

# Modern Slavery Act

UK - 2023







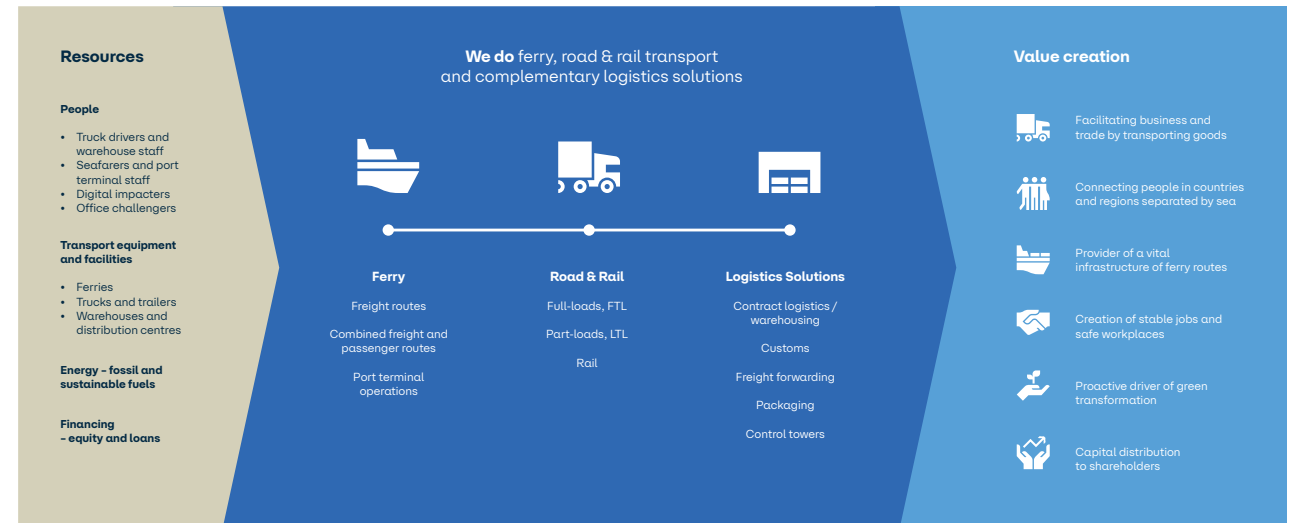
### Introduction

At DFDS, we hold the belief that respecting human rights is integral to our purpose, vision, and values. We prioritise the well-being and human rights of all individuals connected to our operations, including our employees, contractors and service providers, supply chain workers, customers, and the communities in which we operate. We firmly advocate for the freedom, safety, and dignity of every person. The term “modern slavery” encompasses various forms of exploitation wherein individuals are unable to refuse or escape due to threats, violence, coercion, abuse of power, or deception. This includes slavery, servitude, forced labour, human trafficking, debt bondage, and all child labour. Such exploitative practices have long-lasting impacts on the individuals affected and the communities they belong to, spanning across the globe.

### Organizational structure and value chain:

DFDS A/S is the largest integrated shipping and logistics company in northern Europe. With around 14,000 employees located in offices and ships across 25+ countries, we provide freight and logistics services in Europe, Turkey, and Morocco, which involve transport of trailers and containers on both sea, road, and rail. Our organisational structure comprises two divisions and corporate service functions. The ferry division operates our route network, divided into five business areas: North Sea, Baltic Sea & Channel, Mediterranean, Strait of Gibraltar, and Passenger. The logistics division handles our logistics activities across both dry goods and cold chain and are divided into three business areas: UK & Ireland, Continent, and Nordics. DFDS recognises that our value chain plays a crucial role in our sustainability efforts. We are committed to promoting responsible practices across our entire value chain to address modern slavery and human trafficking.

### Business model



**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 organisation. We prioritise transparency and awareness in these efforts. Through our HR policies 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 internal Code of Conduct, available to all employees, establishes ethical and responsible behaviour expectations within the DFDS Group. In addition, DFDS Labour Code of Conduct 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.

We have actively joined the IMPA ACT, a responsible supply chain management program, and the UN Global Compact, which guides businesses in upholding human rights. 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 programs are conducted to foster understanding and compliance across the Group.

**Due diligence processes:**

DFDS adopts proactive measures to ensure openness

and transparency in our operations, aligning with our obligations under the 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.

**Risk assessment and management:**

As part of our preparations for the Corporate Sustainability Reporting Directive (CSRD), we have conducted a double materiality assessment, adhering to the requirements. This assessment includes the identification and evaluation of key risks associated with human rights. Our analysis highlights 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 China concerning the construction of new vessels. We periodically review this analysis to ensure the identification of key risks and the implementation of necessary actions.

Workers within our value chain inherently present risks concerning human and workers' rights. To address this, we have established an internal audit function, Group Haulage Compliance, responsible for conducting audits within our Logistics operations. The audits will be conducted internally and with support of an external partner. The external auditing partners have been onboarded in 2023 and our target for 2024 is to conduct a total of 300 audits.





To support this work we have established a human rights review group whose role will be to collect input from across the DFDS organisation to facilitate that human rights are being prioritised throughout the DFDS business. The review group will review and consider any need for updates of DFDS' Human Rights Policy and internal due diligence processes and provide recommendations to the Sustainability Director for possible implementation.

**Key Performance Indicators (KPIs):**

DFDS operates a confidential grievance mechanism 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.

To measure the effectiveness of our actions, we have established KPIs. These include tracking cases related to modern slavery issues in the WB line and annual targets for audits conducted.

**Training on modern slavery and trafficking:**

We recognise that the risk of modern slavery is not static. We therefore strive to ensure 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, our employee engagement survey was updated to include 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 identify areas for further proactive positive action.

In 2024, we also will launch a Speak-Up promotional campaign for all our colleagues which will more explicitly highlight how to report anything which isn't right and make it easy for everyone to access our Codes of Conduct and our employee handbook. Further awareness activity will include a series of workforce 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.

This statement has been approved by the Board of Directors of DFDS A/S on May 7th 2024.

Torben Carlsen  
Chief Executive Officer

