

Modern Slavery Policy

Borchard Lines Ltd is committed to the highest standards of ethics and integrity in all its business dealings and relationships. A zero tolerance approach is taken to help combat modern slavery and human trafficking. Borchard Lines Ltd continues to support the welfare of crews on board vessels, working together with vessel managers, agents and port authorities to prioritise crew safety and wellbeing.

1. Our Business and Organisation's Structure

With head office in London, Borchard Lines Ltd has a network of dedicated agents at each port of call, a number of its own overseas offices and provides liner container shipping services between ports located in North Europe, North Africa and the Mediterranean and specializes in door to door transport.

2. Our Supply Chains

Our supply chains include, but is not limited to, the procurement of: terminal services, ships, containers, bunkers and ship supplies, crew, warehousing, inland transportation, IT services and office supplies.

3. Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective safeguards to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

4. Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we:

- Identify and assess potential risk areas in our supply chains. A risk assessment has been performed with actions identified to further minimize risks.
- We mitigate the risk of slavery and human trafficking occurring in our supply chains for example: by ensuring that vessels on charter hold a valid MLC ('Maritime Labour Convention') certificate, crewing activity is undertaken by reputable crew management companies in particular those that are members of the International Maritime Employers Council based in London ('IMEC') or adhere to similar standards, and that other suppliers uphold the same values and ethics.
- Our Code of Business Conduct for Suppliers and policies on Modern Slavery and anti-bribery and corruption are communicated to suppliers and sub-contractors engaged to perform on behalf of Borchard Lines Ltd or its customers.
- Supplier visits allow the face to face consultations of subcontracted workers and to witness working conditions first hand with any adverse situations being reported to management for follow up and potential remedial action.
- Hauliers appointed in UK, Italy and Turkey were surveyed and all confirmed that drivers are not subjected to unfair working conditions including lack of rest periods, excessive time away from home, no sick pay or holiday pay or lower than average wages for the role in the country of operation.
- We have a positive commitment and open approach to whistleblowing.
- This process is subject to continuous review and improvement to maximise effectiveness.

5. Supplier Adherence to Our Values and Ethics

We have zero tolerance to slavery and human trafficking. To date, those suppliers identified as most at risk have been requested to confirm adherence to our values and ethics with universal compliance. Where suppliers' non-compliance is identified notice will be given for immediate rectification and otherwise appropriate sanctions may be imposed including termination of contracts. No reports of non-compliance, violations or grievance related to human and labour rights have been received in the reporting year.

6. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we continually assess the need to provide training to our staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes slavery and human trafficking statement for the financial year ending 31st December 2024 and was approved by the board of Directors 19/05/2025.