



TEEKAY

# MODERN SLAVERY ACT STATEMENT



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## MODERN SLAVERY ACT STATEMENT

This Modern Slavery Act statement ("Statement") is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 ("**Modern Slavery Act**") on behalf of Teekay Corporation and its subsidiaries ("Teekay") for the financial year end, 31 December 2018, and the period **1 January 2018 to 31 December 2018**. This Statement is also intended to apply to the Australian Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW).

### Our Business Structure and Supply Chain

Teekay is a leading provider of international crude oil and gas marine transportation services. Teekay Corporation provides these services through its directly-owned fleet and its controlling ownership interests in Teekay LNG Partners L.P. (NYSE:TGP), the world's third largest independent owner and operator of LNG carriers, and Teekay Tankers Ltd. (NYSE:TNK), one of the world's largest owners and operators of mid-sized crude tankers. Teekay manages and operates total assets of approximately \$11 billion, comprised of 155 liquefied gas, offshore, and conventional tanker assets. With offices in 12 countries and approximately 5,600 seagoing and shore-based employees, Teekay provides a comprehensive set of marine services to the world's leading oil and gas companies. In order to meet our obligations and commitments to customers and stakeholders, we engage with a reputable and international supply chain, which is focused on providing supplies and services to the shipping, LNG and offshore oil and gas industries.

### Our Culture

Integrity is a core value at Teekay. Teekay's board of directors and its senior leadership team seek to set a strong tone from the top throughout the organization to reinforce the importance of trust and integrity. Teekay supports a shared leadership approach in which integrity is embraced as a shared responsibility by all personnel within the organization. Compliance champions have been appointed in various offices to actively maintain and support Teekay's strong culture of integrity.

### Our Policies on Modern Slavery

Modern slavery, as used in this Statement, refers to any offense set forth in the **Modern Slavery Act** (and any other applicable legislation) including slavery, servitude/ forced/compulsory labour and human trafficking. Teekay takes a zero-tolerance approach towards any modern slavery in its supply chain. Our policies to prevent business ethics violations, including in relation to modern slavery, are summarized below:

- Our **Standards of Business Conduct** ("Standards"), which may be found in the Investors/Governance section of our corporate website ([www.teekay.com](http://www.teekay.com)), is the cornerstone of our business ethics program. These Standards, which are mandatory reading for Teekay

personnel, set out the rules of ethical conduct that all Teekay personnel must follow. The Standards reinforce our zero-tolerance approach towards business ethics violations such as modern slavery and provide rules and guidance related to:

- the prevention of slavery, forced labour, human trafficking, child labour and any other violation of the **Modern Slavery Act** or related legislation;
  - performing risk-based due diligence to check the business ethics of our counterparties including their commitment to prevent modern slavery offences;
  - including business ethics (and modern slavery) undertakings in our contracts;
  - reporting suspected breach of our Standards including in relation to modern slavery;
  - safeguarding the environment and promoting sustainability;
  - preventing corruption, sanctions, trade control and proscribed person violations;
  - keeping accurate financial records and maintaining effective internal controls;
  - preventing fraud, money laundering and any facilitation of tax evasion;
  - protecting privacy and confidentiality; and
  - avoiding conflict of interests and unauthorized political contributions.
- Our **Compliance Guide** (“Guide”), which is made available to all personnel, supplements the Standards of Business Conduct. This Guide provides instruction and detailed guidance to enable Teekay personnel to understand and adhere to the Standards of Business Conduct on a practical level. The Guide contains case studies, including in relation to the **Modern Slavery Act**, to demonstrate how personnel should conduct themselves when faced with business decisions that involve integrity issues.
  - Our **Ship Recycling Policy** governs the processes and standards that Teekay follows when recycling end-of-life vessels. Our policy requirements meet or exceed the requirements of the 2009 Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships. As part of our policy, Teekay checks and approves the integrity and labour practices of the recycling yards and service providers with which it intends to do business. Teekay will only engage recycling yards that demonstrate acceptable environmental and labour practices conforming to the **Modern Slavery Act**. Teekay is a member of the Ship Recycling Transparency Initiative (SRTI), which supports and promotes socially and environmentally responsible ship recycling.

## Our Due Diligence Methodology

Teekay has implemented a due diligence procedure that requires Teekay personnel to check and “onboard” those third parties that might reasonably present a compliance risk to Teekay before transactions are entered with such parties or payments are made to them. As part of this process, Teekay checks the third parties’ track record and commitment to observe the **Modern Slavery Act**. Teekay has an automated third-party onboarding system, which assists Teekay to check and risk-assess new business parties based on defined risk criteria including transaction type, geographic



transparency rankings, adverse media, and sanctions/ watchlist hits. Entities/persons that are provisionally assessed as high or medium risk are subject to further evaluations, which may include due diligence questionnaires, interviews, certifications or external due diligence reports. Teekay personnel must obtain compliance department approval before proceeding with such high/medium risk transactions.

Business ethics clauses, which refer to the **Modern Slavery Act**, must be included in Teekay contracts and subcontracts in accordance with our contract review procedure. Teekay requires its suppliers and service providers to take appropriate steps to prevent modern slavery in their supply chain and to strictly refrain from abusive labour practices in violation of the **Modern Slavery Act**.

## Our Risk Management, Measurement and Monitoring

Teekay observes all applicable laws and regulations including those requirements specified in the Sarbanes Oxley Act of 2002. Teekay implements all required internal controls and conducts regular internal audits to assess and monitor its business ethics compliance.

We recognize that regular risk assessments are an important component of an effective compliance program. We conduct risk assessments on a quarterly basis to identify existing and emerging risks, which may originate internally or externally. Teekay uses these risk inputs to assess and prioritize its mitigation responses. Business ethics, including modern slavery considerations, are routinely considered as part of these risk assessments.

Teekay recognizes that certain geographic areas (e.g. jurisdictions that score poorly in the Global Slavery Index), certain activities (work involving migrant, casual or less skilled labour), and certain transaction types (e.g. shipyards, manning agents), amongst other issues, may present heightened risk potential for modern slavery. Teekay adopts a risk-based approach to coordinate its due diligence, training and monitoring efforts so that resources are allocated proportionately to assessed risks.

Teekay's compliance program is audited by a separate Risk & Audit department to promote candid feedback for improvement. The Risk and Audit team is also responsible for implementing and executing a regular audit plan, which investigates business ethics risks/concerns such as modern slavery. This audit function, which is guided and informed by risk management data, supplements the ongoing monitoring of business ethics risks (including modern slavery), which is the responsibility of all Teekay personnel. Measuring and monitoring is an essential part of our business ethics' compliance efforts. We keep track of, and analyze, our due diligence, training, reporting and other relevant data to monitor the effectiveness of our efforts, to identify areas of improvement and to focus our resources on the most relevant issues.

## Our Training and Communications

Teekay provides multiple business ethics training sessions as follows:



- An annual ‘in-person’ “Doing Business with Integrity” training (with a section covering modern slavery) session for all shore-based personnel;
- An annual internet-based training, with a test component, for all shore-based personnel;
- Video-based induction compliance training (including modern slavery) for new employees;
- Video training and/or in-person business ethics training for seafarers as part of Teekay’s Quality Assurance Training Officer (QATO) presentations;
- Bespoke compliance training for specific departments (e.g. business development, finance/accounting) on an *ad hoc* basis.

Regular communications (including videos on business ethics and modern slavery) are also published on Teekay’s intranet and by email.

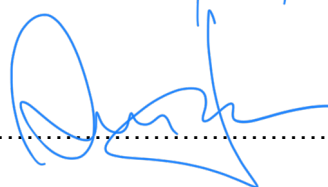
## Reporting Concerns

Teekay personnel are required to report business ethics violations (including any suspected modern slavery offences) to the Chief Compliance Officer, who reports to Teekay’s Audit Committee. Personnel may also, at their option, report any suspected business ethics violation, including human rights violations and abusive labour practices under the **Modern Slavery Act**, through an anonymous and/or confidential hotline, the details of which are provided in Teekay’s Standards of Business Conduct.

## Authority and Approval

This Statement has been approved, as of the date below, by the Audit Committee of Teekay Corporation and it extends to Teekay Corporation’s subsidiaries, which include Teekay Tankers Ltd., Teekay LNG Partners L.P., Tangguh Hiri Finance Limited, Tangguh Hiri Operating Limited, Tangguh Sago Finance Limited, Tangguh Sago Operating Limited, Teekay Hummingbird Production Limited, Teekay Marine Solutions Ltd, Teekay Nakilat (II) Limited, Teekay Petrojarl Floating Production (UK) Ltd., Teekay Shipping (UK) Ltd., Teekay Shipping (Glasgow) Ltd. and Golar-Nor (UK) Limited. A full list Teekay Corporation’s subsidiaries is available in its 2018 20-F, Annual Report, [Exhibit 8.1 \(https://www.sec.gov/Archives/edgar/data/911971/000162828019003715/tkc2018ex-81.htm\)](https://www.sec.gov/Archives/edgar/data/911971/000162828019003715/tkc2018ex-81.htm).

Dated: ..... May 6, 2019

Signed: 

**Alan G. Semple**  
 Director, Chair of Audit Committee  
 Teekay Corporation