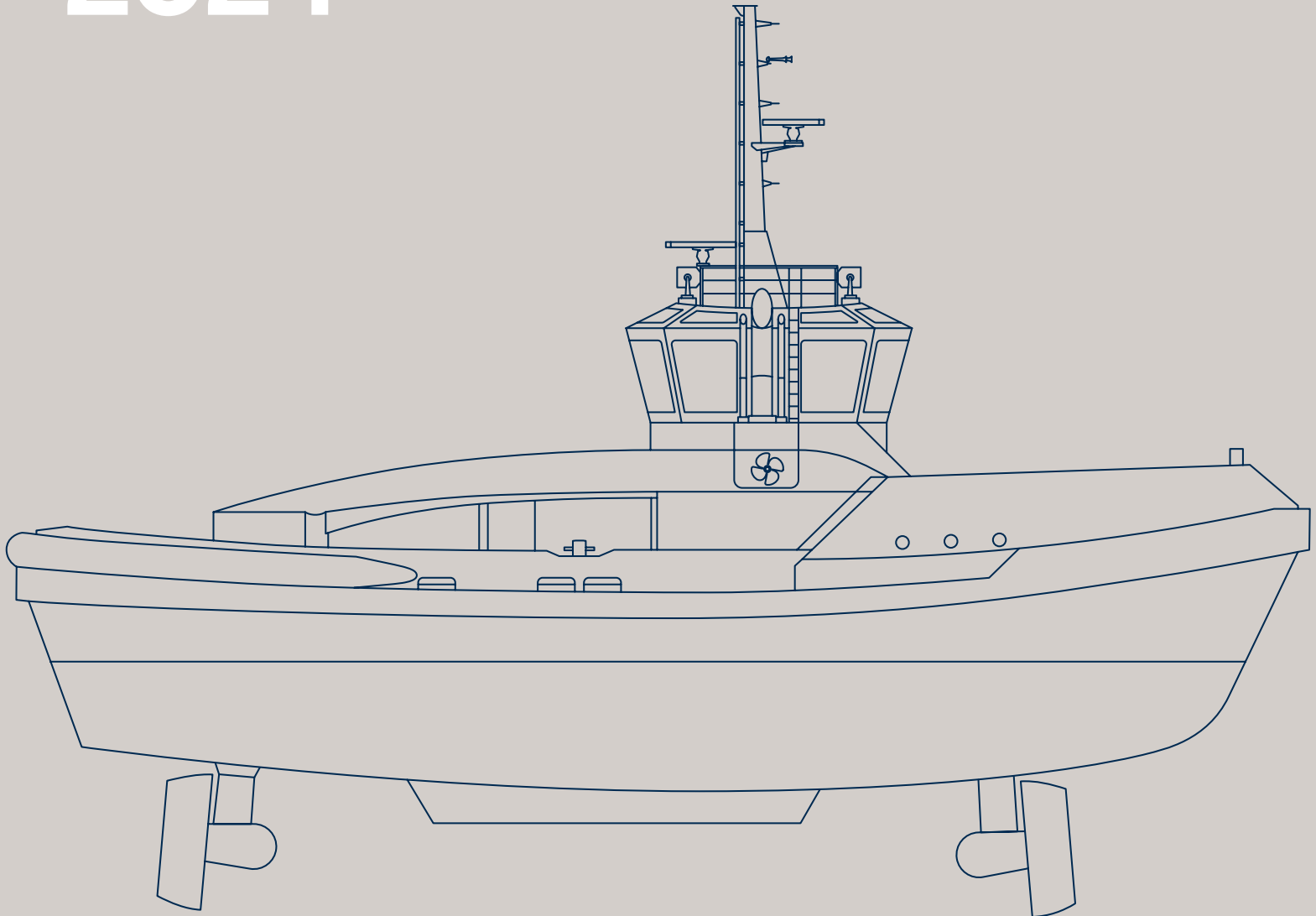


SVITZER

Svitzer Australia Pty Ltd
Svitzer Terminals Australia Pty Limited

Modern Slavery Statement 2024





Who We Are

Svitzer Australia Pty Ltd ABN 86 000 045 009 and Svitzer Terminals Australia Pty Limited ABN 43 077 751 065 (collectively referred to as **Svitzer Australia**) are Australian subsidiaries of Svitzer Group A/S (**Svitzer Group**), a leading global port and terminal infrastructure provider, serving approximately 2,000 customers in 141 ports across 37 countries. Globally, Svitzer Group employs over 4,000 staff, and approximately 75% of those staff are seafarers with the remainder working onshore. In Australia, Svitzer provides a crucial link in Australia's supply chain operations. As the largest private domestic employer of seafarers, Svitzer Australia employs more than 1,000 staff and operates around 100 vessels across Australia and Papua New Guinea.

This Modern Slavery Statement (**Statement**) provides an overview of Svitzer Australia's policies and due diligence processes aimed at reducing the risk of modern slavery practices and implementing effective controls in Svitzer Australia's business operations. It demonstrates Svitzer Australia's zero-tolerance approach to modern slavery and affirms our commitment to

operate in a socially responsible and ethical manner.

This Statement is made in accordance with the requirements under the *Modern Slavery Act 2018 (Cth)* (**Act**), and in conjunction with several other policies governing domestic and global business practices, including the *UN Guiding Principles on Business and Human Rights* (**UN Guiding Principles**).

Our Business

Svitzer Group was previously a part of Maersk, one of the world's largest shipping and logistics companies. As part of Maersk, Svitzer had a longstanding history of implementing practices aimed at eradicating modern slavery in the seafaring industry. Svitzer Group demerged from Maersk in April 2024 and is now an independent company owned by A. P. Møller Holding A/S.

Svitzer Australia services 28 ports across Australia and Papua New Guinea. Our business is centred around tugboat operations, assisting large seaborne vessels to maneuver in and out of ports and terminals to berth and unberth. We also provide vessels, ports and terminals with a range of related marine services, including:

- Pilot and crew transfer services
- line handling
- firefighting
- emergency response
- maintenance.

While Svitzer Australia's core operations are towage services, and this only forms a small portion of a broader supply chain that is the global movement of goods, we have mapped a single value chain that spans our activities from 'upstream' to 'downstream' operations.

We recognize that our industry, including both upstream and downstream value chains, employs a broad range of individuals across several industries and in various countries. As our business continues to expand, there will be greater exposure to sustainability-related risks, opportunities, and responsibilities, including modern slavery risks. Our commitment is to identify these risks and reduce their prevalence where we can

The main activities in our value chain are illustrated below:



Identifying Modern Slavery Risks

In 2021, Maersk conducted a corporate-wide human rights assessment, which included assessing the impact of Svitzer Australia's business operations in Australia and Papua New Guinea. Conducted in conjunction with external experts, and in line with the UN Guiding Principles methodology, the purpose of the assessment was to identify the most salient human rights impacts across the business and to determine whether there were any gaps in our mitigating activities.

The assessment identified that the business as a whole, including Svitzer Australia, had the following salient human rights risks:

- violence and harassment at work
- access to remedies
- working conditions in the supply chain
- health and safety in the supply chain
- emerging risk on impacts of climate change and decarbonization.

In conjunction with the 2021 assessment, Svitzer Group conducted a Double Materiality Assessment in 2024, aimed at identifying various environmental, social and governance issues in our business and to effectively allocate resources to address these problems. Some of the issues identified by the 2024 assessment include:

- less favourable employment conditions for temporary workers.
- impacts of overtime.
- vulnerable groups experiencing unequal treatment.

- harassment and abuse - vulnerable groups (i.e. migrant workers and LGBTQ+ individuals) faced increased risk of abuse.
- health and safety risks experienced both by Svitzer Group employees and in the value chain.
- employee wellbeing and security (especially to those value chain employees in regions where Svitzer Group operates where protection and labour rights lacks or is non-existent).

These assessments are part of a broader and continued effort by Svitzer to identify the risk of modern slavery practices in its business operations and supply chains, each of which are discussed further below.



Modern Slavery Risks in our Business

Both assessments show that our core business has a generally low risk of modern slavery. The standardized working conditions we directly implement for our employees in Australia and Papua New Guinea (i.e. wage rates, benefits and hours) limit the risk of modern slavery practices. Furthermore, the human rights assessment concluded that the risk of modern slavery is very low for seafarers.

In saying this, we understand that the assessments have highlighted areas which require additional work and focus. While we strive to implement favourable working conditions, we recognize non-employees may experience employment conditions which are below standard, especially in countries with weaker legislative and contractual protections. We are committed to ensuring working hours align with national legislation, ensuring the physical and psychological health for our employees.

The assessments also indicated that vulnerable members of our staff may experience abuse and

harassment at much greater rates compared to other non-vulnerable individuals. This is exacerbated in regions which lack legal protections. Our focus is to continue to educate our staff in order to increase diversity awareness, reduce the risk of harassment, and to provide additional support to staff where required.

As some of Svitzer Australia's Australian operations extends into Papua New Guinea, a region which typically lacks employee protection compared to a country like Australia, our focus is on ensuring our resident staff have access to resources and protections which facilitate their wellbeing. Whilst Svitzer PNG Limited (**Svitzer PNG**) is not a reporting entity under the Act, all policies covering Svitzer Group applies to Svitzer PNG. Svitzer PNG provides on-site accommodation for workers which complies with the Maritime Labour Convention (**MLC**). Svitzer PNG is not a party to the ITF Standard Collective Agreement 2022/23 but ensures its employees are better off overall under their employment contracts.



Modern Slavery Risks Within our Supply Chain

The assessments indicate that greater risks of modern slavery are present in our value chain. As a global operator that operates and procures services in different regions, there is an increased risk of labour rights violations. 70% of our suppliers are local Australian entities, although some may have overseas ownership. Of the remaining 30%, the suppliers are mainly based in China, Singapore, PNG and Europe. In some of these locations, workers in the upstream value chain may be at a higher risk in terms of instability, lack of benefits, wage insecurity and vulnerability to exploitation. Our assessments showed that areas of vulnerability in our operations include the use of migrant workers, contracted labour and manning agencies, especially in regions which lack general employee protections. We have consequently identified 12 high risk supplier categories, which have since been prioritised for enhanced supplier due diligence.

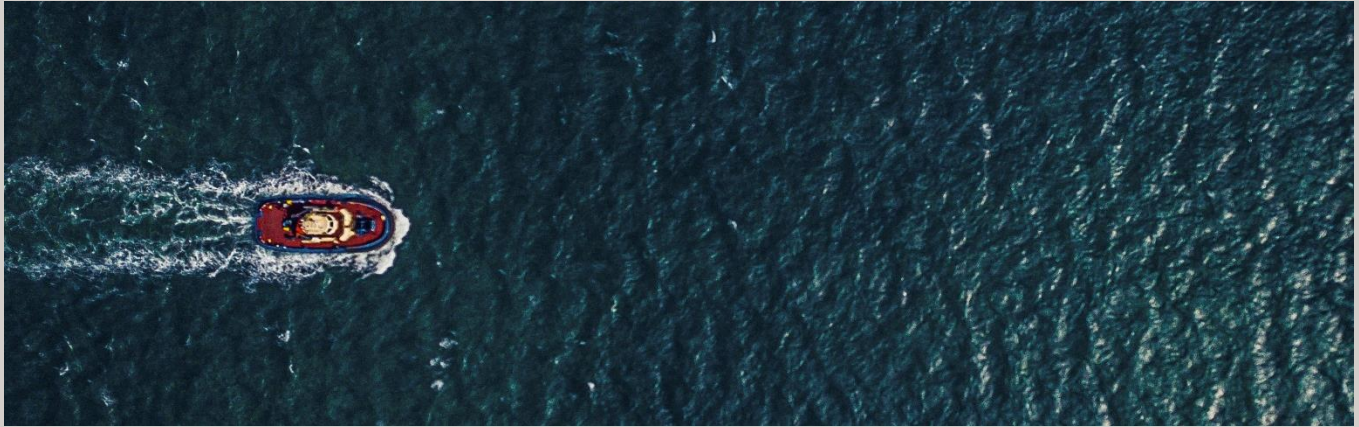
In April 2024, Svitzer formalised its Sustainable Procurement Policy. In accordance with this policy, we are committed to integrating ethical, social, and environmental standards into our procurement processes. This commitment extends to our supply chains and the communities where we operate, ensuring alignment with the principles endorsed in the UN Global Compact. The policy emphasizes the importance of upholding fair labour practices, ensuring safe working conditions, and promoting diversity and inclusion (social responsibility), as well as reducing carbon footprint, promoting resource efficiency, and supporting the use of sustainable materials (environmental responsibility). It also encourages local sourcing, support for small and medium enterprises, and cost-effectiveness (economic responsibility).

Svitzer also commits to continuous improvement by regularly reviewing and updating its procurement practices to meet evolving sustainability standards and stakeholder expectations.



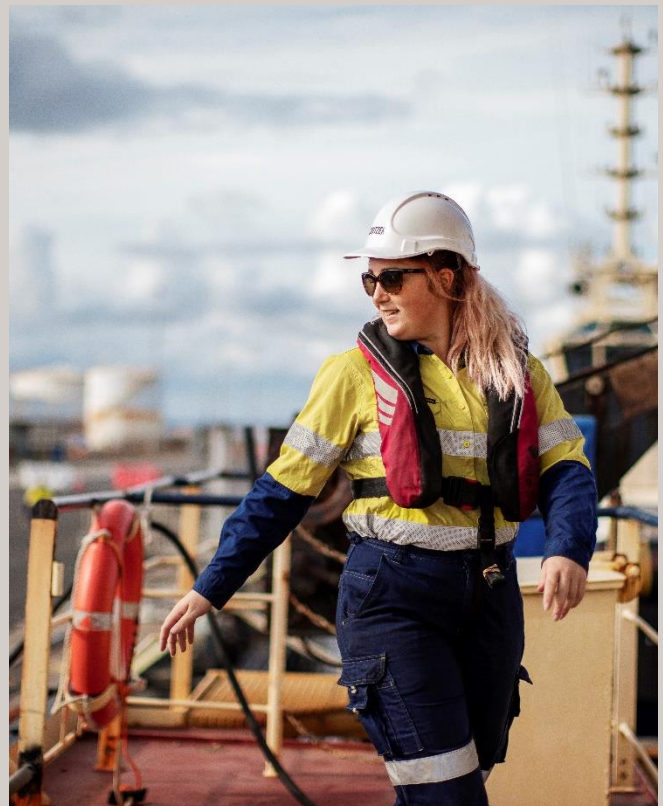
Managing Modern Slavery Risks

Svitzer Australia remains focused on ensuring appropriate working conditions, secure employment opportunities, suitable working hours and an inclusive workplace for all of its employees. We are committed to conducting business in a socially responsible way which recognises and upholds human rights, in line with global frameworks, including the UN Guiding Principles. Svitzer Australia implements several group-wide policies which provide mechanisms for identifying human rights breaches and modern slavery risks in our business and ways in which these fundamental issues are addressed.



Human Rights Statement

Svitzer Group formalised its Human Rights Statement in April 2024. In accordance with the Statement, we undertake to work diligently to prevent adverse impacts on individuals, whether within the company, our supply chains or in the communities where we operate, and to uphold the principles endorsed in the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises. Our Statement also records our commitment to respect all internationally recognized human rights referenced in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights to Work. These rights include core labour rights, such as the rights of freedom of association and collective bargaining, the rights to not be subjected to forced labour, child labour or discrimination in respect of employment and occupation, and standards on working hours and the safety and health of all workers.





Svitzer Code of Conduct

Based on international frameworks, our Code of Conduct contains standards for behaviour and engagement, and governs how Svitzer Australia interacts with customers, authorities, colleagues, suppliers, the community and other stakeholders. It includes provisions for secure employment and appropriate working hours, in accordance with local laws and emphasises that freedom of association, social dialogue, and collective bargaining are key for a secure work environment. The Code of Conduct also reiterates our commitment to human rights and our commitment to avoid modern slavery across our business.

Supplier Code of Conduct (SCOC)

The Svitzer Supplier Code of Conduct (**SCOC**) aligns with the United Nations' Universal Declaration of Human Rights, ISO standards on Health, Safety, and Environment, and the core labour conventions of the International Labour Organisation (ILO). It outlines the expected business conduct of our suppliers and sets minimum requirements for our suppliers to operate in accordance with responsible business principles detailed in the SCOC. Where standards differ in the SCOC from local and national laws as well as international standards,

we press our suppliers to apply stricter standards and be able to demonstrate compliance with all international legislation that applies to your business operation. Where this occurs, we encourage our suppliers to address such conflicts to us in order to jointly establish the most appropriate course of action. Furthermore, our suppliers are also required to implement the principles and standards of this SCOC, or similar internationally recognised standards, with their own business partners.

Svitzer's Global Whistleblower System

We remain vigilant in recognizing and addressing instances where modern slavery practices and human rights breaches occur in our operations and via our business relationships. The Svitzer Whistleblower System is a confidential channel through which allegations can be reported by any person within the Svitzer Group or outside our organization. Available in more than 75 languages, it enables people to report concerns safely on all human rights issues, including human trafficking and forced or involuntary labour, child labour, and actions harming persons, their livelihood or properties, related to our operations, suppliers, contractors, third-party agents, and other business partners with a direct link to Svitzer.



Diversity and Inclusion Policy

Our Diversity and Inclusion Policy reflects our commitment to support diversity in the workplace. The policy aims to increase the awareness for inclusiveness in our business and our business partners and reduce the prevalence of workplace harassment and abuse to minorities. Through the policy, we invest in activities and communication to create awareness and encourage dialogues about key diversity and inclusion topics and support all-employee driven taskforces and events that contribute to diversity and inclusion.

Employee Relations Policy

The Employee Relations Policy emphasises our commitment to provide good and fair employee conditions for our employees and to ensure their welfare. This policy sets out the responsibilities in relation to implementing such conditions, i.e., in relation to:

- Health, safety and security
- Equal opportunity and diversity
- Child labour
- Freely chosen employment
- Freedom of association and the right to collective bargaining.



Due Diligence Actions in Accordance with these Policies

Svitzer Australia actively implements actions in line with the above policies aimed at identifying where modern slavery practices and human rights breaches occur in its business and the broader value chain, and ways in which it can address these issues.

Svitzer Australia engages with our employees and partners regularly and take actions throughout the year to improve conditions for members of our broader workforce. To inform these actions, Svitzer undertakes employee engagement surveys for all employees at least annually. The results of these surveys, complemented by other quantitative data, allows Svitzer Australia to gain actionable insights and identify unfavorable employee conditions which may be linked to modern slavery breaches.

Svitzer Australia also actively engages with employee representatives and recruitment agencies to better understand the challenges of our employees, particularly in the international seafaring industry. These connections, which also includes engagement with local unions and global union associations, allows us to identify the key labour issues, and the regions where unfavourable practices are predominantly occurring, and allows us to implement changes accordingly.

Our Code of Conduct requires employees to participate in mandatory training, providing education and resources on a variety of issues, including bullying, harassment and modern slavery awareness. In 2024, Svitzer rolled out a Code of Conduct refresher training for all employees to remind and re-educate staff of our policies and commitments, including in relation to modern slavery and human rights.

In 2024, we rolled out a training program in Australia compliant with the new Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022 (Cth) which covers code of conduct, sexual harassment, discrimination, EEO and modern slavery. The training has been completed by 55% of Australia and PNG shore employees.

As of 2024, Svitzer Australia require all new suppliers to acknowledge the SCOC during onboarding. We regularly review and monitor supplier commitments during registration and contract renewals and take corrective action with non-compliant suppliers to ensure commitment. Where high-risk suppliers are identified, Svitzer Australia completes Sustainable Procurement Assessments, in accordance with our internal guidelines.

We are continuing to bring awareness to our Whistleblower System, both internally and to our broader non-employees and agents in our value chain, where individuals can anonymously report modern slavery practices. This includes additional campaigns around the year to bring awareness to the Whistleblower System, such as the 'SpeakUp' campaign and by notifying workers of the availability of the Whistleblower hotline on both internal and external Svitzer Australia sites. In addition to this, Svitzer Australia are regularly assessing our human rights impacts and continue to make changes to our policies accordingly.

Assessing Our Effectiveness

In both regional and Australian procurement, we work in close collaboration with Svitzer Group Sustainable Procurement to implement, execute, and monitor the initiatives outlined in our Sustainable Procurement

Strategy. This partnership enables us to embed sustainable practices across our procurement processes, align with strategic objectives, and drive continuous improvement.

We assess the effectiveness of these efforts through several mechanisms, including:

- Establishing a regular review process to monitor progress against our goals
- Facilitating ongoing engagement and feedback between key areas within the Svitzer Group and Svitzer Australia
- Ensuring our risk assessment processes remain current and robust
- Conducting internal audits to verify compliance and identify areas for improvement; and
- Partnering with industry groups and external auditors to benchmark and enhance our performance.

These actions help ensure that sustainability is not only embedded but continuously strengthened across our procurement practices.

Consultation

This section does not apply. Svitzer Australia does not own or control any subsidiaries or related entities.

This statement was approved by the Board of Directors of the reporting entities:

Svitzer Australia Pty Ltd

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Videline Georgieva

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Videline Georgieva, Director

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Michael Hill

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Michael Hill, Director

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Date: 15 June 2025 | 23:23:23 PDT

Michael Hill, Director