

UK Modern
Slavery
Statement
2021

Wallenius Wilhelmsen Group's UK Modern Slavery Statement for the financial year 2021

This statement has been prepared to comply with the legal requirements of the UK Modern Slavery Act 2015 (the "Act").

The statement is valid for the Wallenius Wilhelmsen ASA group ("the Group"). It sets out the steps taken by the Group during 2021 to seek to prevent modern slavery from taking place in our business and supply chains. Please see the group organization chart in the annual report.

Even though not every entity in the Group is required to publish Modern Slavery Act Transparency Statements, we do consider the principles of the Act to be basic principles and the entire Group should act in accordance with these. Hence, our aim is to ensure that modern slavery is not part of any business in the Group.

Modern slavery is a grave violation of human rights. It is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including human trafficking, forced and bonded labor, servitude and slavery.

Description of the Group

The Group is a global leader in vehicle transportation and logistics. Our value chain stretches from the plants of our customers (original equipment manufacturers of world-class car and machinery), onboard our trucks, through our eight terminals, our 130+ vessels servicing 15 trade routes to six continents and 66 processing centers around the world before reaching the end consumer.

With 8,200 employees and operations in 29 countries, we recognize that our activities may influence and impact the human rights of our stakeholders.

Our approach to preventing modern slavery

We are committed to respecting human rights in general and preventing modern slavery across our business in all countries and regions in which we do business. We recognize the internationally recognized UN universal declaration of human rights and the International Labour Standards (ILO declaration on fundamental principles and rights at work).

The respect for human and labor rights is embedded in our code of conduct. The code specifies that the Group condemns all forms of forced labor and all exploitative working conditions and does not employ, or cooperate, with entities that employ children under the legal working age.

Steps taken to prevent modern slavery in 2021

In 2021, we took several steps to strengthen our approach to respecting human rights including modern slavery. Our efforts included the following:

1. Human rights policy

Development of a human rights policy which specifies the key principles, objectives and commitments on human and labor rights. The policy explicitly prohibits 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.

2. Human rights risk assessment and due diligence

The human rights policy was operationalized with a human rights risk assessment and due diligence (HRDD) in accordance with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights.

The assessment involved a desk top analysis, development of a systematic process and several workshops including human resources, legal, safety, emergency & security and procurement. We also consulted an external human rights expert to verify our approach. Human rights were assessed across our extensive value chain to determine which factors are relevant for us and decide why others are not relevant. Existing mitigating actions were also mapped. For the relevant risks, scenarios were developed, likelihood and impact defined and assessed to prioritize key risks and mitigating actions. Key human rights most relevant to our business include:

Forced labor amongst seafarers: Seafarers on Wallenius Wilhelmsen-owned and bareboat charter vessels are working for either Wallenius Marine Ship Management or Wilhelmsen Ship Management. Both vendors have high standards for health, safety and working conditions. During the pandemic, several NGOs have flagged that due to the crew change crisis caused by Covid-19 restrictions and closed borders, seafarers may effectively end up being forced to stay onboard against their will. We have worked with our ship manager vendors to secure the well-being of our seafarers whilst delivering uninterrupted operability of our fleet. A key focus has been to ensure shore leave when locally permitted and safe to do from a health risk perspective, safe and efficient crew change, and on ensuring physical and mental health of our seafarers.

Stowaways on vessels: Human traffickers and smugglers can be behind stowaways onboard our vessels. Stowaways are at risk of becoming victims to modern slavery upon arrival at ports. We have therefore put in place measures to prevent this illegal activity. We cooperate with ports and terminals and install preventive measures in terminals and ports especially for high-risk shipping lanes. Examples of preventive measures are ID-checks, CCTV-systems, manual cargo inspection and thermal screening cameras. In the case stowaways are found on a vessel after leaving port of departure, recommended practice as prescribed by IMO in Resolution 13 (42): FAL Convention with guidelines related to stowaways are strictly followed. P&I clubs are also consulted to ensure the safety of stowaways when considering potential ports for disembarkation.

Migrants in distress picked up at sea: Wallenius Wilhelmsen recognizes our duty pursuant to international law for ships to attempt to rescue persons at danger at sea. Exercising this duty may lead to us taking onboard migrants that have been victims of smugglers or human traffickers. In the case where migrants in distress are picked up at sea, recommended practice is followed as per IMO's regulations. P&I clubs are consulted to ensure the safety of migrants when considering potential ports for disembarkation.

Shipyards and ship recycling: For decades, we have had focus on eliminating adverse human and labor rights impact in this area. This is because vessel recycling yards are a known hotspot for human rights violations and cases of modern slavery have been revealed. We are one of the founding members of the Ship Recycling Transparency Initiative, an online platform for sharing information on shipping companies recycling policies and practices.

3. Sustainable Supplier Code of Conduct

We have developed a sustainable supplier code of conduct communicated to our suppliers and other stakeholders. It outlines our expectations relating to sustainability in general and human rights specifically. We actively seek to work with third parties who support our approach and standards, and we are committed to undertaking ongoing due diligence within our business to identify and address any actual or potential adverse impacts we or our suppliers may cause.

During 2021, we digitally distributed the new supplier code of conduct to 25 targeted suppliers asking for digital acknowledgement and engaged them by asking for their suggestions for improvement. We received acknowledgement from all but one supplier, as well as positive feedback on both the process and the contents of the new code of conduct.

4. Sustainable procurement policy

The sustainable procurement policy guides our procurement activities: We seek to identify risks within our supply chain and collaborate with suppliers to manage those risks and prioritize suppliers who are committed to responsible business practices.

How will we proceed?

The work done in 2021 provide a solid foundation for further strengthening our human rights agenda and preventing modern slavery from taking place in our business and supply chains.

Key initiatives going forward will include:

1. Ensure that the Group's human rights policy is understood and implemented in all parts of our company and towards our suppliers.
2. Expand our stakeholder engagement to a wider group of internal stakeholders and consult external stakeholders such as NGOs or industry network.
3. Conduct internal awareness campaigns and training, as well as present initiative and results to management and the board.
4. Include human rights and modern slavery risks in the scope of our established whistle-blower channel.
5. Execute continuous assessment of risks in our supply chain.

Grievance mechanisms and remediation

Stakeholders may raise concerns regarding our human rights impacts by using the Wallenius Wilhelmsen Alert Line.

Details can be found at www.walleniuswilhelmsen.com/who-we-are/governance.

If the Group, through its actions directly cause or contribute to harmful human rights impacts, the company will promote access to and/or provide fair remediation. This policy is communicated throughout the Company and is available publicly on our website.

The Board of Directors of Wallenius Wilhelmsen ASA has reviewed and approved this statement. The statement is signed by CFO and acting CEO, Torbjørn Wist.



Torbjørn Wist
Acting CEO and CFO

17.02.2022