



BG Freight Line

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Modern Slavery Statement

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Introduction

This is the FY24 Modern Slavery Statement of BG Freight Line Holding B.V. as parent company for the BG Freight Line Group of Companies ("BG Freight Line), pursuant to the Modern Slavery Act 2015 ("the Act").

At BG 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. We are part of the wider Peel Ports Group, sharing values, policies, and practices, including those related to Modern Slavery.

BG 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.

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.

Having a robust, ethically sourced and diverse supply chain is a non-negotiable priority. Our goal as part of Peel Ports Group is to create a transparent and accountable environment, ensuring that BG Freight Line and its stakeholders uphold high ethical standards and actively work to prevent modern slavery and human trafficking.

Policies

BG Freight Line's Modern Slavery Statement is supported by the following policies:

- Anti-Slavery And Human Trafficking Policy
- Anti Bribery And Corruption Policy
- Whistleblowing Policy
- ESG Policy
- Supplier Code Of Conduct 2023

All of these policies are publicly available here: <https://www.peelports.com/group-policies>

In addition, the Peel Ports Group 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.

2024 Risk Assessment

In 2024 Peel Ports Group engaged Align Ltd (“Align”) to conduct a modern slavery risk assessment of BG Freight Line. This included several interviews with key members of staff at BG Freight Line and a review of our current approach, policies and efforts to protect individuals and our supply chain against the risk of modern slavery. In addition, Align facilitated a lived experience site assessment of one of our vessels that had travelled from the Netherlands to England. Crews were engaged on the vessel, the officers and the captain were interviewed, documents were reviewed and a physical assessment of the vessel was conducted.

Training On Modern Slavery

All new employees are advised of their responsibilities in relation to modern slavery as part of their HR induction.

In September 2023 a number of employees attended a modern slavery training session with the Supply Chain Sustainability School.

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. Certain employees will also take part in a “Modern Slavery Masterclass” training session delivered by lived experience experts to raise awareness and education and drive ongoing engagement.

Modern Slavery Posters

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

In 2024 we are updating these posters to include more striking images and reference to CoMensha - a Dutch modern slavery NGO that provides specific advice in the Netherlands. We are also making a version available to our customers and suppliers for display at their places of work.

2025 Focus Areas

Through the 2024 Risk Assessment we identified the following three focus areas for 2025:

- 1. A Commitment to Improvement**
- 2. Improve Supply Chain Management Practices**
- 3. Reporting Mechanisms**

A Commitment to Improvement

We will build on our modern slavery statement year on year by identifying tangible actions and tracking and monitoring their effectiveness. We will report back on our progress via our modern slavery statement.

Improve Supply Chain Management Practices

As a result of the 2024 Risk Assessment we will update our charterparty terms to require modern slavery due diligence and this will be audited annually.

We will continue our work with vessel owners by engaging them in discussions about modern slavery.

Reporting Mechanisms

We will set clear KPIs to measure our progress.

The metrics under consideration include:

- % of charterparties that contain modern slavery clauses.
- Number of staff and levels that have completed new modern slavery training.
- % increase in understanding of modern slavery.
- % increase in the business processes relating to modern slavery.
- % increase in understanding of how risk could impact the business.
- % increase in confidence in spotting a sign of modern slavery.
- % increase in confidence in acting when you have a concern about modern slavery.

Actions Carried Out And 2025 Proposed Actions

What we said we would do in 2023	What we did in 2024	What we will do in 2025
Introduce training	We delivered introduced a new training programme will carry out a “Modern Slavery Masterclass” with a lived experience consultant.	Continue to improve our modern slavery statement.
Introduce an awareness campaign	We introduced a poster campaign.	Improve supply chain management practices, including updating our charterparty terms to require

		modern slavery due diligence which will be audited annually.
Carry out a risk assessment	We engaged Align to carry out a risk assessment in respect of the vessels that we charter.	Put reporting mechanisms in place.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BG Freight Line Limited's slavery and human trafficking statement for the financial year ended 31 March 2024. This statement has been approved by our Board of Directors.



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

September 2024