

**UK Modern
Slavery Statement
2022**

Wallenius Wilhelmsen Group's UK Modern Slavery Statement for the financial year 2022.

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" or "WalWil"). It sets out the steps taken by the Group during 2022 to seek to prevent modern slavery from taking place in our business and supply chains. Please see an organization chart of the group in the annual report.

Even though not all the entities in the Group are required to publish Modern Slavery Act Transparency Statements, we do consider the principles of the Act as basic principles the entire Group is serious about preserving. 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 8 terminals, our 126 vessels servicing 15 trade routes to six continents, and 66 processing centres around the world before reaching the end consumer.

With 8200 employees and operations in 29 countries, in addition to 2700 seafarers employed on our vessels by external ship management companies, 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 and 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 that we shall not employ, or cooperate, with entities that employ children under the legal working age of below the age of 15, whichever is the lowest. We also have a specific human rights policy which specifies the key principles, objectives and commitments on 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. Furthermore, human rights are a core part of our supplier code of conduct and our sustainable procurement policy.

In 2021, we conducted 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 desktop analysis, development of a systematic process and several workshops including human resources, legal, safety, emergency & security, and procurement. 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.

Steps taken to prevent modern slavery in 2022

In 2022, we built upon our human rights risk assessment and due diligence and took several steps to strengthen our approach to respecting human rights including modern slavery. Our efforts included the following:

Awareness raising

To raise awareness of human rights amongst our senior management, we organized a seminar with internationally recognized experts as well as an in-depth workshop with relevant internal stakeholders. We also launched a sustainability gamification training which included our approach to human rights as well as a specific training on human rights. Both courses include modern slavery aspects. The courses are directed to our PC-enabled employees and are provided to new employees as part of the onboarding process when joining WalWil.

Alertline

Our Alertline has been updated to specifically include modern slavery and other human rights breaches as concerns to report.

Code of conduct

Our Code of Conduct is being updated and will have a stronger reference to modern slavery, trafficking and other exploitative working conditions.

Shipyards and ship recycling

We have had focus on eliminating adverse human and labor right impact in this area for decades. 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 and we disclose the vessels that have been recycled (Overview over responsibly recycled vessels).

During 2022, we developed our approach for addressing human rights in preparation of building new vessels. We consulted external experts and included human rights requirements in the tender process in line with our supplier code of conduct and procurement policy. In addition, we will conduct ESG (Environment, Social and Governance) due diligence audits of potential suppliers. We have already completed the tender process to select the ESG due diligence auditor.

Supply chain management

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.

Sustainable supplier code of conduct

Further implementation of a new sustainable supplier code of conduct to communicate to our suppliers and other stakeholders 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 undertake ongoing due diligence within our business to identify and address any actual or potential adverse impacts we or our suppliers may be cause.

Last year, we sought acknowledgement from 25 targeted suppliers of our supplier code of conduct. This year, we followed up with a self-assessment which included specific risks identified through the human rights due diligence process. We also conducted several meetings with one of our key providers of ship management services to discuss human rights issues.

Sustainability self-assessments for suppliers

In 2022, we developed a supplier self-assessment (SSA), to help us better identify and manage the sustainability risks in our supply chain. The SSA was sent to 25 targeted suppliers, and about half had replied by year end. The survey asked 10 questions about the suppliers' environmental, social and governance practices, including if they have a human rights policy in place, and if they have assessed the risk of child and /or forced labor in their operations. More than 60% of respondents (as of 30 December 2022) told us they have a human rights policy in place, and almost 80% have assessed their operations for child and/or forced labor.

How will we proceed?

The work done 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. Continue to raise awareness of the Group's human rights policy and implement it in all parts of our company and towards our suppliers.
2. Continue to expand our stakeholder engagement to a wider group of internal stakeholders and consult external stakeholders such as NGOs or industry network.
3. Present initiative and results to management and the board.
4. Strengthen our assessment and monitoring of risks in our supply chain.

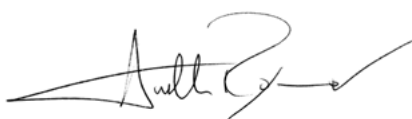
Grievance mechanisms and remediation

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

Details can be found at [Governance – Wallenius Wilhelmsen](#).

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 the Chief Sustainability Officer [date].



Anette Rønnov
Chief Sustainability Officer