

Bibby Line Group – Modern Slavery Statement

Approved by the Bibby Line Group Board, June 2023

Opening statement from Bibby Line Group

Bibby Line Group is a family owned international business that is committed to acting responsibly.

We support the eradication of all forms of slavery, servitude, forced or compulsory labour and human trafficking.

We are unequivocally committed to operating within the law, adhering to our corporate values and policies, which promote ethical business practices, and being responsible to the communities in which we operate.

We have a zero tolerance of modern slavery, servitude and forced or compulsory labour and human trafficking. We also require the same high standards from our contractors, suppliers and other business partners, which include new suppliers of products and services in relation to the Covid-19 pandemic.

As a result each of our subsidiaries publish a Modern Slavery Statement, regardless of whether or not they are required to do so by law. Bibby Line Group Head Office and its subsidiaries had no reported incidents in relation to modern slavery or human trafficking in 2022.

Overview and purpose of the organisation

Bibby Line Group is a diverse and forward-looking family business delivering personal, responsive and flexible customer solutions for over 214 years.

Our purpose is 'To grow the long-term value of the Group'. Guided by our shared values, we are custodians of the family business for future generations, creating a diverse Group of innovative companies that develop colleagues, delight customers and give back to communities.

As part of the company's 'Compass' Sustainability programme, Bibby Line Group works towards its vision of "A family business, known for creating a better future together".

Bibby Line Group operates with strong corporate values below and it upholds high levels of corporate governance and corporate social responsibility:

- Work together
- Be better
- Trust each other
- Be innovative
- Do the right thing

During 2022, the Group was a £205million revenue business, operating in multiple countries and employing approximately 1,273 people in financial services, marine, and infrastructure industries.



Scope and structure

This statement covers Bibby Line Group Head Office (which includes Bibby Line Group Limited & Bibby Holdings Limited) and provides links to our subsidiary statements. We operate substantially autonomous operating subsidiaries, with each business responsible for its own strategy, results and operations.

Each subsidiary is responsible for its own Modern Slavery Statement:

- <u>Bibby Financial Services Ltd</u>
- Garic Ltd
- Bibby Marine Ltd

Bibby Line Group supply chains

Group Head Office employs around 20 people and procures products and services including facilities management, maintenance and cleaning, office equipment and supplies, utilities, communications, recruitment, management consultancy, legal and audit services.

Policies in relation to slavery and human trafficking

All our suppliers are expected to comply with all national and local, relevant law and regulations. Where we become aware of any organisation that has been or is found to be knowingly involved in modern slavery we will cease to trade with that organisation. Other relevant BLG policies and procedures:

- BLG Procurement Policy;
- Recruitment Right to Work Checks;
- Bullying & Harassment policy;
- Whistleblowing Policy;
- Anti-Bribery & Corruption policy.

Our subsidiaries procure a wide range of services and products to meet their business needs and have their own policies and procedures in relation to modern slavery - these are listed within their individual statements.

Due diligence

The potential risks of an inadvertent breach of the principles covered in this statement are managed through our corporate risk framework, based on the "three lines of defence" approach.

Bibby Line Group requires all its subsidiaries to comply with the Modern Slavery Act 2015, and therefore subsidiary statements are reviewed by their relevant subsidiary Board and signed off by a director. The level and extent of due diligence carried out is as appropriate to the subsidiaries and is detailed in their individual statements.

Any incidents or breaches of the Act would be notified to the respective Boards through the risk management process.



As part of our commitment to monitor and reduce the risk of slavery and human trafficking from within our organisation and from those businesses with which we interact, we have adopted the following due diligence procedures:

- We work closely with our supply chains and expect those organisations to ensure compliance and adherence to legislative obligations and to have suitable anti-slavery and human trafficking policies and processes in place,
- We seek to build long standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them,
- We have in place systems to encourage the reporting of concerns and the protection of whistleblowers,
- We maintain and monitor an anti-bribery and corruption register from quarterly employee data. This is approved by the Board on an annual basis,
- We expect a level of due diligence carried out across the subsidiaries, and require them to detail it in their individual statements.

New Modern Slavery Statement Registry Service

Bibby Line Group and its subsidiaries will subscribe to this government service (currently nonmandatory), enabling consumers, investors, NGOs and others to search for statements and scrutinise the action organisations are taking to eradicate modern slavery in businesses and organisations.

Next steps

Bibby Line Group will continue to monitor best practice in this area as it develops and seeks to implement any necessary changes. We will continue to invest and implement relevant training, processes and procedures where appropriate and will also continue to ensure appropriate levels of risk awareness in respect of modern slavery and human trafficking is communicated to all our colleagues.

Validation

This statement is made in relation to the UK Modern Slavery Act 2015, Section 54, and constitutes Bibby Line Group Limited and its subsidiaries' modern slavery and human trafficking transparency statement for the financial year ending 31st December 2022.

Jonathan Lewis Group CEO