Modern Slavery Act Transparency Statement

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The UK Modern Slavery Act 2015 requires large entities carrying on a business in the UK to publish a statement detailing their efforts (if any) to combat human trafficking and modern-day slavery. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

As part of the shipping industry, "K" Line Group recognizes that it has a responsibility to take a robust approach to slavery and human trafficking.

"K" Line Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organizational structure and activities

The "K" Line Group is a global shipping entity headquartered in Tokyo, Japan but with a network of offices around the globe including the United Kingdom. The UK Group comprises "K" Holding (Europe) Ltd, "K" Line (Europe) Ltd, "K" Line Bulk Shipping (UK) Ltd, and "K" Line LNG Shipping Ltd .
"K" Line Group's UK business units' activities include Car carrier, Dry Bulk and LNG shipping, management and operations.

Training and relevant policies

Charter of Conduct

"K" Line Group companies adhere to a Charter of Conduct which emphasizes due respect to Human rights and compliance with applicable laws, ordinances and rules. "K" Line abides by all labour laws and regulations and does not tolerate child labour or forced labour. Our Charter of Conduct is presented to new staff as part of their training. In addition a more detailed implementation document is used.

The full Charter of Conduct and Implementation can be viewed here:

https://www.kline.co.jp/en/csr/group/charter.html

https://www.kline.co.jp/en/csr/group/charter/main/01/teaserItems1/0/linkList/0/link/guideline_12.pdf

Whistleblowing policy

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

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Due diligence

Managing some parts of our supply chain carries inherent risks of adverse social or environmental impact due to less direct oversight and control of their working conditions and recruiting practices. These would include ships under construction or dismantling where employment conditions of subcontracted workers could present a risk, as does the use of third-party manning and crewing agencies for our shipping businesses. In both situations the use of on-site visits, audit type process and formalized assessments is employed. In addition, the type of ships directly managed (LNG) are relatively sophisticated, and as a sector, are less exposed to unsatisfactory labour practices.

The "K" Line Group has also developed Corporate Social Responsibility Guidelines for Supply Chain which details our requirements for suppliers, including adherence to abolition of forced and child labour. The Guidelines can be found here:
https://www.kline.co.jp/en/csr/group/supplychaincsrguideline/main/0/link/CSR_Guidelines_for_Supply_Chain.pdf

The Group Operating units have extensive and rigorous risk management and compliance processes in place and risks associated with human trafficking is included in these processes and will be managed and monitored on an ongoing basis by the company's risk function in conjunction with other relevant business unit managements.

Awareness-raising Programme

"K" Line Group has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015.
- what external help is available, for example through the Modern Slavery Helpline.

It should also be noted that a transportation group such as "K" Line Group must already ensure that their vessels are not used for illegal purposes including people trafficking. As part of this we engage with third party contractors and suppliers to ensure they have procedures in place to protect against illegal activity such as human trafficking and Modern slavery.

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Mr. Akira Misaki
Managing Director
"K" Line Holding (Europe) Ltd.
22nd April 2022