



## Modern slavery and human trafficking statement

### Introduction

The Modern Slavery Act 2015 ("MSA") is an Act of Parliament, which is designed to tackle slavery in the UK and consolidate previous offences relating to human trafficking and slavery. The Inchcape Shipping Services Group ("Inchcape") strongly supports the MSA and is committed to improving our practices to combat modern slavery in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking.

### Organisation's structure

Inchcape is a leading provider of port agency and **marine services**. ISS has offices in **60** countries and employs over **3,000** people.

### Our policies to combat slavery and human trafficking

We make sure that all our employees have access to our Code of Business Conduct & Ethics and Policy on Anti-Slavery and Trafficking. Inchcape's employment policies and processes ensure that all employees have the appropriate rights to work which reduces the risk of directly employing forced labour or those who may be subject to human trafficking.

To protect whistle-blowers, we have a Whistle-blower and Anti-Retaliation Policy, and reports can be made via our Whistle-blower Reporting Solution Weblink. The Solution allows employees to report issues through a weblink or local number. These reporting lines are available 24 hours a day, seven days a week and reports can be made anonymously, to encourage employees to raise any concerns with complete confidence.

### Risk Assessment

Inchcape have assessed the risk of contributing to Modern Slavery and Human Trafficking and the nature of our work, particularly in developing countries, means we recognise that some of our supply chains operate in high-risk environments for modern slavery including countries with high levels of poverty, a lack of awareness and understanding of human trafficking and modern slavery and weak systems to monitor and respond to incidences of modern slavery.

We have prioritised understanding our risks with respect to direct suppliers and have a greater degree of influence with these suppliers. We recognise, however, that we also need to understand our modern slavery risks across the various tiers of the chain. We vet suppliers and sub-agents to ensure that they are committed to ethical labour practices and every supplier/sub-agent signs our Code of Conduct For Suppliers and Agents which include anti-slavery and anti-human trafficking provisions.

In consideration of the general employment laws, human rights, and the MSA, the compliance and risk management processes have been reviewed. This determines what extent measures already exist and what further measures may be required to prevent slavery and human trafficking taking place in any part of the business or in its supply chains. The processes are evolving and being updated to take account of the use of forced, compulsory or trafficking labour, or anyone held in slavery or servitude, whether adults or children. Inchcape is committed to ensuring transparency in our businesses and our approach to tackling modern slavery.

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## **Procedure to prevent slavery and human trafficking**

We are committed to addressing the modern slavery risks in our operations and supply chains. As part of our compliance with the policies referred to above, we already take the following steps:

- Assess potential risk areas in our supply chains;
- Use Inchcape contract terms where possible, which require third party vendors to comply with the Inchcape Code of Conduct and Ethics.
- Founding member of the IMPA Act (International Marine Purchasing Association's programme for Responsible Business Conduct) to create transparency and compliance with the MSA.
- Mandatory Code of Conduct policy for third party vendors and partner agents to assess for risk and mitigate Modern Slavery.

The Board of Directors and the senior management have overall responsibility for ensuring that our compliance policies are adequate and adhered to in all our areas of activity.

## **Training on modern slavery and trafficking**

All of Inchcape's employees complete mandatory training on our Code of Business Conduct & Ethics and Policy on Anti-Slavery and Trafficking when they join the company.

## **Inchcape's ongoing commitment to eradicating slavery and human trafficking**

We will continue to review our processes to make sure we operate free from slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year end December 2023.

The Board of Directors of Inchcape approved this statement for Inchcape on 26 June 2024.

**Philippe Richard Maezelle**

**CEO and Director**

**Inchcape Shipping Services Holdings Limited**