

Scan Global Logistics Group
Modern Slavery Act Statement 2024



SCAN GLOBAL LOGISTICS GROUP MODERN SLAVERY ACT STATEMENT 2024

At Scan Global Logistics Group ("we", "our", and "us"), we regard human rights as an essential principle that must be upheld at all times. We are committed to maintaining vigilance and staying informed of global developments and regulatory changes, continually strengthening our efforts to combat modern slavery. As we work towards our purpose—to make the world a little less complicated—we are dedicated to advancing our sustainability ambitions and consistently improving our processes to meet the high standards we set for our business.

Beyond reporting on human rights in our group-wide policies, we accept the global responsibility to publish annual Modern Slavery Act Statements for every financial year.

This statement is issued in accordance with section 54(1) of the UK Modern Slavery Act 2015, and covers the parent company Scan Global Logistics A/S including its two UK subsidiaries Horizon International Holdings Limited and Scan Global Logistics (UK) Ltd. The statement is further issued in accordance with part 2, section 14(1) of the Australian Modern Slavery Act 2018, and covers the parent company Scan Global Logistics A/S including its two Australian subsidiaries SGL Australia PTY LTD and Scan Global Logistics PTY LTD. It details the measures we take to ensure that no form of modern slavery exists within our supply chain or anywhere in our organization. It is binding and applies to all individuals working for us or representing us, in any role and in every country.

This statement covers the financial year from 1 January 2024 to 31 December 2024 and has been approved by the Executive Management of the Scan Global Logistics Group on September 18, 2025.

Introduction

We maintain a long-standing commitment to respecting human rights in our business and supply chains while complying with the human rights and labour law regulations. We respect and enforce the principles of the 1998 International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Universal Declarations on Human Rights and other key national and international human rights standards such as the International Bill of Human Rights. We have been a signatory to the United Nations Global Compact since 2015 and support the ten principles covering the four pillars: labour, environment, anti-corruption and human rights. We have a zero-tolerance policy against all forms of modern slavery, forced or compulsory labour and human trafficking and is firmly committed to ensuring the abolition of any such crimes against humanity.

We have signed the World Economic Forum Industry Charter for Humanitarian Supply Chain Resilience and conform to the OECD Guidelines for Multinational Enterprises. We respect every employee's right to favourable working conditions and comply with laws and regulations regarding wages and benefits. One of our four virtues is "respect", so we are firmly committed to treating every person who carry out services for Scan Global Logistics Group with respect and dignity.

Our business organisation and structure

Scan Global Logistics Group is a global freight forwarder and logistics provider, with a workforce of approx. +4,500 employees in +55 countries distributed across 190+ offices in EMEA, North America, South America, Sout East Asia and Asia Pacific. SGL Group ApS is the parent company and the acquirer of the Scan Global Logistics Group. We serve over 25,000 customers of which the average tenure among the ten largest is approximately nine years.

Our business/operation includes air, ocean, and land distribution and delivering transport and logistics services to the global industry. We rely on a shared understanding of how we expect all of us to conduct the Scan Global Logistics Group's business and what it means to act responsibly and with integrity. We believe our purpose can be best achieved by bringing a well-founded human approach to everyone anywhere, respecting all human rights and the full equality of all human beings, and promoting good intentions and honesty. We are a leading provider of complex humanitarian logistics solutions for UN agencies and NGO's and provide vital logistics support and mission-critical contingency planning.

Our commitments and policies

Modern slavery takes various forms including servitude, forced and compulsory labour and human trafficking, all of which have the deprivation of a person's liberty for personal or commercial gain in common. We are committed to implementing and enforcing effective controls to ensure that such violations of fundamental human rights do not occur within our organization. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensuring that the prevention, reporting and detection of modern slavery and human trafficking is made the responsibility of all those working for or in the Scan Global Logistics Group and any associated organisations.

As part of our effort to identify and mitigate risk, we aim to integrate sustainability into our procurement and contracting processes by measuring and ensuring compliance with the standards, including but not limited to our Third-Party Code of Conduct. The initiatives are further reflected in our group-wide policies such as our Code of Conduct, Diversity and Inclusion Policy, Health and Safety Policy, Quality Policy, Human Rights Policy, and Anti-Corruption Policy. Each year we conduct reviews of all our policies and adjust them to remain in compliance with any national or international human rights law or regulations.

Supply chains and other stakeholders

We expect all of our suppliers and other business partners to comply with international human rights standards and national laws regarding child and forced labour, working hours, wages and benefits and

non-discrimination. We require our primary suppliers to adhere to our Third-Party Code of Conduct and share this code with their sub-contractors and other associates involved in the business transaction and expect them to adhere to the same principles. For Scan Global Logistics Group, transparency is of utmost importance. Therefore, we highly value sharing information and explaining our expectations for compliance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 for every internal or external stakeholder. Our suppliers are furthermore subject to a system of checklists to evaluate risks and conduct audits.

In addition, we further acknowledge the importance of dialogue. We regularly engage with affected stakeholders including our employees, worker representatives, and suppliers. We conduct interviews with internal stakeholders as part of our human rights saliency assessment and during the double materiality assessment process, and we participate in industry partnerships.

We expect our employees, suppliers, agents, and other stakeholders to build awareness and knowledge of human rights and report any malicious behaviour.

If we find that a business partner is non-compliant with our policies or any other requirements relating to anti-slavery, we will consider such non-compliance as a material breach of contract by the business partner. Any employee who fails to adhere to the provisions of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 may be subject to appropriate disciplinary action and employment-related consequences.

Risk assessment and due diligence

We are committed to continuously improving our procedures to identify and eliminate any form of modern slavery throughout the business. As a global freight forwarder, we further recognise that some of our supply sectors are potentially higher risk due to their geographical place of business. We embrace these risks and conduct further due diligence to understand the potential higher risk of poor labour practices and implement additional activities to mitigate these risks throughout the supply chain.

We prioritize proactively identifying vulnerabilities, such as ethical breaches, environmental impacts, and disruptions, through supplier evaluations and continuous monitoring. Through risk assessments, we aim to anticipate and address issues related to compliance, reputation, and operational continuity before they arise. Our mitigation strategies involve collaborating with suppliers to implement corrective actions, cultivating resilient supplier relationships, and diversifying sourcing options to reduce dependency. Continuous monitoring and regular reviews ensure our ability to adapt to emerging risks, allowing us to uphold our commitment to ethical practices, environmental stewardship, and social responsibility throughout our procurement processes.

In 2023, Scan Global Logistics Group initiated a human rights global saliency assessment to identify potential human rights impacts across our value chain, and had a focus on prioritizing areas that require mitigation to minimize any adverse impacts. As part of this initiative, and to further gauge employee awareness of human rights, we conducted a dedicated human rights survey in the fourth quarter of 2023, targeting a representative segment of our global workforce.

The assessment was finalized in the early 2024, and the findings underscored the importance of being especially vigilant in countries where the risk of human rights issues is higher. While the assessment did not identify any current negative human rights impacts, it did identify a list of salient potential human rights issues which we take very seriously. Most importantly, there is the risk of bad working conditions, due to being present in countries with a higher risk for human rights impact, including those with a minimum wage below living wage, restricted freedom of association rights and where discrimination is not prohibited by national laws. Failure to implement consistent standards and working conditions can lead to higher employee turnover and impact on Scan Global Logistics Group's reputation as an employer. As such, we consider working conditions in higher-risk countries as part of our enterprise risk management approach and have incorporated them into our ERM system. In 2024 we also concluded a Global Benefit Analysis project with external counsels to better understand wages and other benefits, to ensure our employees are subject to fair pay and employment conditions.

Given the current geopolitical climate and our position as a leading forwarder of aid and relief for various UN departments, employees at Scan Global Logistics who support aid and relief operations are exposed to safety risks. Our teams often operate in regions experiencing armed conflict, natural disasters, or unstable political environments, which can create hazardous working conditions. Scan Global Logistics Group are addressing these impacts by implementing its health and safety management system across its operations.

The result of the saliency assessment also showed that while Malaysia, Laos and UAE were identified as high-risk counties of operation for forced labor, that is not considered a significant human rights risk for Scan Global Logistics Group. The assessment further determined that child labour is not a material risk.

Our approach to working conditions is governed by our Code of Conduct, which set clear ethical standards for the company and covers all aspects of its operations and daily work. This is also complemented by our Human Rights Policy, which enshrines our commitment to respect human rights within our sphere of influence and eliminate all forms of modern slavery.

Scan Global Logistics Group regularly conducts assessments of select Tier 1 suppliers using a risk-based approach. These assessments may include on-site audits that evaluate working conditions and safety practices. We require our primary suppliers to sign and share our Third-Party Code of Conduct and ensure it is shared with their subcontractors. This Code outlines our expectations in relation to occupational health and safety. If suppliers fail to meet our required standards, we take appropriate action to address any deficiencies. During the year 2024 Scan Global Logistics Group conducted 150 supplier assessments in total.

In 2024, Scan Global Logistics Group also developed its supplier management tool. The tool forms part of Scan Global Logistics Group's validated digital Quality Management System ('QMS') and enhances supplier oversight across Scan Global Logistics Group's operations by enabling comprehensive categorization of suppliers. This ensures compliance with internal processes and global standards, including Scan Global Logistics Group's Good Distribution Practice ('GDP') certification. The tool is governed by the Group Quality department.

Throughout the year, Scan Global Logistics Group recorded zero human rights incidents, maintaining our progress toward the target of zero incidents by 2027. No severe violations – such as forced labour, human trafficking or child labour – were reported through our internal mechanisms. Consequently, Scan Global Logistics Gorup did not have to pay any fines, penalties or compensations related to human rights issues during this period.

Reporting and training

We encourage openness and support a transparent culture that encourage employees and others to raise concerns about any issue, violation, or suspicion of malpractice. We seek to ensure that matters can be raised in confidence without fear of reprisal. Any concern can be raised with the Global General Counsel, the Human Resources Department, the VP for People, Leadership & Culture or anonymously by using our Whistleblower system at scangl.com. We investigate and will take steps to address reports of ethical misconduct, including in relation to human and labour rights, raised through our Whistleblowing mechanism in a manner appropriate to the nature of the complaint or impact. In 2024, Scan Global Logistics Group launched a new individual Whistleblower training. The training reinforces our virtue, integrity, and is created for all employees to understand when reporting is necessary and their legal rights when reporting. Our Compliance and Legal team supported by our Global General Counsel, oversee, and monitors our compliance with the human rights standards and conventions and the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

To ensure a high level of understanding of our business activities and the importance of the seriousness of modern slavery, we conduct training in all group policies, including human rights, for all new employees and every year in the global mandatory e-learning platform "Academy" together with tests which all employees must pass to finally receive a diploma for the training as documentation.. The training is mandatory for all employees within the Scan Global Logistics Group.

Approval

This statement has been formally approved by the Executive Management of the Scan Global Logistics Group.



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