

MODERN SLAVERY ACT 2023  
**DAMPSKIBSSELSKABET NORDEN A/S**

## **Statement on Slavery and Human Trafficking**

Conducting business in a legal, ethical, and socially responsible manner is core to NORDEN and in line with our values. We are committed to ensuring that modern slavery or human trafficking does not occur in any part of our business or supply chain. NORDEN's framework for respecting human and labour rights is operationalised by the UN Guiding Principles on Business and Human Rights (UNGPs), which draws on the International Bill of Human Rights, the International Labour Organisation's Declaration of Fundamental Principle and Rights at Work, and the Rio Declaration on Environment and Development. Additionally, NORDEN is a member of the IMPA ACT, a programme for responsible supply chain management also based on the UNGPs.

NORDEN recognises that modern slavery can occur in several forms such as forced or bonded labour, workplace abuse, child labour, servitude, work, and sex trafficking. The term *Modern slavery* is used to cover these various forms of slavery and human trafficking.

## **Organisational structure and supply chain**

NORDEN is a shipping company operating within international trades. All employees of all offices are covered by this statement.

NORDEN's supply chain includes sales and acquisition of vessels, chartering, vessel management and transportation of cargo. The company disposes of owned vessels, long-term chartered vessels and short-term chartered vessels and trip charters. NORDEN's Supplier Code of Conduct describes expected business conduct by suppliers to NORDEN and the Code of Conduct for Technical Managers. These codes set out expectations concerning responsible business behaviour in the areas of human and labour rights, environment, and anti-corruption. We expect suppliers and require that technical managers establish a process of continuous due diligence in relation to their actual and potential adverse impacts on these areas.

## **High-risk areas in relation to slavery and human trafficking**

Potential risks related to slavery and human trafficking may arise in relation to NORDEN's direct activities, supply chain, through third parties and other business relationships. With the complex and extensive supply chains of international trade, NORDEN recognises that there is a potentially increased risk of involvement in modern slavery.

## **Addressing risks**

NORDEN's process for anti-slavery measures is integrated into the company's broader human rights due diligence processes and is based on the UNGPs. NORDEN conducted its first Human Rights Impact Assessment (HRIA) in 2015 with a specific focus on our offices and employees on shore, our vessels, and employees at sea. NORDEN's latest Annual Report details the HRIA procedure as well as the main conclusions.

NORDEN is committed to providing our employees and other stakeholders with access to raise concerns. Employees can raise concerns directly with their manager, alternatively, employees can use NORDEN's whistleblower scheme. Our whistleblower scheme is readily available on our website for external stakeholders to use.

**Governance**

NORDEN's key policies in relation to slavery and human trafficking include:

- Human Rights Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Code of Conduct for Technical Managers
- Whistleblowing scheme

NORDEN works to embed respect for human rights into everyday practice and decision-.

The NORDEN Sustainability lead is trained in human rights for safeguarding process, policy, and compliance with UNGP requirements and with the provisions of the Act.

**Approval**

*This policy is subject to review every two years to ensure effectiveness and compliance with NORDEN's strategy and in the case of significant changes, the policy will be presented to Head of People for approval. Latest review: November 2023.*