

**U.S. GOVERNMENT ANNUAL REPORT FOR RESPONSIBLE INVESTMENT IN  
BURMA**

**CROWLEY MARINE SERVICES, INC.**

**JULY 1, 2013**

**Reporting Requirement:**

**1. Name: Name of submitter.**

Crowley Marine Services, Inc. (“Crowley Marine Services”).

**2. Acknowledgement: The submitter shall include a signed acknowledgement that the submitter understands that the Public Report will be made public, and that the submitter has redacted before submission any information it considers in good faith to be exempt from public disclosure under FOIA Exemption 4.**

By signing this report, Crowley Marine Services acknowledges that the Public Report will be made public, and that Crowley Marine Services has redacted before submission any information it considers in good faith to be exempt from public disclosure under FOIA Exemption 4.

**3. Point of Contact: Provide contact information for public inquiries regarding this report.**

Mark Miller  
Director, Corporate Communications  
9487 Regency Square Blvd.  
Jacksonville, FL 32225  
Mark.Miller@Crowley.com  
(904) 727-4295

**4. Overview of Operations in Burma:**

**a. Name(s) of companies, including all subsidiaries, operating in Burma covered by this report.**

Crowley Marine Services.

**b. Nature of business in Burma;**

On September 22, 2012, Crowley Marine Services demise (bareboat) chartered an unmanned ocean going deck-cargo barge, 455-8, to Posh Semco PTE. LTD., 07-02 Great World City, Singapore 237994, for use by Posh Semco’s customer, Larsen & Toubro, in an offshore oil and gas exploration construction project in

U.S. GOVERNMENT ANNUAL REPORT FOR RESPONSIBLE INVESTMENT IN BURMA  
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JULY 1, 2013

Burmese waters involving PTTEP International Limited (“PTTEPI”). At the time, Myanmar Oil and Gas Enterprise (“MOGE”) was a 20% partner in PTTEPI. Through the demise charter of the barge, complete operational control of the dumb barge was transferred to Posh Semco in Singapore for the entire charter period. The barge was subsequently towed to the offshore worksite in Burmese waters and left Burmese waters on or about February 3, 2013, with the charter agreement terminating several weeks later in Singapore.

**c. Location(s) of operations in Burma; and**

N/A

**d. Approximate maximum number of employees in Burma during the reporting period (broken down by Burmese and non-Burmese employees).**

N/A

**5. Human Rights, Worker Rights, Anti-Corruption, and Environmental Policies and Procedures: Provide a concise summary or copies of the following policies and procedures as they relate to the submitter’s operations and supply chain in Burma.**

**a. Due diligence policies and procedures (including those related to risk and impact assessments) that address operational impacts on human rights, worker rights, and/or the environment in Burma;**

Crowley Marine Services maintains a comprehensive series of policies and procedures that address environmental and safety issues, as well as human and worker rights. These policies apply regardless of where in the world Crowley Marine Services is operating.

**b. Policies and procedures that address anti-corruption in Burma;**

Crowley Marine Services maintains a comprehensive anti-corruption policy that governs its international operations. The policy requires Crowley Marine Services, its employees, and its business partners to comply with the requirements of the Foreign Corrupt Practices Act, the U.K. Bribery Act, and similar laws in all countries in which Crowley Marine Services operates.

**c. Policies and procedures that address community and stakeholder engagement in Burma (if the submitter has undertaken any stakeholder engagement to date, also summarize);**

N/A

U.S. GOVERNMENT ANNUAL REPORT FOR RESPONSIBLE INVESTMENT IN BURMA  
CROWLEY MARINE SERVICES, INC.  
JULY 1, 2013

- d. Policies and procedures that address hearing grievances from employees and local communities, including whether grievance processes provide access to remedies, and how employees and local communities in Burma are made aware of said processes;**

N/A

- e. Global corporate social responsibility policies, including those that address human rights, sustainability, worker rights, anti-corruption, and/or the environment; and**

See descriptions in 5.a. and 5.b. above.

- f. Whether and the extent to which the policies and procedures described in Question 5.a through 5.d are applied to, required of, or otherwise communicated to related entities in Burma, including but not limited to subsidiaries, subcontractors, and other business partners.**

N/A – Crowley Marine Services' counterparty, Posh Semco PTE. LTD., was located in Singapore. Additionally, through the demise charter of the barge, complete operational control of the unmanned 455-8 was transferred from Crowley Marine Services to Posh Semco.

**6. Arrangements with Security Service Providers: Provide the below information regarding any arrangements the submitter has with security service providers.**

- a. Name(s) of security service provider(s);**

N/A

- b. Duties and responsibilities of security service provider(s); and**

N/A

- c. Whether security service providers are signatories to the International Code of Conduct for Private Security Service Providers and/or whether they have been certified to any private security provider national or international standards; and**

N/A

U.S. GOVERNMENT ANNUAL REPORT FOR RESPONSIBLE INVESTMENT IN BURMA  
CROWLEY MARINE SERVICES, INC.  
JULY 1, 2013

- d. A concise summary of due diligence policies or practices for engaging and utilizing security services providers including those focused on human rights and anti-corruption, e.g. oversight policies and procedures and whether security service providers are subject to third-party auditing.**

N/A

- 7. Property Acquisition: For any purchase, use, or lease of land or other real property, or rights related thereto, by the submitter (including the submitter's subsidiaries) either (a) valued over \$500,000 or (b) larger than 30 acres of land or other real property, provide the information described below. For the purposes of this section, purchase, use, or lease of adjacent or otherwise related land or other real property shall be treated as a single transaction and must be reported where the cumulative value of the related transactions exceeds \$500,000 or is over 30 acres.**

- a. A concise summary of any policies procedures used to ascertain land or other real property ownership, use rights, dislocation, resettlement, or other claims and an explanation of how those policies were implemented for each land purchase, use, or lease transaction;**

N/A

- b. The city/state or province where the land or other real property was purchased, used, or leased (e.g., "Myitkyina, Kachin State");**

N/A

- c. A concise summary of any policies or procedures, including grievance mechanisms, related to the dislocation or resettlement of people with respect to land or other real property and an explanation of how those policies were implemented for each land purchase, use, or lease transaction.**

N/A

- d. Any financial/material arrangements made to compensate previous users/residents of such land or other real property (other than to the lessor/owner), of which the submitter is aware; and**

N/A

- e. Any information of which the submitter is aware related to any involuntary resettlement or dislocation of people on land that meets the criteria as specified in question 7.**

N/A

U.S. GOVERNMENT ANNUAL REPORT FOR RESPONSIBLE INVESTMENT IN BURMA  
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**8. Transparency: Report total payments made by submitter or on its behalf valued over \$10,000 during the reporting year to each Government of Burma entity and/or any sub-national or administrative governmental entity or non-state group that possesses or claims to possess governmental authority over the submitter's new investment activities in Burma. Payments to each entity should be reported by each separate payment type, including but not limited to, royalties, tax obligations, production-sharing arrangements, and fees.<sup>10</sup> If the submitter's aggregate payments to a particular entity during the reporting year are valued at less than \$10,000, there is no need to report on payments to that entity. If no aggregate payments are valued over \$10,000, indicate by "none," "not applicable," or another appropriate response. This reporting requirement is in addition to any other legally required reporting on payments made to government entities.**

None.

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Arthur F. Mead III  
*Vice President, General Counsel, Assistant Corporate Secretary*  
Crowley Maritime Corporation