

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 do everything in our power to eradicate these.

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 and feeder container services between the UK, Ireland and mainland Europe and in the Irish Sea.

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 for acting ethically and with integrity in all our business relationships. We strive to implement 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.

DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk we continue to apply the following measures:

Supply Chain

Supplier Selection, Certifications and Contracts

- We seek to ensure that we select only subcontractors with an excellent reputation and proven track record.

- We are renewing our agreements where possible 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 those relating 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. The agreements also provide for us to terminate and cease dealing with any supplier in the event of a breach of any such obligations.

Our own business

Written policies and procedures

Code of Conduct

The Peel Ports Group Code of Conduct applies to B.G. Freight Line.

The Code of Conduct details the standards that all Peel Ports' employees are expected to adhere to in terms of behaviour. The Code sets out Peel Port's undertaking with regard to human rights and compliance with labour law. It contains a specific section on Modern Slavery, which details Peel Ports' responsibilities and Supply Chain Compliance Programme. It states Peel Ports' commitment to not use compulsory or forced labour in its operations and to maintain a framework of fair and just remuneration and working hours.

Whistleblowing Policy

Peel Ports Group's Whistleblowing policy applies 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.

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.

Recruitment /Agency Workers Policy

B.G. Freight Line has recently reviewed its recruitment procedures (both direct and through employment agencies) to ensure that it has in place correct identity checks prior to employing individuals and have ensured that all our employees are in receipt of at least the applicable 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 provide workshop training for relevant managers within our business.

A new training programme is being rolled out for all Peel Ports Group employees in 2024 and this will include a module on modern slavery.

Awareness Campaign

In August 2023 Peel Ports Group published a modern slavery poster to highlight modern slavery and provide contact details to raise any modern slavery concerns. These posters are displayed at B.G. Freight Line's premises.

Audit

In September 2023 Peel Ports Group instructed a third party to undertake a modern slavery audit of the activities of BG Freight Line, the results of which are expected to be delivered in 2024.

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 2023. This statement has been approved by our Board of Directors.

Koert Luitwieler

CEO

B.G. Freight Line Holding B.V.

September 2023