

## 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 6 August 2024.

### 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 2023 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 and Sustainable Development Goals

NTG's sustainability strategy is based on our accession to the United Nations Global Compact to support the ten universal principles on human and labour rights, environment, and anti-corruption and we acknowledge our role in achieving the Sustainable Development Goals.

### Our Policies on Modern Slavery and Human Trafficking

NTG is committed to complying with all applicable laws and regulations that govern our business activities. As a publicly listed company operating in different countries, we face various legal and regulatory challenges. Moreover, our reliance on independent carriers exposes us to both internal and external compliance risks.

To address these challenges and risks, we have developed a Legal Compliance Program that covers the areas of anti-corruption, foreign trade controls, competition laws, and data privacy. The program aims to prevent, detect and remedy any potential violations of these laws. As NTG is a growing company, and to ensure we are up to date with the ever-changing regulatory

landscape, Group Legal increased the number of employees with legal compliance responsibilities.

## **NTG's Code of Conduct outlines its core values**

NTG's Code of Conduct guides us in making ethical and responsible decisions in our daily work. It reflects our respect for human rights and labour standards, our commitment to sustainable supplier relationships, our zero-tolerance for corruption, and our environmental responsibility. The Code of Conduct defines our expectations and obligations and refers to the relevant internal legal compliance policies.

## **Whistleblower System**

NTG has a group-wide whistleblower system which enables employees and suppliers to report wrongdoings or suspected wrongdoings and violations of law, including the violation of human rights via a confidential channel. The principles and procedure of NTG's whistleblower system is laid down in a policy. Additional information, for example a whistleblower FAQ and information posters 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 2023, 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 to appoint 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.

## Preparing for EU's Corporate Sustainability Reporting Directive

NTG has mapped its most important stakeholders based on a fundamental understanding of our business model and activities and our upstream and downstream value chains. We have collected input from the relevant stakeholders with most insight and investigated if all necessary input could be obtained. The objective of our stakeholder engagement analysis has been to understand how they may be impacted by NTG and to get input and feedback on material sustainability matters. Further, qualitative and quantitative stakeholder input helped us in scoping our next step of assessing impacts, risks, and opportunities in order to prepare for reporting sustainability matters.

## Further Steps

In addition to implementation of standard mitigating measures, in 2024 there will be increased focus on sanctions compliance and due diligence of NTG's supply chain in accordance with the new requirements under the Corporate Sustainability Due Diligence Directive.

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