

MODERN SLAVERY ACT 2025



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INTRODUCTION

At Scan Global Logistics Group (“we”, “our”, and “us”), we regard human rights as a fundamental principle that must be upheld at all times. We are committed to maintaining vigilance, staying informed of global developments and regulatory changes, and continuously strengthening our efforts to combat modern slavery. As we work towards our purpose – to make the world a little less complicated – we are dedicated to advancing our sustainability ambitions and consistently improving our processes to meet the high standards we set for our business.

This statement is issued in accordance with section 54(1) of the UK Modern Slavery Act 2015 and Part 2, section 14(1) of the Australian Modern Slavery Act 2018. It outlines the steps we take to ensure that modern slavery does not occur within our operations or supply chains.

This statement covers the financial year from 1 January 2025 to 31 December 2025 and has been approved by the board of directors of Scan Global Logistics Group on June 16, 2026.

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We maintain a long-standing commitment to respecting human rights in our business and supply chains while complying with the human rights and labour law regulations. We respect and enforce the principles of the 1998 International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights, and other key national and international human rights standards, such as the International Bill of Human Rights. We have been a signatory to the United Nations Global Compact since 2015 and support the ten principles covering the four pillars: labour, environment, anti-corruption and human rights. We have a zero-tolerance policy against all forms of modern slavery, forced or compulsory labour and human trafficking and are firmly committed to ensuring the abolition of any such crimes against humanity.

We have signed the World Economic Forum Industry Charter for Humanitarian Supply Chain Resilience and conform to the OECD Guidelines for Multinational Enterprises. We respect every employee’s right to favourable working conditions and comply with laws and regulations regarding wages and benefits. One of our four virtues is “respect”, so we are firmly committed to treating every person who carries out services for Scan Global Logistics Group with respect and dignity.

OUR BUSINESS, ORGANISATION, STRUCTURE AND PURPOSE

WHO WE ARE

We are a global, asset-light freight forwarding and logistics provider operating across multiple transport modes, including air, ocean, road and rail. We deliver end-to-end supply chain solutions supported by value-added logistics services and project-based operations.

Founded in 1975, we employ more than 5,100 employees and serve approximately 29,000 customers globally across a wide range of industries, including Aid and Relief, Automotive, Fashion and Retail, Pharma and Healthcare, and Renewables.

We operate through a global network spanning 61 countries across Europe, the Middle East and Africa, Asia, the Pacific, North America, Latin America, and the Nordics. This global footprint enables us to support international supply chains by combining local expertise with global reach.

BUSINESS MODEL AND OPERATIONS

We operate an asset-light business model and do not own significant transport assets. Instead, we collaborate with a global network of third-party carriers, agents and suppliers to deliver logistics services..

We act as a single point of accountability for our customers, coordinating and managing freight movements across our partner network to ensure efficient, compliant and reliable logistics solutions.

Given the nature of this operating model, our activities extend beyond our direct operations and involve a wide range of third-party business partners across multiple jurisdictions.

INTEGRITY, HUMAN RIGHTS AND HUMANITARIAN COMMITMENT

We rely on a shared understanding of how our employees and business partners are expected to conduct business responsibly and with integrity.

We apply a principled and human-centred approach across all activities, respecting internationally recognised human rights and the equal dignity of all individuals, while promoting transparency and ethical conduct.

We are a leading provider of complex humanitarian logistics solutions for UN agencies and NGOs, delivering critical logistics support and contingency planning in challenging environments.



We are committed to conducting our business in a responsible, ethical and sustainable manner, guided by internationally recognised frameworks, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights (UNGPs), ILO Conventions and OECD Guidelines.

We have a zero-tolerance approach to modern slavery, forced labour, child labour, discrimination and corruption. These commitments apply across our operations and throughout our value chain.

» **POLICIES FRAMEWORK**

Our commitments are supported by a comprehensive set of group-wide policies applicable to all employees, subsidiaries and relevant business partners, including, among other things:

- Code of Conduct
- Human Rights Policy
- Third Party Code of Conduct
- Sustainable Procurement Policy
- Anti-Corruption Policy
- Whistleblower Policy
- Environmental Policy
- Data Ethics Policy
- Diversity and Inclusion Policy
- Health and Safety Policy
- Personal Data Protection Policy

These policies establish clear expectations regarding ethical conduct, human rights, labour standards and responsible business practices.

Each year, we review all our policies and adjust them to remain compliant with national and international human rights laws and regulations.

» **CODE OF CONDUCT AND BUSINESS ETHICS**

Our Code of Conduct sets out the standards for ethical, lawful and transparent behaviour expected of all employees and business partners. It includes a zero-tolerance approach to bribery and corruption and provides guidance on responsible business conduct.

Compliance with our Code of Conduct is supported by internal controls, monitoring processes, and mandatory employee training.

» **HUMAN RIGHTS AND LABOUR STANDARDS**

Our Human Rights Policy reflects our commitment to respecting human rights in line with international standards, including the UNGPs and ILO Conventions.

We apply a zero-tolerance approach to modern slavery, forced labour and child labour and expect the same standards from our suppliers and business partners. Our policies also cover freedom of association, equal treatment, non-discrimination, and fair working conditions.

Human rights due diligence is conducted through risk assessments, stakeholder engagement, and ongoing monitoring of our operations and value chain.

» **RESPONSIBLE SUPPLY CHAIN**

Our third-party Code of Conduct and Sustainable Procurement Policy set clear expectations for suppliers, subcontractors and business partners.

These policies require compliance with human rights standards, health and safety requirements and anti-corruption principles. Suppliers are required to acknowledge and adhere to these standards, and we conduct risk-based assessments and audits of our third-party relationships.

» **WHISTLEBLOWING AND GRIEVANCE MECHANISMS**

We maintain a whistleblower system that is available to both internal and external stakeholders. Reports are handled confidentially and can be submitted anonymously.

The system is supported by independent oversight and includes protections against retaliation. It enables the reporting of concerns related to human rights, labour practices, corruption or other misconduct.

» **TRAINING AND IMPLEMENTATION**

We support the implementation of our policies through mandatory training and awareness programmes. Employees are required to complete training on key policies, including the Code of Conduct and anti-corruption, on a regular basis.

Our policies are embedded across the organisation through governance structures, internal controls and ongoing monitoring.

» **RESPONSIBLE SUPPLY CHAIN**

We require all suppliers and business partners to comply with internationally recognised human rights standards and applicable laws, including those relating to forced labour, child labour, working conditions and non-discrimination.

Our Third-Party Code of Conduct sets clear requirements, which must be cascaded throughout suppliers' own supply chains.

» **SUPPLY CHAINS AND STAKEHOLDER ENGAGEMENT**

We apply a transparent and collaborative approach in our engagement with stakeholders, including employees, suppliers and business partners. We promote awareness of human rights risks and encourage reporting of any suspected misconduct.

We regularly engage with stakeholders as part of our human rights risk assessments and materiality assessments, ensuring that relevant perspectives are reflected in our processes.



PREVENTING, MITIGATING AND REMEDIATING HUMAN RIGHTS RISKS

» RISK MANAGEMENT

We apply structured processes to identify and assess risks of modern slavery across our operations and supply chains.

As a global freight forwarder, we recognise that certain sectors and geographies may present elevated risks, particularly in regions where labour standards may vary.

We conduct risk and saliency assessments across all countries of operation, supported by continuous monitoring and supplier evaluations. These processes enable us to identify, prioritise and manage human rights risks, which are integrated into our Enterprise Risk Management framework.

» DUE DILIGENCE

We apply a risk-based due diligence approach to prevent, mitigate and address human rights risks across our operations and supply chains. This includes supplier assessments, audits, monitoring and ongoing engagement.

We require suppliers to comply with our Third-Party Code of Conduct and work collaboratively with them to implement corrective actions where needed.

KEY DUE DILIGENCE ACTIVITIES IN 2025

Increased Scope of Supplier Due Diligence:

In 2025, we conducted approximately 300 supplier assessments to identify and evaluate potential risks across our value chain.

Strengthened Third-Party Controls:

We reinforced our contractual requirements and monitoring processes to ensure supplier compliance with human rights and labour standards.

Integration into Enterprise Risk Management:

Human rights risks are integrated into our Enterprise Risk Management framework to ensure continuous oversight and governance.

No Severe Violations Identified:

No severe human rights violations, including forced labour or child labour, were identified in 2025.

Training and Implementation:

We provided mandatory training programmes to strengthen awareness of human rights and ethical responsibilities across the organisation.

CONSULTATION WITH GROUP ENTITIES

In preparing this statement, we have consulted with relevant entities within the Scan Global Logistics Group to ensure alignment and consistency in our approach to identifying, assessing and addressing modern slavery risks across our operations and supply chains.

This process includes engagement with key functions and representatives across the organisation to ensure consistent implementation of policies, risk assessments and due diligence activities.

REPORTING, WHISTLEBLOWING AND TRAINING

» SPEAK-UP CULTURE

We promote a culture of openness, transparency and accountability, where employees and external stakeholders are encouraged to raise concerns about any suspected wrongdoing, including potential violations of human and labour rights.

We seek to ensure that concerns can be raised in confidence and without fear of retaliation. Reports can be submitted through multiple channels, including directly to the Global General Counsel, the Human Resources function, the Global VP for People, Leadership & Culture, or via our confidential and anonymous whistleblower system available at scangl.com.

All reports are assessed and investigated, and appropriate actions are taken depending on the nature and severity of the concern.

» INVESTIGATION AND ACCOUNTABILITY

We take all reports of misconduct seriously and investigate matters in accordance with established internal procedures. This includes allegations relating to human rights, labour standards and modern slavery.

Our Compliance and Legal function, supported by the Global General Counsel, oversees and monitors compliance with applicable human rights standards and relevant legislation,

including the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

Where issues are identified, we implement appropriate remedial actions and ensure that lessons learned are incorporated into our ongoing compliance framework.

» TRAINING AND AWARENESS

We support the effective implementation of our policies through mandatory training and awareness programmes across the organisation. To reinforce our values of integrity and responsible conduct, we introduced a dedicated whistleblower training programme, which provides employees with guidance on when and how to report concerns, as well as their rights when doing so.

In addition, all employees are required to complete regular training on key group policies, including human rights, via our global e-learning platform. The training includes assessments, and successful completion is required to demonstrate understanding and compliance. This ensures a consistent and high level of awareness of modern slavery risks across our global workforce.



APPROVAL

After due consideration of the company's modern slavery risks and mitigation actions, the board of directors, in their capacity as the principal governing body, approved this statement on June 16, 2026.

The board of directors consider that the statement is a true and fair account of the company's modern slavery risks and mitigation actions.



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