(0.27)</td>
<td>(0.73)</td>
<td>(0.18)</td>
</tr>
</tbody>
</table>

Local strategies for stable business

The Maersk Africa community of practice on labour relations is an example of how collaboration and best practice sharing can bring about the results we aim to achieve with the global labour relations framework. One of the objectives of the framework is to implement a clear vision and strategy on labour relations at local level. The businesses in the community of practice all operate along the East-West shipping route. This region is of strategic importance for the Maersk Group’s businesses. The many changes in the region after the so called Arab spring also impacted the labour environment. In several countries new trade unions were created and the area became a focal point for the International Transport Workers Federation. At a workshop in Cairo, Egypt in November 2015, the participating businesses, APM Terminals, Maersk Oil, Maersk Line, Svitzer and Damco, discussed the companies’ different approaches to labour relations in the region. This resulted in a commitment by all companies to develop their own labour relations practices and strategies in line with the global labour relations framework and adapted to local circumstances.

A clear vision and strategy in place sets direction and enables leadership and proactivity on labour relations. Also, they provide the ability to share the direction and purpose with employees and their representatives, as opposed to a more reactive approach to labour relations where communication and discussion are primarily requested by employees or when changes to business operations. We believe that this will have a positive influence on the relationships between employers and employees which in turn increases the likelihood of stable operations and reduces the risk of commercial damages.
Building an inclusive mindset

Allowing all of our employees to reach their potential is important for The Maersk Group’s ability to be competitive and reach its goals.

We set targets for the share of women and nationalities in management and use these to drive our aspirations towards becoming a more diverse company. In 2015, we set new targets due to an internal restructuring process.

As a consequence, we concluded on the previous targets set in 2013. We reached our target for nationalities in management enabled by our new talent pipeline for senior levels of management. We reached two of the three targets set for women in management.

Managing our biases

In most cases, bias is entirely unintentional. The Maersk Group wants to overcome such unconscious biases that influence our actions. To that end, a new e-learning programme was launched to help employees understand the biases they may hold and how to manage these in decision-making.

Introducing the diversity dashboard

The introduction of a new diversity dashboard in 2015 helped us to identify current and future challenges around gender and nationality diversity. Beginning in April 2016, this dashboard will be provided with a quarterly dashboard measuring underlying factors impacting the progress on diversity targets. Also, Group HR will conduct quarterly dashboard reviews with the businesses. The goal is to locate challenges and instigate actions to overcome these.

Why this matters to society

Equality across work environments, gender, nationality, beliefs, etc., enable all individuals to fulfill their potential which supports growth and stability in society.

Why this matters to the Maersk Group

Competing in a global marketplace requires global perspectives. The Group needs to be able to attract and retain employees in all the locations it operates in and benefit from the diversity of thought.

Our ambition

Our ambition is to build a diverse and inclusive work environment where everyone can reach their potential.

Our progress

See separate table with overview of targets and performance.

Next steps

Launch and promotion of global maternity retention programme

Continue to roll out inclusive leadership and unconscious bias tools across the organization.

Increase our focus on accelerating women and growth market leaders in senior roles.

Build momentum within the business units through the diversity dashboards.

Moving on tax transparency

Civil society, national regulators, OECD, UN and responsible investors are advocating for multinational companies to increase transparency on their tax affairs, including where profits are made and where taxes are paid.

During 2015, the Maersk Group was actively engaged in this dialogue and prepared for an increase in transparency on the Group’s tax matters, in accordance with new regulatory demands.

Participating in tax dialogues

The Group continues its participation in forums debating corporate taxation, as it is our interest to increase clarity and reduce misunderstandings over the subject. Through dialogue we aim to ensure that the debate on transparency and fair tax is based on facts regarding international tax systems and corporate practices.

We share experiences and practices with NGOs, politicians and other stakeholders and follow the developments in international and national tax legislation by liaising with tax authorities, academics and advisors, e.g. via the International Fiscal Association’s Tax Committee of the International Chamber of Commerce and the EU Joint Transfer Pricing Forum. The Maersk Group contributes to the work of the UN Committee of Experts on the international taxation of shipping.

In Denmark, the Group participate in “The Tax Dialogue” together with other companies, investors and academics to develop a shared understanding on tax, transparency and responsibility. Subjects discussed were the tax system and structures and the use of offshores financial centres, and the link between tax and value creation. The Tax Dialogue project is led by the NGO IEBS.

Updating our tax policy

In 2015, we began a review of the Group’s tax policy in light of the developments of international taxation and the OECD’s Base Erosion Profit-Shifting project (BEPS). The policy was updated as needed to ensure compliance with best practice as reflected in BEPS.

To ensure that our practices is in alignment, a comprehensive review of the Group’s more than 1,000 companies in approximately 130 countries was initiated. Corporate structures will be modified as required following this review and in accordance with our tax policy. We do not expect major restructurings.

Preparing for mandatory reporting

Disclosure of tax payments on a country-by-country basis in the annual report will be mandatory for Maersk OS for the financial year 2016, in accordance with the EU Accounting Directive. Further, the Group is preparing for the non-public country-by-country reporting to tax authorities for all our business units, which will also become mandatory for the financial year 2017. 

The change for reporting of Maersk OS (Maersk Line) is not deductible against taxable income, leading to a very high tax for the year compared to the result in 2014.

Tax payment

(USD million)

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Profit before tax</td>
<td>6,620</td>
<td>5,311</td>
<td>1,447</td>
</tr>
<tr>
<td>Tax</td>
<td>3,217</td>
<td>2,972</td>
<td>522</td>
</tr>
<tr>
<td>Tax as percentage of profit before tax</td>
<td>49%</td>
<td>56%</td>
<td>36%</td>
</tr>
</tbody>
</table>

For more information, see our Tax Reporting section.
Transportation and energy are industries with high potential impact on the environment. Consequently, our activities are closely monitored and regulated.

The main environmental issues for the Maersk Group are oil spills, ballast water emissions and air emissions. Nearly all of our businesses have activities where the risk of oil spills must be avoided and mitigated.

Mitigating the risk of oil spills

Contrary to our ambition of zero oil spills, in 2015, three spills above 10m³ occurred as well as 23 smaller spills “below 10m³”. The three spills above 10m³ were:

- Maersk Drilling experienced a 75m³ mud spill of which 20m³ were oil in relation to Maersk Drilling’s work in the North Sea. Bulk transfer work practices and supporting procedures were entirely revisited and the elimination of spills in the company-wide initiative was enhanced. Fleet-wide environmental KPIs were introduced with greater focus on eliminating spills, and data analysis strengthened.
- Svitzer’s vessel ‘Svitzer Grand Bahama’ experienced a 13m³ spill into the harbor in Freeport, Bahamas during an internal fuel transfer. The spill was cleaned up and subsequent investigations showed the root cause to be human errors. Svitzer updated procedures and risk assessments which were communicated across the company’s vessels. A training programme on internal fuel transfers and bunkering is under development.
- Other incidents: In March 2015, the Maersk Tankers vessel, Carla Maersk, was involved in a collision with a bulk carrier in the Houston Ship Channel in Texas, USA. Carla Maersk sustained a breach to two ballast water tanks and one cargo tank containing Methy Tertiary Butyl Ether. A salvage plan was successfully implemented. The official investigation of the incident is ongoing.

New sulphur emission limits in force

The emission of sulphur oxides into air has been proven detrimental to human health and for this reason a 0.1% limit on sulphur in fuel has been in force for all emission control areas (ECAs) since January 1, 2015. The existing ECAs cover the Baltic Sea, the North Sea, the English Channel, most of the US and Canadian coast and parts of the Caribbean. For the Maersk Group, the cost of compliance with the 0.1% limit is around 300 million US dollars per year, based on a price premium of around 0.20 US dollars per tonne of 0.1% fuel.

Maersk Drilling continues to hold exploration licences in the Barents Sea and plans are in place at this point in time.

Engagement in the Arctic unchanged

The Maersk Group’s activity-level in the Arctic is low. Engagement in the Arctic has been installing systems on new-builds, and will cost of relevant parts of the fleet which approval and convention ratification is in place.

Maersk Oil has no concrete activities planned. Engagement in the Arctic is fully recognised and we respect that the sanctity of nature and peoples in this region must not be compromised.

Maersk Oil’s continues to hold exploration licences in the Barents Sea in Norway and off the coast of North West Greenland. Opportunities are currently being evaluated in the current green environment. Maersk Oil has no concrete activities planned.

Macers Drilling continues to explore possible drilling solutions for the Arctic area. No specific plans are in place at this point in time.

Maersk Tankers continues to deliver various types of refined oil products to Greenland in line with the five year contract entered into force in 2015.

Managing environmental risks and compliance

In 2015, Maersk OIL as part of its process safety work programme, reviewed oil spill contingency plans, to ensure that plans and access to equipment are adequate. The management of this risk is continuously improving.

Besides the impact on the environment, oil spills cause loss of reputation and are stressful to the employees involved. Neither risk is acceptable to us.”

Robert Uggla
CEO of Svitzer

Maersk Drilling experienced a 75m³ mud spill of which 20m³ were oil in relation to Maersk Drilling’s work in the North Sea. Bulk transfer work practices and supporting procedures were entirely revisited and the elimination of spills in the company-wide initiative was enhanced. Fleet-wide environmental KPIs were introduced with greater focus on eliminating spills, and data analysis strengthened.

Svitzer’s vessel ‘Svitzer Grand Bahama’ experienced a 13m³ spill into the harbor in Freeport, Bahamas during an internal fuel transfer. The spill was cleaned up and subsequent investigations showed the root cause to be human errors. Svitzer updated procedures and risk assessments which were communicated across the company’s vessels. A training programme on internal fuel transfers and bunkering is under development.

Why this matters to society

A healthy, clean and well-functioning natural environment is highly valued by many people, and also underpins human health, life and livelihoods.

Why this matters to the Maersk Group

As a responsible company in line with our values, we want to protect the natural environment from the impacts of our activities. Furthermore, there are very material risks related to non-compliance of regulation of this area, and reputational damages from failure to live up to relationships expectations.

Our ambitions

Zero oil spills.

Compliance and preparedness for regulation through technological innovation and participation in relevant forums and partnerships.

Our progress

Three spills above 10m³, 20 spills below 10m³.

482,000 tonnes of SO2 emitted.

755,000 tonnes of NOx emitted.

Why this matters to society

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After 2015, mitigating the risk of irresponsible business conduct in our supply chain revolves around suppliers in 10 high-risk categories.

We interact with more than 100,000 suppliers every year in more than 100 countries. Out of these we have a contractual relationship with more than 20,000 companies. Based on our list of high-risk categories, we narrow this group down to between 1,500–5,000 suppliers, and assess these using a combination of audits, self-assessments and documentation reviews.

Depending on the outcome of these assessments we work to improve on findings. We have a small group of suppliers with whom we have recurring business with high monetary value, allowing for a closer relationship and cooperation over sustainability issues. These are all part of our responsible procurement programme.

A tighter focus

The Maersk Group’s Responsible Procurement programme underwent a change of strategy in 2015. From focusing on high spend and critical suppliers, we will focus on suppliers in high-risk categories. By changing the strategy we aim to achieve a better risk coverage and more effective process for identifying and making improvements.

In collaboration with the businesses, Group Procurement established a list of 10 categories with the highest risk of negative impact (see the list on right). We define a high-risk category as having high risk of severe social or environmental impact when sourcing, producing, or delivering to us either directly or through subcontractors.

To align with this new approach, we have prepared a guide for each of the high-risk categories, with an overview of the common social and environmental risks related to each category. For example the risk of unacceptable working conditions for subcontractors related to assets under construction; the risk of violation of minimum wage requirements related to ‘cleaning and canteen services’ and the risk of harms to others related to the category ‘security companies’. Input was compiled through stakeholder consultations, on-site audits, and CSR documentation reviews of more than 1,300 Maersk suppliers.

Overview of the 10 categories with highest risk of negative social or environmental impact:

<table>
<thead>
<tr>
<th>Assets under construction</th>
<th>Manning and crewing agencies</th>
<th>Security companies</th>
<th>Chemicals and paint</th>
<th>Cleaning and canteen services</th>
<th>Classification and certification*</th>
<th>Warehousing and distribution</th>
<th>Promotional items</th>
<th>Logistics and transportation</th>
<th>Raw materials</th>
</tr>
</thead>
</table>

In August 2015, the Maersk Group received a letter co-signed by four NGOs expressing their concern over working conditions for subcontractors at a shipyard with whom Maersk Line has placed an order for ships. We take enquiries made by external stakeholders seriously and in line with our established process entered into dialogue with the NGOs. The outcome of this dialogue was an agreement that the NGOs’ concerns were related to ‘cleaning and canteen services’ and the risk of harms to others related to the category ‘security companies’. Input was compiled through stakeholder consultations, on-site audits, and CSR documentation reviews of more than 1,300 Maersk suppliers.

Learning from new contracts in high-spend categories

In relation to the Maersk Third Party Code of Conduct requirements, the matters most commonly identified were related to enforcement of safety awareness and overtime compensation for subcontractors. We have learned from earlier audits that sub-contractor working conditions can be a concern in relation to shipyards. For some time now, the Maersk Group has worked to establish a robust process around sustainability issues in procurement of large spend items in high-risk categories, for example vessels and ships. We trust that the changes in policies approved in 2015 will accommodate this need in the future (see next page).

Timing is a challenge

In 2014 and 2015 we identified 86 suppliers with critical findings, and 641 suppliers with major findings. While 100% of the suppliers with critical findings have an improvement plan, only 63% of suppliers with major findings have an improvement plan. The reason for this discrepancy between existing plans and suppliers with major findings is the challenges related to making and closing implementation of improvements.

Making global supply chains more inclusive

Small and medium-sized (SME) enterprises find it more challenging to implement the policies, systems and improvements that we require. To address this challenge, a new approach of collaborating with suppliers was tested when Maersk Linas and Maersk Drilling involved local UN Global Compact representatives in workshops for SME suppliers in Turkey and Ghana, respectively.

Getting in at the beginning

We addressed this timing challenge in 2015, by making it mandatory for The Maersk Group’s buyers to establish an improvement plan with a supplier in a high-risk category with major and critical findings already at the contract signing. This process will be implemented in early 2016 and will enable us to have a closer dialogue with suppliers early in the relationship and to have sufficient time to monitor implementation of improvements.

Overview of the 10 categories with highest risk of negative social or environmental impact:  

- Assets under construction  
- Manning and crewing agencies  
- Security companies  
- Chemicals and paint  
- Cleaning and canteen services  
- Classification and certification*  
- Warehousing and distribution  
- Promotional items  
- Logistics and transportation  
- Raw materials

*Organizations establishing and maintaining codes of conduct for suppliers of different nature.
Community engagement and investment

In all corners of the earth, as here in the streets of Bogota, Colombia, the Maersk Group businesses connect with the daily lives of people and countries. Communities depend on us to deliver energy and goods and enable their participation in global trade, and we on them for business and employees and stable business conditions.

In light of this close relationship between the Maersk Group and global and local communities, we engage and invest in activities that are not rooted in a specific strategic objective but in the responsibility that comes from being able to make a difference through our business activities.
Upgrading vocational skills

The reach and breadth of our business creates many touch points with communities and their challenges. We engage when we have something unique to offer.

Upgrading vocational skills

Unlocking growth – for society as well as for the Maersk Group – requires a skilled and competent workforce. In many parts of the world, this relies in part on a skilled and competent workforce. In many parts of the world, this requires an investment in vocational technical education, particularly through training teachers and developing curriculum, and in expanding access to technical educational opportunities for underrepresented populations, particularly women. To achieve significant reach and impact, such an initiative will require co-funding as well as close engagement of development and implementation partners both at global and national levels. Final determination of project viability will take place in 2016.

Funding the projects is a priority for the Maersk Group, the business case for investing in education has changed since the launch of the sustainability strategy in early 2014, as markets previously characterised by high economic growth have slowed down, and the outlook for the oil industry is more challenging. Growth remains a priority for the Group, but primarily through acquisitions rather than organically. Investing in skills development, however, supports the societies where we operate and remains an important added benefit for our businesses in the longer term.

Locally, Maersk Group businesses are already engaged in a large number of education initiatives around the world. We currently invest in over 100 local projects in support of educational goals. The scope of the projects ranges from small-scale local community projects to the Group’s global cadet training.

Investing in education projects across the Maersk Group

111 projects across nine businesses and 33 countries

AFM Terminals and Maersk Oil have the highest number of projects.

Strongest geographical presence of projects is in Qatar, Angola, Brazil, USA and the UK.

Main target group for the projects is university students.

The bulk of the projects are either local community projects or CSR initiatives such as university scholarships.

Lending a hand – or ship – to refugees

In response to the refugee crises related to the ongoing war in Syria the Maersk Group assisted in rescuing people in need in the Mediterranean Sea and made donations.

However the Group’s main contribution to the lives of refugees from this area, continues to be the search for rescue operations in the Mediterranean Sea. It is estimated that more than 100,000 refugees have crossed the Mediterranean to reach Europe in the course of 2015. Maersk Group ships have assisted in rescuing 5,704 refugees since the beginning of 2014, 1,805 in 2015 alone.

The Maersk Group follows international maritime law and crew(s) participate diligently when asked to take part in rescue operations at sea.

In September of 2015, the Group and The AD Moller and Chastain Mc-Kinney Moller Foundation dedicated 2 million Danish Kroner (close to 300,000 USD) to a national drive to gather financial support for the ongoing operation to save lives in the Mediterranean Sea.

The Tai Pan - Maersk Line and Damco provided support to World Food Programme partners working in Nepal after the two earthquakes, donating 40 containers and transportation. Use of the containers as intermediate storage options were vital in order to reach the populations in more remote and hard-to-reach areas where pre-existing structures were either lost in the quakes or used for temporary shelter for the affected people.

Collecting data to help protect oceans and coastlines

The Maersk Group joined the World Ocean Council in 2011, and contributes to scientific research by participating in the tsunami detection project as well as the Smart Oceans – Smart Industries (SO-SI) programme.

The Tsunami detection project aims to enable accurate and rapid detection and assessment of tsunamis, which is critical for effective mitigation. The project equips commercial vessels with geodetic GPS systems to take advantage of the vast ocean infrastructure they represent. This creates a cost-effective tsunami monitoring network. In 2015, six Maersk Group vessels were equipped with GPS systems, together with four vessels from other parties. In the 50-75 programme, data is collected on physical oceanography marine ecosystems and biodiversity. The biggest purpose of the programme is to facilitate collaboration between the scientific/ocean observing community and the shipping and other ocean industries.
To the readers of the Sustainability Report 2015

We were engaged by the Management Board of A.P. Moller - Maersk A/S (further 'the Group') to provide assurance on the Sustainability Report 2015 (further 'The Report'). The Management Board is responsible for the preparation of The Report, including the identification of material issues. Our responsibility is to issue an assurance report based on the engagement outlined below.

Scope

Our assurance engagement was designed to provide limited assurance on whether The Report is presented, in all material respects, in accordance with the reporting criteria.

We do not provide any assurance on the achievability of the objectives, targets and expectations of the Group.

Procedures performed to obtain a limited level of assurance are aimed at determining the plausibility of information and are less extensive than those for a reasonable level of assurance.

Reporting criteria and assurance standard

The Group applies internally developed criteria as described in the Group's sustainability accounting principles 2015. It is important to view the performance data in the context of these criteria. We believe these criteria are suitable in view of the purpose of our assurance engagement.

We conducted our engagement in accordance with the International Standard on Assurance Engagement (ISAE) 3000: “Assurance Engagements other than Audits or Reviews of Historical Financial Information”. This standard requires, among others, that the assurance team possesses the specific knowledge, skills and professional competencies needed to provide assurance on sustainability information, and that they comply with the requirements of the Code of Ethics for Professional Accountants of the International Federation of Accountants to ensure their independence.

Work undertaken

Our procedures included the following:

• A risk analysis, including a media search, to identify relevant sustainability issues for the Group in the reporting period.
• Reviewing the suitability of the reporting guideline, including conversion factors used.
• Interviewing management at corporate and business level responsible for the sustainability strategy, management and reporting.
• Interviewing relevant staff and reviewing internal control procedures on the data in The Report.
• Conducting an analytical review of the data and trend explanations submitted by all business units for consolidation at corporate level.
• Evaluating internal and external documentation, based on sampling, to determine whether the information in The Report is supported by sufficient evidence.

Conclusion

Based on the procedures performed, as described above, nothing came to our attention to indicate that the The Report is not presented, in all material respects, in accordance with the reporting criteria.

Amsterdam, 10 February 2016

KPMG Sustainability
Part of KPMG Advisory NV.

Wim Bartels
Partner

Copenhagen, 10 February 2016

KPMG
Statsautoriseret Revisionspartnerselskab

Henrik O. Larsen
State Authorised Public Accountant
### Performance on social, environmental and economic indicators

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Maersk Line</th>
<th>Maersk Tanks</th>
<th>Maersk Drilling</th>
<th>Maersk Supply</th>
<th>Maersk Terminals</th>
<th>Maersk Tankers</th>
<th>DAMCO</th>
<th>APM Terminals</th>
<th>Maersk AEP</th>
<th>APM Terminals</th>
<th>Maersk SVITZE R</th>
<th>MAERSK OIL</th>
<th>APM Terminals</th>
<th>Maersk Drilling</th>
<th>MAERSK OIL</th>
<th>APM Terminals</th>
<th>Maersk Drilling</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Revenue</strong> (USD million)</td>
<td>23,729</td>
<td>2,740</td>
<td>1,022</td>
<td>1,977</td>
<td>1,066</td>
<td>1,066</td>
<td>1,066</td>
<td>1,066</td>
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<tr>
<td><strong>Number of employees</strong></td>
<td>40,308</td>
<td>3,890</td>
<td>2,327</td>
<td>1,296</td>
<td>1,300</td>
<td>1,300</td>
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<tr>
<td><strong>Gas fuels (1,000 tonnes)</strong></td>
<td>683</td>
<td>755</td>
<td>234</td>
<td>251</td>
<td>263</td>
<td>263</td>
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</tbody>
</table>

*Note: The table above provides a detailed overview of the performance on social, environmental, and economic indicators for various businesses. The data includes metrics such as revenue, profit, number of employees, and various energy and emissions indicators. The data is presented in a clear, organized manner to facilitate easy comparison and analysis.*
Maersk Group has tailored the external financial reporting specifically towards the needs of our different stakeholders with two annual publications. The **Annual Report** has a focus on the detailed legally required information, whereas the **Group Annual Magazine** has a focus on providing an overview of key developments during the year. The publications can be read individually or combined depending on our stakeholders’ interests.

The Annual Report is available electronically in English on [http://investor.maersk.com/financials.cfm](http://investor.maersk.com/financials.cfm). The Group Annual Magazine provides an overview of the operations and performance of the Maersk Group in a concise and easy-to-read format. The publication is not a substitute for the Annual Report and does not contain all the information needed to give as full an understanding of the Maersk Group’s performance, financial position and future prospects as provided in the Annual Report. The Group Annual Magazine is available in hard copy and electronically in English and Danish on [http://investor.maersk.com/financials.cfm](http://investor.maersk.com/financials.cfm).

Maersk Group also produces **Interim Reports** for each of the first three quarters of the year. **Presentations** tailor made for investors and the financial markets are also uploaded every quarter.

Maersk Group also hosts a **Capital Markets Day** on a regular basis, which can be followed through a live webcast and the speakers’ presentation slides can be accessed via links. The Interim Reports, presentations and webcasts can be found on our Investor Relations website: [http://investor.maersk.com/](http://investor.maersk.com/)

The Board of Directors of A.P. Møller – Maersk A/S continues to consider the “Recommendations for Good Corporate Governance” put forward by NASDAQ OMX Copenhagen. Further annual good corporate governance information is available in the statutory annual corporate governance statement; cf. 107, item b, of the Danish Financial Statements Act covering the financial period 1 January to 31 December.

An independently assured **Sustainability Report** is published and covers all of the Maersk Group’s material sustainability issues. The Sustainability website [http://www.maersk.com/sustainability](http://www.maersk.com/sustainability) provides additional information on the UN Global Compact requirements describing how the Maersk Group fulfills these (Maersk COP), as well as the Maersk Group’s sustainability accounting principles. The majority of the Maersk Group’s businesses also publish annual accounts of their progress within their material sustainability issues.

The report contains forward looking statements on expectations regarding the achievements and performance of A.P. Møller - Maersk A/S and the Maersk Group. Such statements are subject to risks and uncertainties, as various factors, many of which are beyond A.P. Møller - Maersk A/S and the Maersk Group’s control, may cause actual results and development to differ materially from expectations contained herein.