

# Modern Slavery Act Statement

UK - 2024





**Policies in relation to slavery and human trafficking:**

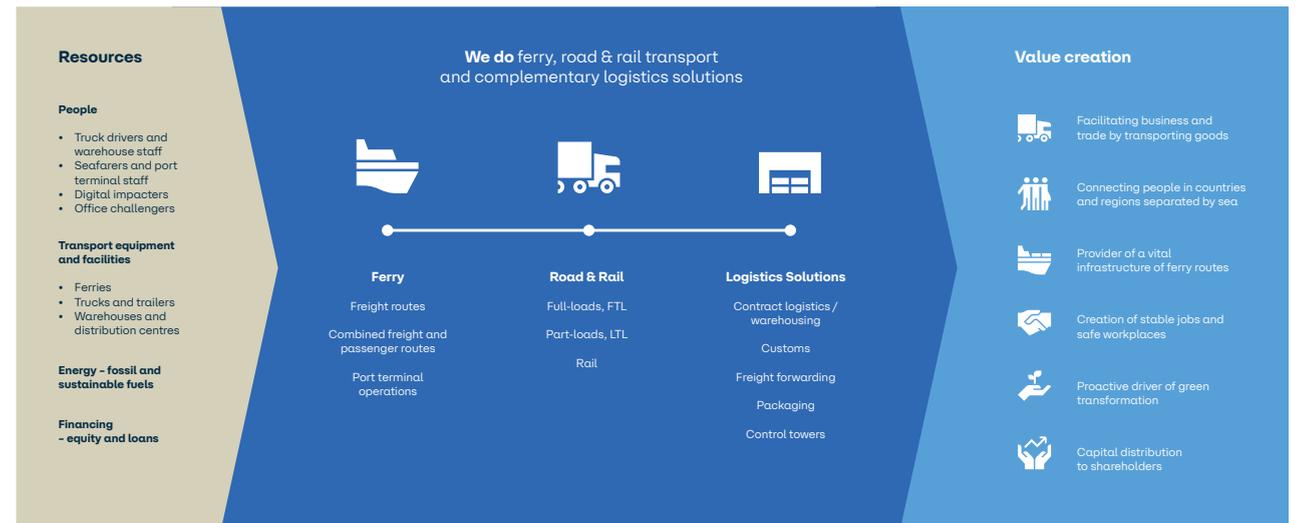
DFDS is dedicated to eradicating modern slavery and human trafficking from our supply chain and all aspects of our organisation. We prioritise transparency and awareness in these efforts. Through our Human Rights policy and procedures, we not only ensure compliance with national laws but also uphold international conventions safeguarding employee rights, including those employed through third parties. Our 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.

Being members of IMPA ACT, a responsible supply chain

management program, 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

**Business model**



same, incorporating relevant assessments. Training programs 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 Eco-Online, 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 preparations for the Corporate Sustainability Reporting Directive (CSRD), we have conducted a 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. 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 are conducted both internally and with support of external partners. The external auditing partners were onboarded in 2023 and in 2024 we conducted 199 audits, unfortunately fewer than targeted due to issues related to an external partner. The audits have resulted in identification of non-conformities with relevant follow-up actions and a few actions leading to blacklisting suppliers. In 2025 we will continue the audit programme and plan to perform a further 160 audits thereby continuing with our significant focus on ensuring supplier compliance.

To support this work, in 2024 we established a human rights review group whose role is to collect input from across the DFDS organisation to facilitate that human rights are being prioritised throughout the DFDS business. The review group reviews and considers 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 (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.

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.

**Training on modern slavery and trafficking:**

We recognise that the risk of modern slavery is not static. We therefore strive to ensure and in 2024 we expanded our logistics operations into non-OECD markets. In light of that we continue to strive to ensure our 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. In 2024, we ensured the mandatory completion of our online Code of Conduct training for all relevant employees which emphasises and reiterates our values and ethics and the responsibilities of all our employees.

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 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.

In 2024, we launched a “Speak-Up” promotional campaign for all our colleagues highlighting how to report anything which isn’t right and make it easy for everyone to access our Codes of Conduct and our employee handbook. We continue with further awareness 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.

This statement has been approved by the Board of Directors of DFDS A/S on May 5th 2025.

Torben Carlsen  
Chief Executive Officer

