

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 3 August 2023.

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 2022 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.

United Nations Global Compact

NTG became signatory of the United Nations Global Compact (UNGC) in 2021 and supports the ten universal principles on human and labour rights, environment, and anti-corruption, while acknowledging our role in achieving the Sustainable Development Goals. The UN framework is important to our sustainability work as we can demonstrate progress under the guidance of the Sustainable Development Goals and the UNGC principles.

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 suppliers form the basis of all actions and activities carried out in our name. Our Codes of Conduct reflect our commitment to acting responsible 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 regarding anti-corruption laws, corporate social responsibility, data privacy, 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 employees and suppliers 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 and poster has been made available to all employees to facilitate reporting through the whistleblower system.

Training: Code of Conduct, policies and new legislation

To implement and create awareness of our code of conduct NTG rolls out and maintains online training. NTG's online training is designed to support its employees' understanding of the risks that lie within their everyday job roles. Upon employment, new employees must familiarize themselves with NTG's Code of Conduct for employees and participate in various training sessions in relations to our operational systems. In 2022, reporting on participation levels has improved by ensuring participation overview reports per company.

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 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 which set out the requirements which NTG specifies for all its suppliers, including our expectations regarding human rights. Monitoring of compliance with the Code of Conduct by our suppliers takes place through spot checks and audits of our suppliers and through our internal bi-annual risk assessment.

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. In addition, due to the current sanctions landscape, new due diligence procedures and restrictions were introduced to ensure compliance with international trade restrictions.

Risk Assessment

NTG has rolled out a bi-annual legal compliance risk assessment where an automated legal compliance risk assessment questionnaire is sent to all managing directors of NTG entities. The risk assessment ensures continued focus on high-risk entities and high-risk legal compliance areas.

Further Steps

In addition to implementation of standard mitigating measures, there will in 2023 be increased focus on sanctions compliance and due diligence of NTG's supply chain in accordance with the requirements of

the EU Mobility package and the upcoming new requirements under the Corporate Sustainability Due Diligence Directive.
