

Wallenius Wilhelmsen  
Group's UK Modern  
Slavery Statement 2025

# Wallenius Wilhelmsen Group's UK Modern Slavery Statement for the financial year 2025

This statement is made by Wallenius Wilhelmsen ASA (“the Group”) and its UK subsidiaries, Wallenius Wilhelmsen Solutions UK Ltd, Wallenius Wilhelmsen Ocean UK and WWL ALS UK International Ltd for the financial year 1 January 2025 to 31 December 2025. It outlines the steps taken to prevent modern slavery and human trafficking across our UK business and supply chains, in accordance with Section 54 of the UK Modern Slavery Act 2015. The measures described apply to all UK entities and entities owned or controlled by the Group.

Even though not all the entities in the group are required to publish modern slavery statements, we consider the principles of the Acts to be basic principles to which the entire group is committed.

Our aim is to seek to ensure that modern slavery is not present in our operations and supply chain. Modern slavery is a grave violation of human rights. It is the illegal exploitation of people for personal or commercial gain, covering a wide range of abuse and exploitation, including human trafficking, forced and bonded labor, servitude and slavery.

This Statement is approved by the Board of Directors and signed by the Chief Executive Officer & President of the Group’s parent company, Wallenius Wilhelmsen ASA.

## Description of the group

The Group is a global leader in vehicle transportation and logistics. Our value chain extends from our customers’ factories—original equipment manufacturers of world-class vehicles and machinery—through our inland logistics network and eight terminals, to a fleet of 127 vessels operating across 15 trade routes and serving six continents, and onward to around 70 processing centers worldwide before reaching the end consumer. With approximately 12,000 dedicated colleagues onshore and at sea, we recognize that our activities may influence and impact the human rights of our employees and individuals within our supply chain.

Our supply chain is large and complex, with several layers of suppliers and sub-suppliers. These suppliers provide us with a broad range of services and products. In addition to ship managers who manage our vessels, our key suppliers include energy providers, shipyards for building, repairing and recycling vessels; manufacturers and sellers of equipment we use at terminals and processing centers; stevedores and labor at our terminals and processing centers; and providers of IT products and services. We recognize that our activities may influence and impact on the human and labor rights of these workers. As such, we require our suppliers to comply with applicable laws, respect internationally recognized human rights, including the right to freedom from slavery, human trafficking, or forced labor.



## Our approach to preventing modern slavery

We are committed to respecting human rights and preventing modern slavery across our business everywhere we do business. We embrace the internationally recognized UN Universal Declaration of Human Rights and the International Labour Standards (ILO Declaration on Fundamental Principles and Rights at Work).

Respect for human and labor rights is embedded in our [Code of Conduct](#) and group people policy. In our code of conduct, we condemn all forms of forced labor, including modern slavery, trafficking, and all other exploitative working conditions. We are also opposed to cooperating with entities that employ children under the legal working age. A child means any person under 15 years of age, unless national laws and regulations stipulate a higher mandatory school age or minimum working age, in which case the higher age shall apply.

Our human rights policy specifies the key principles, objectives, and commitments to honor human and labor rights. The policy explicitly bans any form of modern slavery in our operations and supply chain. This includes, but is not limited to, human trafficking, forced labor, exploitative working conditions and practices, slavery, and child labor.

Human rights are also a core part of our [Supplier Code of Conduct](#) and our group procurement policy which our suppliers must agree to comply with when entering into a contract with us.

### Our Human Rights Due Diligence (HRDD)

We assess human rights across our value chain to determine which specific rights are most relevant for us, followed by a mapping of existing mitigating actions. Our HRDD is based upon the OECD Guidelines for Multinational Enterprises and UN Global Compact and Guiding Principles on Business and Human Rights and is updated annually. The due diligence involves a desktop analysis, development of a systematic process and workshops with a dedicated human rights task force, representing key staff from human resources, legal, safety, emergency & security, procurement and operations in key geographies. Scenarios are identified to concretize potential and actual local and regional human rights risks. This is followed by a likelihood and impact assessment to prioritize key risks and mitigating actions. Regular engagement is key to assessing how risks to modern slavery evolve and to assessing the effectiveness of actions.

In 2025, we strengthened our human rights due diligence scoring methodology. A defined threshold for identifying salient human rights risks was introduced, based on both severity and likelihood, to improve prioritization and ensure focus on the most significant actual and potential impacts.

In 2025 we also initiated heightened due diligence assessment with a specific focus on conflict affected areas.

The salient modern slavery risks identified in the human rights risk assessment include:

- **Exploitative working conditions:** Risk of adversely impacting human rights at various locations in the value chain, such as on-board vessels, at terminal operations, new build yards, and recycling yards.
- **Stowaways on vessels:** The risk of stowaways on board vessels which are victims of modern slavery by human traffickers and smugglers. During 2025, we discovered 2 stowaways on our vessels.
- **Migrants picked up at sea and land:** Risk of migrants being harmed when encountered or intercepted at sea, including risks to their safety, dignity and basic rights. We did not encounter any migrants in distress at sea in 2025. However, it remains a potential risk for us, and we recognize our duty pursuant to international law for ships to (attempt to) rescue persons in danger at sea.

## Steps taken to prevent modern slavery in 2025

In 2025, we took several steps to strengthen our approach to respecting human rights, including the prevention of modern slavery, as outlined below:

### Governance and management

During 2025, we continued work to update our Human Rights Due Diligence methodology with the support of external experts. This work includes a structured gap assessment comparing our existing Human Rights Framework with an external Human Rights and Environmental Due Diligence Framework aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

### Awareness raising

To raise awareness of human rights in the organization, in 2024 we relaunched the digital mandatory human rights training for IT enabled employees to raise awareness of Wallenius Wilhelmsen's commitments, policies, due diligence approach and key risks through practical scenarios. By 2025, 90% of the target group had completed the training. The expected outcome is increased awareness and consistent understanding of our human rights commitments across the workforce and value chain.

### Alert Line

Wallenius Wilhelmsen has a Group-wide [Alert Line](#). This is a global whistleblowing system for our stakeholders to submit concerns about potential breaches of the Group's business standards. It explicitly states modern slavery, and other human rights breaches as examples to report. The Alert Line is hosted by an independent third party and stakeholders can report concerns confidentially and anonymously and as per regulations in relevant jurisdictions. This ensures that the group has a professional way of handling potential breaches of laws and regulations and self-imposed business standards. All reports submitted via the Alert Line are investigated promptly and objectively.

When a report is received, we conduct due diligence to collect facts about the case, determine whether the allegations are valid and clarify if we or our suppliers are involved. If the group, through its actions, directly causes or contributes to harmful human rights impacts, the company will promote access to and/or provide fair remediation. There were no confirmed incidents of modern slavery reported in 2025. The number of cases reported to Alert Line provides an indication of whether implemented measures are effective. Although, we recognize that the number of cases reported to Alert Line is likely under-reported.

This policy is communicated throughout the Group and is available publicly on our website. Further details can be found at [Governance - Wallenius Wilhelmsen](#). Like previous years, also in 2025 we have had training and raised awareness of the Alert Line to encourage employees to report any potential breaches and concerns about non-compliance.

We have also established a dedicated communication channel for information requests as required by the Norwegian Transparency Act. We received one query in 2025. This inquiry primarily concerned potential downstream human rights risks linked to the transportation of customer products, including situations where such products may be used in conflict-affected or high-risk areas.

In responding to this request, the company explained that such risks typically arise in the downstream value chain, where Wallenius Wilhelmsen does not retain ownership of, or operational control over, products following delivery, and therefore has limited ability to monitor or influence end use. The company's assessment and responses were based on its risk-based human rights and integrity due diligence processes, including customer due diligence, sanctions and adverse media screening, country risk classification, and scenario-based assessments in heightened-risk contexts.

The company further clarified that while it does not systematically monitor end use of customer products after delivery, identified risks are assessed based on severity, leverage, and the company's connection to the potential impact. Where relevant, such matters may be escalated for additional review and consideration of risk-mitigation measures.

## Code of conduct

Our corporate Code of Conduct include our commitment on preventing exploitative working conditions, including modern slavery and trafficking. Training on the Code of Conduct and Alert Line is mandatory for all new employees as part of their onboarding process. They are also periodically required to undertake further training throughout the course of their employment period. In 2025, as previous years, we also updated and rolled out a mandatory training for all IT-enabled employees, to refresh their knowledge on different topics in the code of conduct. The full Code of Conduct e-learning training launched in 2024 have been completed by 99 % of IT enabled employees, and the refresher training launched in 2025 has been completed by 87 % of our IT enabled employees.

## Supplier code of conduct

We have in our Supplier Code of Conduct (SCC) a dedicated section on upholding human and labor rights which includes preventing all forms of modern slavery including forced or compulsory labor and human trafficking.

We recognize that our activities may influence and impact human rights and working conditions in our supply chain. As such, we require suppliers to comply with applicable laws, respect internationally recognized human rights, including the right to freedom from slavery, human trafficking, or forced labor. Our SCC stipulates our expectation that all our suppliers live up to the UN Universal Declaration of Human Rights and the International Labor Standards (**ILO Declaration on Fundamental Principles and Rights at Work**). The Group communicates these expectations to suppliers, subcontractors, and business partners through its procurement policy and SCC.

The company conducts integrity due diligence on potential new and existing business partners, and human rights are included. Screening is performed on all business partners in high-risk countries. The process involves screening towards relevant

sanction lists and adverse media, including attention on potential suppliers' human rights record and working conditions. The business partners are also monitored in our risk scoring tool. This enables us to have a live overview of our high-risk suppliers, and ensures that we identify any negative changes. We have implemented a supplier assessment questionnaire for suppliers with operations in high-risk countries. The questionnaire includes topics on human rights and working conditions.

## **Shipyards and ship recycling**

Shipbuilding- and repairs have been associated with human and labor rights risk, and new vessels are our greatest investments. While we have several new vessels under order, we conducted ESG due diligence audit of the ship yard during the selection process in 2023, and again in 2025. The audits, which were conducted in 2023 and 2025 by external experts, covered human and labor rights such as forced labor. The audit findings are included in the monitoring plan agreed with the shipbuilding yard. The monitoring plan, which covers sustainability aspects including human and labor rights is regularly followed up during the building period. The monitoring plan will be key to assess the effectiveness of implemented actions from the findings. The outcome is to ensure safer working conditions and respect for human and labor rights at a key supplier.

As part of our commitment to responsible and transparent ship recycling, we continued our participation in the Ship Recycling Transparency Initiative and its steering committee.

## **Stowaways on vessels**

We have identified a risk of stowaways on board vessels. Stowaways are typically victims of modern slavery by human traffickers and smugglers. When stowaways are found on a vessel after leaving the port of departure, guidelines are in place as prescribed by IMO in Resolution 13 (42): FAL Convention and strictly followed. P&I clubs are consulted to ensure the safety of stowaways when considering potential ports for disembarkation. We also cooperate closely with port and terminals to prevent this illegal activity. Mitigating actions at high-risk areas are ongoing and include clearly visible crew, ID checks, security guards at the entry points of the vessels, CCTV-systems, manual cargo inspections and thermal screening cameras. Two of the high risk areas identified was Gothenburg and Southampton, as a result all trunks and back seat on cars are checked prior to entering the vessels and dog searches have been conducted. These initiatives aim at reducing the likelihood of stowaways on vessels and terminals.

## **Migrants on vessels**

Should migrants in distress be picked up at sea, we have implemented a procedure which follow practices as per IMO, including the 1982 UN Convention on the Law of the Sea and the 1974 International Convention for the Safety of Life at Sea and advise from local coast guards.

## **Procurement Process**

Our Procurement Policy requires all suppliers, at a minimum, to align with the ESG standards set out in our Supplier Code of Conduct. The Code is aligned with internationally recognised frameworks, including the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

In addition, we continued to strengthen our due diligence processes for new business partners, placing increased emphasis on human rights risks and the prevention of modern slavery.

## Risk management

We work to integrate ESG risks including modern slavery into our enterprise risk management (ERM). Risk identification is an integral part of our double materiality assessment which assesses our impacts on the environment and society. Key risks are included in the corporate risk register. We are working to establish a risk management system that will improve documentation of risk assessments trends and monitoring of our risk mitigations.

## Assessing the effectiveness of our actions

Assessing the effectiveness of our actions to address modern slavery risk is essential for identifying areas of improvement and achieving better outcomes.

We use various processes and indicators to measure how effective our actions are to identify, address and prevent modern slavery risks within our operations and supply chain. Over 2025, we assessed the effectiveness of our actions across the following key performance areas:

**Supplier questionnaire:** In 2025 we have continued to implement the supplier assessment questionnaire for key suppliers with operations in high-risk countries. The questions in the questionnaire cover health and safety, human rights and working conditions. Through this process, we have been monitoring the number of suppliers engaged, and the number of suppliers that have completed the questionnaire as indicators of the effectiveness of this initiative. As we continue engaging with high-risk suppliers, we aim to refine and strengthen our questionnaire to ensure the questions remain effective in identifying potential risks. As per December 2025, 412 questionnaires has been received from existing or potential suppliers.

**Training:** In 2024, we relaunched mandatory human rights training for IT-enabled employees to raise awareness of Wallenius Wilhelmsen's commitments, policies, due diligence approach, and key risks through practical scenarios. We have been monitoring completion rates to help drive awareness of modern slavery risks across the business. By 2025, 90% of the target group had completed the training, which helps us track the effectiveness of this initiative.

**Modern slavery reports:** We also track the reports about possible modern slavery issues through the Group-wide Alert Line, as an indicator of how effective our steps are in terms of addressing modern slavery risks (although we do recognize that such issues can be underreported). In 2025, there were no confirmed incidents of modern slavery reported.

**Contracts:** We have worked to further include ESG clauses (including human rights) into our contracts. By 2025, all our time charter vessels contracts include our supplier code of conduct and our key ship managers also reference their code of conduct, including human rights, in the contract with repair yards. The monitoring plan for the shipbuilding yards has also been established to help assess the effectiveness of the implemented actions to address audit findings in 2023. In 2025, a new external audit was conducted. The findings indicated that the actions and discussion following previous audits have contributed positively to raise awareness of ESG with the supplier.

**Risk scoring tool:** Business partners in high-risk countries are monitored in our risk scoring tool. This enables us to have a live overview of our high-risk suppliers and ensures that we identify any negative changes.

We have plans to further enhance our processes for assessing the effectiveness of our actions, as outlined in the section below.

## How Will We Proceed?

Building on the work completed in 2025, we are well positioned to further strengthen our human rights agenda and preventing modern slavery from taking place across our business and supply chains.

### Key initiatives going forward will include:

- We will continue to further operationalize human rights in our procurement processes and supplier monitoring. As part of this work, we are currently expanding ESG clauses in our contracts with one of our key ship managers. These initiatives will enable us to better identify high-risk suppliers and follow them up.
- We will further strengthen our assessment and monitoring of risks in the supply chain by conducting integrity due diligence on all high-risk suppliers. In parallel, we will continue to raise awareness of the Group's Human Rights Policy and support its implementation across all parts of the company and towards suppliers.
- Continue working on the heightened human rights due diligence of conflict-affected areas.
- To further strengthen our supplier management practices, we are enhancing the procurement function through the establishment of a dedicated Vice President of Procurement role.
- Continue to conduct annual reviews and drive continuous improvement of relevant policies and codes of conduct.
- We will continue to identify actual and potential modern slavery risks within our operations and supply chain.
- While we assess the effectiveness of our actions through various means, we recognize that further work is required to strengthen our risk assessment processes and the monitoring of risks within our supply chain. In 2026, we plan to enhance collaboration with the Human Rights Task Force as part of our annual human rights due diligence and further evaluate the effectiveness of implemented mitigating actions.

### Statement approval

This Statement was reviewed and approved by the Board of Directors of Wallenius Wilhelmsen ASA, as the parent entity, and Lasse Kristoffersen, the President and Chief Executive Officer on 5th May 2026.

The Statement is signed by Lasse Kristoffersen, in his capacity as Chief Executive Officer of Wallenius Wilhelmsen ASA.



Lasse Kristoffersen

Chief Executive Officer & President  
5th May 2026