

## NTG Nordic Transport Group A/S Modern Slavery Statement

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps NTG has taken and is continuing to take to ensure that modern slavery and human trafficking is not taking place within its business or supply chain.

This statement is approved by the Board of Directors in NTG Nordic Transport Group A/S, the parent company in the NTG Group, on 17 May 2021.

### Introduction

As a freight forwarder and logistics provider, NTG delivers value to customers and consumers by facilitating effective and efficient transport solutions for a wide range of goods around the globe. NTG acts as a coordinator and optimizer, using subcontractors such as hauliers, ocean carriers and airlines, to perform the actual transports. NTG is subject to extensive regulatory requirements, and it is imperative for NTG to be compliant with relevant laws. In both our own business and in our supply chain we aim to avoid causing or contributing to any adverse impacts on human rights, and to address and mitigate such impacts if they occur.

This statement sets out the actions we have taken in the 2020 financial year to prevent modern slavery and human trafficking from occurring and steps we will take to further strengthen this in the following financial year.

### Our Policies on Modern Slavery and Human Trafficking

Responsible behavior is part of NTG's core values, and customers and other stakeholders all expect us to conduct our business in a responsible manner. NTG's codes of conduct towards employees and subcontractors form the basis of all actions and activities carried out in our name. Our Codes of Conduct reflect our commitment to acting responsibly with all our business partners and state our values, including our commitment to respect human rights and labour rights. Based on NTG's Codes of Conduct, policies with regard to anti-corruption laws, competition laws and international trade restrictions, such as sanctions and export controls, have been implemented across NTG.

NTG has a group-wide whistleblower system which enables all employees to report via a confidential channel wrongdoings or suspected wrongdoings and violations of law, including the violation of human rights. The principles and procedure of NTG's whistleblower system is laid down in a policy. Additional information, for example a whistleblower FAQ has been made available to all employees to facilitate reporting through the whistleblower system.

### Our Supply Chains

NTG's business model involves the arranging and overseeing of transportation of cargo throughout Europe and the rest of the world by truck, ship, and aircraft. We contract services on behalf of

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customers but subcontract the actual transportation to third-party suppliers. All our business partners globally are as a fundamental principle expected to comply with local laws. When selecting business partners, we aim at appointing partners who share our values as described in our Codes of Conduct. This commitment is reflected in our Code of Conduct for Suppliers and the Code of Conduct for Housing and Rest which set out the requirements which NTG specifies for all its suppliers, including our expectations with regard to human rights.

## Due Diligence Processes

NTG Implemented a standardized third party management process, including the performance of a pre-boarding due diligence for third parties who are interacting on behalf of NTG with the government, for example, agents, customhouse brokers, lawyers, and tax advisors.

## Risk Assessment

In 2020, a group-wide risk assessment was performed on implementation of codes of conduct, awareness of the whistleblower system, anti-corruption, competition law, human rights and foreign trade controls. The outcome of the annual risk assessment forms the basis for NTG's annual mitigation plan which includes training and third party due diligence.

## Further Steps

To ensure that all NTG employees live up to NTG's Code of Conduct, in 2021 all NTG employees (white collar) will receive online training on NTG'S Code of Conduct, dealings with sanctioned countries, NTG's anti-corruption policy and how to handle sensitive information. Further, we will continue to monitor the implementation of our Codes of Conduct and provide in-person training to selected NTG entities.

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