

Modern Slavery Policy – v1.2

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.

Borchard Lines Ltd recognises modern slavery as a serious global human rights violation and is committed to continually strengthening governance, transparency and accountability across its operations and supply chains.

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 specialises in door-to-door transport. Oversight of modern slavery compliance is the responsibility of the management, with regular reporting to the Board of Directors

2. Our Supply Chains

Our supply chains include, but are 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. Our approach reflects recognised international and national guidance, including the UN Guiding Principles on Business and Human Rights and the UK Government's statutory guidance on transparency in supply chains.

Borchard Lines Ltd is committed to incorporating its Supplier Code of Conduct and modern slavery clauses into all new and renewed contracts. These obligations are to apply equally to subcontractors engaged by suppliers.

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 minimise 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 Maritime Labour Convention (MLC) certificate, crewing activity is undertaken by reputable crew management companies in particular those that are members of the International Maritime Employers Council (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 provide visibility of working conditions, with any adverse situations being reported to management for follow-up and potential remedial action.
- We have a positive commitment and open approach to whistleblowing.
- This process is subject to continuous review and improvement to maximise effectiveness.
- Our risk-assessment methodology considers geographic risk, industry risk, labour-intensity and the use of subcontracted or temporary labour. Suppliers are categorised as low, medium or high risk.
- For higher-risk suppliers, we reserve the right to request additional documentation, conduct audits (announced or unannounced), or engage third-party verifiers.
- Where concerns arise, a structured remediation process may be initiated, including investigation, corrective-action planning, and where required, cooperation with relevant authorities to protect affected workers.

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.

Training is provided on a role-specific basis for employees whose responsibilities may involve interaction with suppliers or operational risk areas. Training may include recognising indicators of forced labour, understanding appropriate responses to concerns and reporting obligations, and developing general awareness of modern-slavery risks along with clear knowledge of internal reporting channels.

7. Key Performance Indicators

Borchard Lines Ltd may use a limited set of internal indicators to help monitor the effectiveness of its approach to modern slavery. These may include basic measures such as supplier confirmations received or relevant staff awareness activities. These indicators are reviewed periodically and adjusted as appropriate.

8. Future Commitments

Borchard Lines Ltd will continue to review its processes and policies to ensure they remain appropriate and proportionate. Future updates may include refinements to supplier engagement, internal oversight or documentation practices as required.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for the financial year ending 31 December 2025. It was approved by the Board of Directors on 26/05/2026.

Reviewed and updated for Version 1.2..