

Wallenius Wilhelmsen  
Group's Modern Slavery  
Statement (revised) 2024

# Wallenius Wilhelmsen Group's UK and Australian Modern Slavery Statement for the financial year 2024 (revised)

This Modern Slavery Statement (**the Statement**) has been prepared to comply with the legal requirements of the UK Modern Slavery Act 2015 (**the UK Act**) and the Australian Modern Slavery Act 2018 (**the Australia Act**) (together, **the Acts**). The Statement contains information relevant to the whole Wallenius Wilhelmsen ASA group (**the Group**) and sets out the steps taken by the group during 2024 that seek to identify and prevent modern slavery from taking place in our business and supply chains.

This Statement is a joint statement in relation to the reporting period 1 January 2024 to 31 December 2024.

For the purposes of the Australia Act, this Statement covers Wallenius Wilhelmsen Ocean AS, Wallenius Wilhelmsen Solution Pty Ltd and Melbourne International Roro & Auto Terminal Pty Ltd as reporting entities, which form part of the Group.

For the purposes of the United Kingdom Act, this Statement includes Logistics UK and Wallenius Wilhelmsen Solutions UK Ltd, which form part of the Group.

The information in this Statement that applies to the Group equally applies to the above entities and entities they own and control.

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.

We note that this Statement was revised in December 2025 to meet the reporting criteria under the Australian Act. In particular, the Statement was revised to include further information on how we assess the effectiveness of our actions and our process of consultation on this Statement. This Statement is also signed by a director 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 stretches from our customers' factories (original equipment manufacturers of world-class cars and machinery), onboard our trucks to our eight terminals, to our fleet of 125 vessels servicing 15 trade routes to six continents, and 66 processing centers around the world, before reaching the end consumer. With around 12,000 dedicated colleagues, on shore and at sea, we recognize that our activities may influence and impact the human rights of the people who work for us or are part of 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 in general 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 including Australia. 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.

Key modern slavery risks identified in the human rights risk assessment:

- **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 2024, we discovered 5 stowaways on our vessels.

Going forward we will seek to further strengthen our assessment of potential risks of modern slavery across our value chain.

## Steps taken to prevent modern slavery in 2024

In 2024, we built upon our human rights due diligence process and took several steps to strengthen our approach to respecting human rights including preventing modern slavery as follows:

### **Governance and management**

During 2024, we further strengthened the governance and management of human rights by developing a human rights framework specifying responsibilities and procedures. We updated the Human Rights Due Diligence Framework, and both the group executive team and the board of directors received updates on the status of our human rights work. We also reviewed the governance framework and updated relevant policies, including a new Group people policy which specifies our commitment to human and labor rights and updated our human rights and responsible ship recycling policies which specifically mentions modern slavery risks.

### **Awareness raising**

To raise awareness of human rights in the organization, we developed a digital training module on human rights in 2022. In 2023, the training course was translated into additional languages to reach colleagues whose first language is not English. In 2024, we refreshed the training course and made it mandatory for our IT-enabled employees and achieved a completion rate of 90%.

### **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 2024.

This policy is communicated throughout the Group and is available publicly on our website. Further details can be found at [Governance - Wallenius Wilhelmsen](#). During 2024 we increased training and raised awareness of the Alert Line to encourage employees to report any potential breaches.

We have also established a dedicated communication channel for information requests as required by the Norwegian Transparency Act. We did not receive any queries in 2024.

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.

## Code of conduct

Our corporate Code of Conduct was updated in 2024 to reinforce our emphasis 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 2024, 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.

## Supplier code of conduct

We have updated our Supplier Code of Conduct (**SCC**) in 2024. The SCC has 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 SSC 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 SSC.

The Group conducts integrity due diligence on potential new and existing business partners, and human rights issues are included. Screening is performed on all business partners in high-risk countries. The process involves screening of relevant sanction lists and adverse media, including attention on potential suppliers' human rights record and working conditions. The business partners are also placed on monitoring 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.

In addition, in 2024 we implemented a supplier assessment questionnaire for suppliers with operations in high-risk countries. The questionnaire includes topics on health and safety, human rights and working conditions. Moreover, we performed integrity due diligence on all our tonnage providers. We also worked to include Environment, Social and Governance (**ESG**) clauses, encompassing human rights, in our contracts with time charter vessels which are outside of our fleet management control.

## Shipyards and ship recycling

Shipbuilding- and repairs have been associated with human and labor rights risk, and new vessels are our greatest investments. While ordering several new vessels, we conducted ESG due diligence audits during the selection process. The audits, which were conducted in 2023 by an external expert, covered human and labor rights such as forced labor. The audit findings were included in the contractual agreement and a monitoring plan agreed with the shipbuilding yard in 2024. The monitoring plan will be followed up during the building period. It will be key to assess the effectiveness of implemented actions to address the findings.

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. To address this risk, in critical ports and routes which are considered a high risk of stowaways, CCTV and dogs have been taken into use. CCTV is also available on the vessels to monitor any activity. Many terminals have taken use of heat-searching cameras to help locate stowaways. One of the high risk areas identified was Gothenburg, as a result all trunks on cars are checked prior to entering the vessels.

## Procurement policy

Our procurement policy was also updated in 2024. It requires that all suppliers must align with the ESG standards defined in our SCC as a minimum. We are continuing to strengthen our due diligence of new business partners, to include human rights and 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 2024, we assessed the effectiveness of our actions across four key performance areas, set out below.

**Supplier questionnaire:** As discussed above, in 2024, we introduced a supplier questionnaire for those operating in high-risk countries, with questions covering 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.

**Training:** We recently updated our modern slavery training program and made it mandatory for all IT-enabled employees. To support this initiative, we have been monitoring completion rates to monitor and help drive awareness of modern slavery risks across the business, and which help us track the effectiveness of this initiative. As previously noted, we achieved a completion rate of 90% for 2024. Moving forward, we will look to continue to review feedback from the training to identify knowledge gaps and opportunities for further improvement.

**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 2024, there were no confirmed incidents of modern slavery reported.

**Contracts:** As noted above, in 2024, we worked to include ESG clauses (including human rights) into our contracts with time charter vessels which are outside our fleet management control. We track the number of contracts that include such ESG clauses to help us measure our response to modern slavery. We also included the audit findings from our ESG (including human and labor rights) audits for some new vessels in contractual agreements and monitoring plans with the shipbuilding yard in 2024. The ongoing implementation of the monitoring plan will be followed up and will help us assess the effectiveness of the implemented actions to address the audit findings.

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?

The work done in 2024 provides 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:

- Continuing to raise greater awareness and consistent implementation of the group's Human Rights Policy across all areas of our Group.
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- Further strengthening our supplier management practices.
- Continuing to enhance our stakeholder engagement approach and actively consulting with external stakeholders such as NGOs and industry networks.
- Presenting and delivering updates on key initiatives, their progress and outcomes to senior management and the board of directors.
- Further strengthening and refining our risk assessment processes and our monitoring of risks in our supply chain.
- Conducting annual reviews and continuous improvement of relevant policies and codes of conduct.
- Continuing to identify the actual and potential modern slavery risks within our operations and supply chain.
- While we assess the effectiveness of our actions in various ways, as described above, we aim to further evaluate the effectiveness of the mitigating actions implemented, in collaboration with the Human Rights Task Force, as part of our annual Human Rights Due Diligence in 2025. In addition, we plan to update our Human Rights Due Diligence methodology to better assess how these actions influence the likelihood and severity of actual and potential modern slavery risks. We also acknowledge that further work is required to strengthen our assessment of risks within our supply chain.

## Consultation

Our Statement (including the revisions to the Statement) was subject to a consultation between the reporting entities listed on the first page. Consultation included providing the statement to senior management at each entity to ensure they were aware of its content and development. Additional key stakeholders have been consulted in the development of this Statement, being the Vice President of Culture and Diversity, Inclusion and Belonging, Compliance, and the Australian Human Resources department.

## Statement approval

This Statement was reviewed and approved on behalf each reporting entity and by the Board of Directors of Wallenius Wilhelmsen ASA, as the parent entity, and Lasse Kristoffersen, the President and Chief Executive Officer on 13 January 2026.

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

A handwritten signature in black ink, appearing to read 'Lasse Kristoffersen', with a long horizontal stroke extending to the right.

Lasse Kristoffersen  
Chief Executive Officer & President  
13 January 2026