



The Den Hartogh Group statement is reviewed annually in line with the requirements of the legislation.

The following document represents the Den Hartogh Group statement covering the Modern Slavery Act and Anti-people trafficking legislation. As required in the Act Part 6.

This document was agreed and approved by a member of the Board of Directors of Den Hartogh.

Name	K P den Hartogh
Date	11 th October 2024
Signature	

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The May 2024, review of this document was instigated & carried out by appropriate department representatives following current legislation and GOV guidance.

1. Statement.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty, by another, in order to exploit them for personal or commercial gain.

We, as Den Hartogh Logistics, have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (UK).

We expect the same standards from all of our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.



The original Den Hartogh Modern Slavery Act document was implemented in 2017. It is reviewed during the annual management review process. In the review of Year 2023/24, in May 2024, it was agreed to update the document in line with the latest revision of the applicable legislation. This document is the latest review and statement.

2. Structure, Business and Supply Chain.

2.1. Sector Den Hartogh Operate in.

Den Hartogh are one of the world's leading Logistics Service Providers for the safe and reliable transport of bulk products for the Chemical Industry.

Den Hartogh operates containers for the carriage of solids, liquids, and gases via multi modal supply chains across the globe, see section 2.5. Den Hartogh provides the service for such operations along with Logistics Management Services, and On-Site Logistics Services.

Den Hartogh have operated as an organisation for over 103 years with a huge experience of delivering logistics solutions for the chemical and petrochemical industries.

Den Hartogh is the specialist in road and intermodal transport of bulk liquid, bulk solid and gas products for the chemical industry.

The Group is split into four Business Units, see section 2.3, the below is a summary of the operating sector of these Business Units.

In March 2024 Den Hartogh purchased the organisation H&S Group, a leader in the transportation of liquid foodstuffs in Europe. This was ratified by the Dutch authorities in Q3 2024. These will be integrated into this document in Q4-2024.

2.2. Liquid Logistics.

Den Hartogh is specialised in transporting and storing liquid chemicals. For transportation, Den Hartogh Liquid Logistics use large single or multi-compartment bulk-liquid containers and road barrels that provide maximum carrying capacity for every shipment. Den Hartogh Liquid Logistics are employed in the transport of "products" classified as dangerous goods and non-dangerous goods, across all sections of the "chemical industry". The Liquid Logistics business unit is predominantly operating within the European land mass.

2.3. Gas Logistics.

The Business Unit Gas is specialised in the transportation of Air, Chemical and Liquefied Natural gases.

The air gases include liquids nitrogen, liquid oxygen, liquid argon, hydrogen, carbon dioxide and helium.

Chemical gases include hydrocarbon gases such as propane, butane, isobutene, liquid petroleum gas, and propellants. Den Hartogh Gas Logistics are engaged in the transport of a small number of refrigerants, as well as ammonia. This is a global supply chain business.

2.4. Global Logistics.

The Den Hartogh Global Logistics business unit utilises large single or multi-compartment bulk-liquid containers for the movement of liquids products. This is a multi-modal operation across the globe.



Den Hartogh Global Logistics are employed in the transport of “products” classified as dangerous goods and non-dangerous goods, across all sections of the “chemical industry”. This business unit operates on intercontinental as well as inter-regional supply chains across the globe.

2.5. Dry Bulk Logistics.

This Den Hartogh Dry Bulk Logistics business unit transport free flowing bulk solid products in either our 'Bag-in-Box' solution, ALU Box, or to a less extent the pressure discharge tank (PDT); an intermodal tank container designed for the carriage of solids. Alongside this the business unit provides a number of on-site logistics solutions including storage and handling. This Dry Bulk business unit includes the LinerTech organisations.

The entity “InBulk” operates under the Group Den Hartogh Group structure as a separate entity. This business unit operates across a number of sectors including the chemical and the food industry. The main products transported are “solid polymers” used as the feed stock for other industry sectors.

Den Hartogh Dry Bulk Logistics covers activity in UK, Europe, and part of Asia; it potentially can operate across all global territories.

2.6. Seasonal Performance.

Through examination of the order details and data, for each of our business units, there is no seasonality to the Den Hartogh group business per se. That is, there are not specific peaks and troughs associated with significant shifts in the supply chain with respect to resources and work undertaken by the supplier base in the calendar year.

2.7. Group Structure and Relationships.

The Den Hartogh group is headquartered in Rotterdam, The Netherlands.

Den Hartogh group operates from a number of countries around the globe. See section 2.4.1.

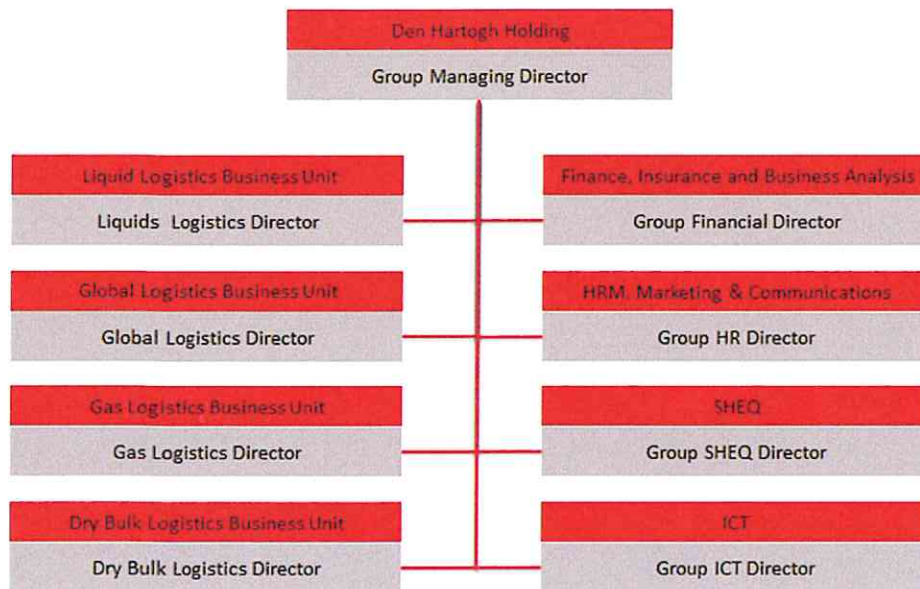
The organisation has in the region of 2,200 employees.

The Board of Directors is built up as follows.

Pieter den Hartogh	Group Managing Director
Bram Paape	Group Financial Director
Joep Aerts	Liquid Logistics Director
Mark Warner	Global Logistics Director

The financial structure of the organisation is based on the operating countries. E.g. the individual's country registration for delivery of goods and services within that country. The organogram for this structure is complex and maybe made available upon request.

The business units as discussed in section 2.1 are managed within the following structure. Each Business unit has its own management team for the implementation of “strategy” at the business unit level.



2.8. Countries Goods & Services.

2.8.1. Countries

As stated, Den Hartogh group operate in the following countries as own Den Hartogh activity, location, and operation.

Location	Country	Location	Country	Location	Country
Zelee	Belgium	Le Havre	France	Chiasso	Switzerland
Antwerp	Belgium	Budapest	Hungary		
Carrington	England	Mortara	Italy	Rio de Janeiro	Brazil
Hull	England	Offanengo	Italy	Shanghai	China
Immingham	England	Coevorden	Netherlands	Klang	Malaysia
Stockton	England	Rozenberg	Netherlands	St Petersburg	Russia
Wilton	England	Rotterdam	Netherlands	Singapore	Singapore
Grangemouth	Scotland	Terneuzen	Netherlands	Seoul	South Korea
Porvoo	Finland	Warszawa/Zabrze	Poland	Bangkok	Thailand
Turku	Finland	Brasov	Romania	Istanbul	Turkey
Duisburg	Germany	Granollers	Spain	Dubai	UAE
Worms	Germany	Gothenburg	Sweden	Houston	USA

For activities through Asia, South America, Mediterranean, Canada, Africa plus other specific countries; Den Hartogh group utilise a Network Partner (Agent) network. Here specific operating Agreements are in place. These are managed by the Regional Director / General Manager for the region, in which the Agent is tasked to operate.

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2.8.2. Services.

For transport, Den Hartogh makes use of our own fleet of approximately 30,000 liquid, gas, and dry bulk containers, 550 trucks and 400 road barrels.

The following are the services provided **by** Den Hartogh directly.

Tank containers Road Barrels 30ft & 20ft Dry Boxes Alu Boxes Pressure tanks	Trucks Chassis	Drivers (Europe) Operatives (on site) Office Staff Other Staff	Workshop & Repair activity.
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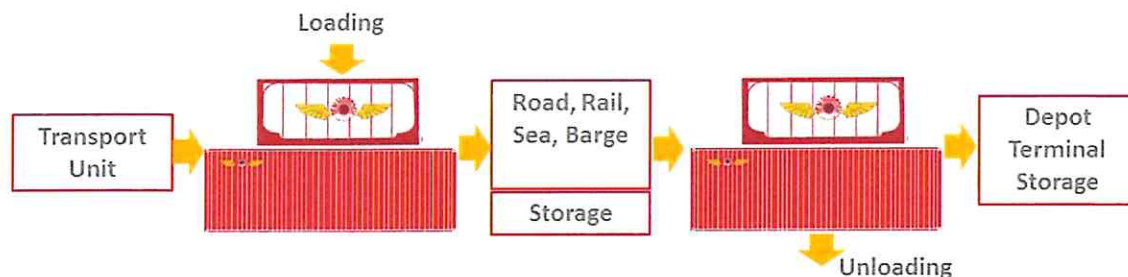
The following are a list of services provided **via** external 3rd party suppliers.

Rail carriage Vessel (Sea & barge) provision.	Trucks Chassis	Drivers Other Staff Network Partners (Agents)	Workshop & Repair activity. Cleaning facilities. Liner provision
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All suppliers go through an approval process managed by the General Manager and the Regional Procurement management.

2.9. The Supply Chain.

The basic model of the business is as follows.



The transport unit is as listed above, Tank container, road barrel or box container. There is a mixture of own, leased, and managed equipment in the supply chain.

The supply chain is undertaken on behalf of a “customer”. The terms of activity are directed by the INCO Terms of the sales and services. Not all customers of Den Hartogh are bound by a term contract. Not all 3rd party suppliers are bound by a formal contract. The parties in activity with Den Hartogh, these services will be carried out based on the agreed Terms & Conditions.

2.10. Business operating model.

Orders for carriage of goods and the provision of services are received through contract, spot and 3rd party clearing house. The execution of these orders is through own direct and external 3rd party resources. All suppliers go through a form of approval before use.

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Trucking provision from 3rd party is by direct agreement. The trucker cannot sub-contract this work unless specifically agreed.

Vessels including barge are dictated by the parties operating on the routes required. The procurement team oversee the selection of the shipping line based on routes, performance, and costs. The party to whom the booking is made may not be the actual operator of the vessel or the direct employers of the crew. This also links with the port staff employed to move the container between truck, port side or vessel.

Rail service providers are dictated by the parties operating on the routes required. The procurement team oversee the selection of the rail service company based on routes, performance, and costs. The party to whom the booking is made may not be the actual operator of the train or the direct employers of the rail staff. This rail booking may also not link with the rail head staff employed to move the container between truck, rail side or train.

2.11. Business Relationships.

2.11.1. Suppliers.

As stated, Den Hartogh group operate a number of different suppliers to the businesses. These suppliers provide a range of goods or services. These are under some form of TnC's for the activity. Where contracts are in place these are managed by the Den Hartogh contract owner and subject to the country law of jurisdiction as reflected by the agreed terms of the contract.

A specific supplier Code of Conduct was put in place in 2023 for use with all new suppliers as well as retrospective incumbent suppliers.

In Q4 2023, there was the implementation of a new tool "Supplier Relationship Management" (SRM tool). All documentation will be captured within this system including correspondence related to MSA and associated subjects. The SRM tool is being implemented to the different business units, regions, and supplier services as a cascade across the total group.

2.11.2. Trade Unions.

Den Hartogh follows the (regional) national laws of the country it is operating in with regards to the position of a formal trade union agreement being in place and representing the work force.

2.11.3. Works Council or other similar bodies.

Den Hartogh group follows the (regional) national laws of the country it is operating in.

If these allow and the local structure requires / request the formation of a "works council, staff representation or such structure" then this is allowed and encouraged.

Alongside any formal structure locations are encouraged to operate meetings centred on local HSE issues and concerns.

3. Other Policies in the Organisation.

As a business we recognise our responsibility to be aware of the risks of Modern Slavery within our own organisation and supply chain. We therefore have the following policies:



3.1. Whistleblowing Policy

Den Hartogh group encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The UK organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

In May 2024 the Code of Conduct was revised and a more detail section covering the "Speak Up Process", the Den Hartogh Whistleblowing policy, has been included.

3.2. Code of Conduct

Den Hartogh groups' code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating 'locally', within region and across the globe when managing its supply chain.

3.3. Corporate Social Responsibility Policy

We aim to support and respect the protection of internationally proclaimed human rights.

3.4. Business Ethics Policy

The group policies are collected together in a framework called the Business Ethics Policies. This is a web-based document, available through the Group webpage. The group of policies making the Business Ethics Policies were reviewed and released in December 2022. These are made available to the Company and the public through the Company website.

<https://www.denhartogh.com/about-den-hartogh/business-ethics/business-ethics>

These are reviewed annually with updates, re-release and re-issue as required and directed.

3.5 Recruitment Policy

We have a robust recruitment process, in line with relevant employment laws, to safeguard against modern slavery, human trafficking or forced labour. Our recruitment policy protects any current and potential employees from unfair treatment and promotes a fair and inclusive workplace. The policy complies fully with all applicable legislation and ensures that all employees have a legal right to work in the relevant country. All colleagues have employment contracts and/or other agreements in place which are regularly reviewed in line with employment law and best practice. In addition, all our employment agencies are thoroughly vetted to ensure compliance with temporary labour relations and employment status.

4. Due Diligence.

4.1. Actions taken to understand business operation.

Representatives from each of the business units and departments met to identify the supply chain process and the various suppliers and locations involved.



4.2. Risk Management Processes

As part of the ongoing strategy, Den Hartogh is in the process of developing “Risk Registers” in the business. The goal of the “Risk Registers” is to identify and quantify potential risks to the business and ensure that sufficient actions are taken to mitigate. Alongside the Risk Registers, there will be procedures to outline roles and responsibilities, along with action plans which are to be reviewed quarterly by the respective management teams.

4.3. Action plans and priorities

This MSA document is overseen by the People & Culture & SHEQ Teams. Under the SHEQ Management Review process this document will be reviewed. As required the SHEQ Team will work with the People & Culture Team and representatives from within the organisation to develop projects and initiatives as required. These will then be captured in Departmental One Page Strategy of the Group SHE OPS, all Business Units One Page Strategies, and the organisations SPECE maps, as required.

The individual Business Units will operate their own internal and external audit program, including the audit of service provider e.g. Suppliers. These audits will be captured in the current system and then as part of SRM tool.

4.4. Stakeholder engagement

We have trained a core group of managers on the Modern Slavery Act. Forming a *virtual* project group to lead on the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. This project group will be enacted as required by the direction set within 4.3 above. The core managers will receive update and refresher training as required and appropriate.

Information will be cascaded to all stakeholders via newsletters and other appropriate means.

4.5. Supplier & Service providers.

Working with the procurement team, the *terms and conditions* have been written to reflect the need for our suppliers and service providers to abide by legislation covering; Modern Slavery, bonded labour, child labour and Anti-people trafficking and other similar defined legislation.

These suppliers and service providers are liable, by contract, to both planned and unplanned audits of their activities and facilities.

4.6. Grievance mechanisms to address modern slavery issues.

Den Hartogh have existing systems in place to enable staff to voice any concerns (including Modern Slavery and Anti-people trafficking). Grievance procedures are designed to investigate and deal with any alleged issues raised in an open, fair, and consistent manner.

4.7. Actions to embed zero tolerance in organisation.

Within Den Hartogh group, we ensure that all employees have a legal right to work in the country that they are employed and are paid in line with minimum wage legislation for that country.

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All staff are made aware of this policy through their induction and introduction to the Business Ethics and Code of Conduct as a new starter.

5. Business Risk.

Den Hartogh is committed to ensuring there is no modern-day slavery or human trafficking in our supply chains, or any part of our business. We have therefore initiated a high-level risk assessment to research these areas.

The results of this research identify main areas, stakeholders geographically and modally at highest risk of involvement and/or participation in such activities.

Priority will be applied to areas of highest recorded slavery as published per the Global slavery index. Thereafter we will undertake regular review to ensure ongoing monitoring (of risk areas).

During 2019 there was a review of the security within the Dry Bulk business related to “stowaways” and the dry bulk containers moving between specifically Zeebrugge and UK. Whilst no evidence to suggest this was part of any organised people trafficking, it was *security* and *people risk* in the supply chain. New metal sealing cables were applied to container on this route preventing unauthorised access to the transport units.

6. Effectiveness.

Den Hartogh have implemented the requirements of the Modern Slavery Act 2015. We will, going forwards, set annual targets related to the effectiveness of the controls identified within the group. Den Hartogh will measure the implementation of improvements, as the improved ways of working are identified. These “performance indicators” will be referenced historically in the review of the “Group Statement covering the Modern Slavery and Anti-people trafficking”, which will be undertaken annually, released, and published as required under the UK Legislation, the MSA 1st April to 30th March annually.

7. Training.

We have supplied training to a core group of managers across a cross section of departments within the business units, to raise the profile of the Modern Slavery Act. These managers will be utilised from time to time, to form a project team to identify actions with the aim to ensure the prevention, detection, and reporting of Modern slavery. This work and actions are an integral part of our business process and supply chains. It is the responsibility of all those working for us or within our supply chains to apply as required.

Our code of conduct has been distributed to all our offices, forms part of our online onboarding programme, and is available on our company website.

In 2023, supplementary elements were added to the company code of conduct training. This is now part of the package available for all new starts to the organisation. The additional content was shared to all current staff via release through of training management platform.

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Further training will be identified during the risk assessment process. Once a potential area of vulnerability has been identified, training will be given to reduce the risk, prevent the occurrence, as well as raise the profile of the modern slavery compliance.

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