

# 2025 UK Modern Slavery Statement

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# Policies in relation to slavery and human trafficking

DFDS is dedicated to eradicating modern slavery and human trafficking from our supply chain and all aspects of our operation. We prioritise transparency and awareness in these efforts. Through our Human Rights policy and procedures, we not only ensure compliance with national laws but also uphold international conventions safeguarding employee rights, including those employed through third parties. Our Code of Conduct, available to all employees, establishes ethical and responsible behaviour expectations within the DFDS Group. In addition, our Labour Code of Conduct, updated in 2025, outlines the conditions that employees within DFDS can expect from their employment. This code explicitly rejects all forms of forced and bonded labour throughout our value chain. From 2025 onwards, Code of Conduct training is mandatory as part of our onboarding programme, and we have placed a continued focus on this including regular in person briefings for our non-office employees and the utilisation of our online learning platform to track learning for all our managers and office-based employees.

As members of IMPA ACT, a responsible supply chain management programme, and the UN Global Compact, which guides businesses in upholding human rights, we have a strong foundation for the DFDS business approach. Our procurement requirements are based on the general principles outlined in the UN Global Compact, supported by the UN Guiding Principles on Business and Human Rights. We reference the International Bill of Human Rights (IBHR), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILOD), the Rio Declaration on Environment and Development, the United Nations Convention against Corruption, and other pertinent international principles.

We maintain robust systems and controls to ensure transparency and prevent slavery and human trafficking within our organisation. We expect our suppliers to do the same, incorporating relevant assessments. Training programmes are conducted to foster understanding and compliance across the UK and the wider DFDS Group.

## Due diligence processes

DFDS adopts proactive measures to ensure openness and transparency in our operations, aligning with our obligations under the UK Modern Slavery Act. We comply with all legislative requirements related to right-to-work checks, conducting due diligence on aspects such as shared bank accounts and home addresses to identify any concerns. We have reviewed our contracts with temporary agency staff suppliers to ensure compliance with modern slavery legislation. Suppliers are expected to

conduct regular audits, mitigating potential risks in this higher-risk area. Furthermore, we engage in supplier assessments with EcoVadis to evaluate risks pertaining to ESG (Environmental, Social, and Governance) and human rights approaches. We have also launched EcoOnline, a reporting tool for the usage of all employees which facilitates the reporting of safety hazards and general workforce safety concerns.

## Risk assessment and management

As part of our reporting under the Corporate Sustainability Reporting Directive (CSRD), we conduct an annual double materiality assessment, adhering to the requirements of the reporting standards. This assessment includes the identification and evaluation of key risks associated with human rights. Our analysis encompasses the significant risks related to people and workers in the value chain, such as the potential impact on migrant workers through cross-border supplier logistics and worker rights in general. We review this analysis annually to ensure the identification of key risks and the implementation of necessary actions.

Due to the nature of road transport activities, workers in the value chain of this industry face heightened human and labour rights risks. To address this, we have established an audit function - Group Haulage Compliance - which is responsible for conducting audits of external hauliers within our Logistics operations via external auditor partners. In 2025 we unfortunately had to replace one of our auditing partners, which resulted in less auditing capacity compared to previous years. Consequently only 70 audits were conducted in 2025, focusing on our largest suppliers. A new external auditor partner has been onboarded for 2026 to improve audit capacity. The audits completed in 2025 have resulted in identification of non-conformities with relevant follow-up actions and a few actions leading to blacklisting suppliers. In 2026 we will continue the audit programme and plan to perform 150 audits selected based on risk exposure for DFDS, thereby continuing with our significant focus on ensuring supplier compliance.

To support this, we will continue our work of establishing our human rights review group. The group will be tasked with collecting input from across the DFDS organisation helping ensure that human rights are being prioritised throughout the business. The review group will review and assess any need for updates of DFDS' Human Rights Policy and internal due diligence processes and provide recommendations to the Head of Group Sustainability for possible implementation.

## Key Performance Indicators (KPIs)

DFDS operates a confidential grievance mechanism (whistleblower system) available to all employees and third parties for reporting concerns. We take all concerns seriously and encourage employees, business partners, communities, and stakeholders to report any suspicions of unethical activities, either directly or anonymously, without fear of retaliation.

Additional work has been done on promoting the DFDS confidential whistleblowing reporting system across all our UK locations, further driven by our legal obligations relating to preventing sexual harassment in the workplace. As part of this we also introduced a local confidential line for concerns not identified as formal whistleblowing matters. We formally track and review all cases raised and corrective or proactive action necessary is taken both at a local and regional level.

DFDS will continue to focus on protecting workers by maintaining accessible grievance and whistleblowing mechanisms and promoting a culture where concerns can be raised without fear of retaliation. Where actual or potential adverse impacts are identified, DFDS aims to ensure remediation is effective and worker centred, working with suppliers to address issues and prevent recurrence. DFDS expects suppliers to engage in remediation and improvement efforts, and termination of supplier relationships will be considered only as a last resort where serious non-compliance persists and risks to workers cannot be adequately addressed.

To measure the effectiveness of our actions, we have established KPIs. These include tracking cases related to modern slavery issues in the whistleblower system and annual targets for audits conducted. In 2025, we identified zero confirmed cases of forced labour or human trafficking - we reviewed every concern raised through the whistleblower system; none related to modern slavery.

## Training on modern slavery and trafficking

We recognise that the risk of modern slavery is not static, and we have further expanded our operations into non-OECD markets, namely, Tunisia, Egypt and Morocco. There are no DFDS employees in Tunisia and Egypt however, in Morocco, we mitigate risks in the same way as elsewhere in our operations by ensuring our DFDS codes of conduct are adhered to and the same level of diligence, training and access to our whistleblowing scheme is as elsewhere in DFDS. In addition, we employ all land based workers directly under DFDS contracts, ensuring employment conditions meet DFDS standards and accountability is maintained. In our maritime operations, DFDS applies fixed work schedules aligned with the legal 48 hour work

week to prevent excessive working hours, withheld wages, and other forced labour risks.

We continue to strive to ensure that DFDS standards of compliance are upheld in all regions within which we operate and that employees involved in recruitment, procurement and management possess a high level of understanding regarding our Code of Conduct and the related risks. We have strict recruitment controls in place, and we promote a general awareness across our business to enable the identification of any concerns that may arise. To provide additional mechanisms for feedback directly from our colleagues, one of which is our employee engagement survey which includes specific questions relating to working conditions, freedom of opinions, diversity, inclusion, mental, physical, financial and social health, bullying and harassment, discrimination, and the view of the organisation's responsiveness to tackling concerns and issues - this has enabled us to continually identify areas for further proactive positive action. We have also introduced a UK diversity, equity and inclusion framework enabling each area of the business to have their own individualised local engagement and wellbeing action plans which are actively championed, reviewed and followed up.

We have continued our focus on well-being activity including an ongoing series of workforce well-being communications featuring guidance on how to identify the signs of slavery or human trafficking, the steps to take if it is suspected, and what external specialist support is available..

## Additional forward looking actions

DFDS will continue to develop its overall approach to responsible supply chain management through ongoing supplier engagement and capacity building activities. This includes the use of supplier self-assessment questionnaires to support risk identification and dialogue, and the use of corrective action plans, with appropriate timelines, where improvement opportunities are identified.

As part of its ongoing efforts to address the risks of modern slavery, DFDS expects to further strengthen safeguards for migrant workers through awareness raising and communication activities, and to continue refining its risk assessment and mapping processes to improve visibility of potential higher risk areas. DFDS will also seek to progressively expand the use of social audits within higher risk parts of the supply chain, taking a proportionate and risk based approach and reviewing progress as part of its broader due diligence activities.

This statement has been approved by the Board of Directors of DFDS A/S on May 5th, 2026.