

STATEMENT OF B.G. FREIGHT LINE HOLDING B.V. AS PARENT COMPANY FOR THE B.G. FREIGHT LINE GROUP OF COMPANIES (“B.G. FREIGHT LINE”) PURSUANT TO THE UK MODERN SLAVERY ACT 2015 (“THE ACT”)

At B.G. Freight Line we are committed to doing the right thing in the right way. Our policies and procedures aim to ensure that the highest standards of ethics and integrity are maintained. As the shipping line division of the Peel Ports Group of companies (“Peel Ports Group”), we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we are fully committed to combatting slavery and human trafficking.

ORGANISATION STRUCTURE & BUSINESS

B.G. Freight Line is the shipping line division of Peel Ports Group. We are based in the Netherlands and provide short sea container services between the UK, Ireland and mainland Europe and feeder services between the UK and Ireland.

OUR SUPPLY CHAIN

Our supply chain principally covers the time charter of vessels (which includes the provision of crew), haulage, supply of fuel and waste disposal services. In addition, we lease containers and utilise third party hauliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking and expect those in our supply chain and contractors to comply with our values and ethics. To that end we are in the process of putting in place a supply chain compliance programme to consist of certifications, contractual provisions requiring compliance and sanctions for supplier non-compliance.

DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk we are seeking to implement the following steps:

Supply Chain

Supplier Selection, Certifications and Contracts

- We endeavour to only use reputable shipbrokers and ship owners when chartering vessels;
- We are in the process of putting in place procedures to ensure that all future suppliers of goods or services to B.G. Freight Line are required to respond to a pass/fail question on whether their organisation is compliant with the Act;
- We are currently looking at revising our agreements which are used for the purchase and supply of goods and services to include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and requiring that adequate and compliant policies and procedures are maintained and enforced related to such matters and prohibiting any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. They will also provide for us to be able to audit compliance in respect of such matters and terminate and cease dealing with any supplier in the event of a breach of any such obligations;
- We are proposing on carrying out an assessment of existing supplier relationships with a view to approaching those key suppliers who we will select based on priority according to perceived risk (taking into account relevant factors such as supplier location and the nature of the supplies, such as the supply of labour) with a view to seeking to impose additional obligations or agreeing contract variations to address the requirements of the Act.

Violations

In accordance with our zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking, we will seek to ensure that all future agreements, which are used for the purchase and supply of goods and services will allow us to terminate and cease dealing with any supplier in the event of any such violation.

Our own business

Written policies and procedures

Code of Conduct

The Peel Ports Group Code of Conduct applies to B.G. Freight Line and details the standards that all our employees are expected to adhere to in terms of behaviour. The Code sets out our undertaking with regard to human rights and compliance with labour law. It specifically sets out our commitment to not use compulsory or forced labour in our operations and to maintain a framework of fair and just remuneration and working hours.

Whistleblowing policy

B.G. Freight Line encourages all its workers, customers and business partners to report any concerns related to its direct activities or its supply chain. This includes any circumstances that give rise to an enhanced risk of slavery or human trafficking. Peel Ports Group's Whistleblowing policy is applicable to employees of B.G. Freight Line and is designed to make it easy for employees or officers to make disclosures without fear of retaliation.

Recruitment /Agency Workers Policy

B.G. Freight Line is reviewing its recruitment procedures (both direct and through employment agencies) to ensure that we have in place rigorous identity checks prior to employing individuals and ensure that all employees are in receipt of the minimum wage.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we are in the process of introducing workshop training for relevant managers within our business.

Violations

Our Disciplinary policy permits the termination of employment of employees found to be involved in any breach of the law including the law banning forced labour, slavery and human trafficking.

OUR EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING

We will keep under review, monitor and assess how effective we are to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain and we will take and implement all appropriate steps and measures to act on the findings and outcomes of any such reviews and assessments and maximise our effectiveness and continual improvement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes B.G. Freight Line's slavery and human trafficking statement for the financial year ended 31 March 2017. The statement has been approved by our Board of Directors.

Koert Luitwieler
Director
B.G. Freight Line Holding B.V.

30 September 2017

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke, positioned below the printed name and date.