

TORM plc: Modern Slavery Statement for the Financial Year Ended 31 December 2023 Issued Pursuant to Section 54 of the Modern Slavery Act 2015

Our Business, Structure, and Supply Chain

TORM plc (“**TORM**” or the “**Company**”) is one of the world’s leading carriers of refined oil products. We operate a fleet of approximately 89 modern vessels with a strong commitment to safety, environmental responsibility, and reliability. TORM was founded in 1889, and has offices in Copenhagen, Houston, London, Manila, Cebu, New Delhi, Mumbai, Dubai, and Singapore. TORM employs approximately 3,200 seafarers and 375 land-based employees. TORM conducts business worldwide.

In December 2018, TORM’s global ship agency business was awarded to Inchcape Shipping Services for a three-year period. Inchcape Shipping Services’ Modern Slavery and Human Trafficking Statement can be found here: <https://www.iss-shipping.com/legal/inchcape-shipping-services-modern-slavery-statement>

Our Policies

In 2009, TORM signed the UN Global Compact as the first shipping company in Denmark to commit to the internationally recognized set of principles regarding health, safety, labor rights, environmental protection, and anti-corruption. After a comprehensive review of the shipping industry, TORM’s value chain and business practices, TORM decided to extend its support to the UN Sustainable Development Goals (SDGs) in the beginning of 2018 and assessed how best to contribute to their achievement by 2030. TORM sees this support as a natural progression of our commitment to the UN Global Compact.

With our Business Principles (available here: [TORM - Responsibility - Reports and Policies](#)) and commitment to the UN Global Compact, TORM is committed to respecting internationally recognized human rights as outlined in the United Nations Guiding Principles on Business and Human Rights. TORM recognizes that implementing the necessary policies and respective processes to be in line with the requirements of the UN Global Principles is part of an ongoing effort. Going forward, TORM will continue to promote its human rights-related policies and processes. As part of the company’s commitment to the UN Global Compact, TORM submits its Communication on Progress every year. Please visit www.unglobalcompact.org to see the reports.

TORM’s Business Principles ensure that we are in compliance with legislation and live up to our commitment to responsible business practices. All of TORM’s standard contracts include rules and regulations wording setting out our business ethics/compliance.

TORM complies with the International Labor Organization’s Maritime Labor Convention, an international set of standards on labor conditions at sea, which was ratified by 30 countries in 2012. All vessels under TORM’s technical management were audited and certified as required under the Maritime Labor Convention of 2006 when it took effect in August 2013. TORM respects employees’ right to associate freely, to join – or not to join – unions and to bargain collectively. TORM offers equal opportunities for its employees as stated in TORM’s Business Principles.

Good labor practices are particularly important in the shipping industry as our seafarers’ working place also serves as their home during the time at sea.

TORM encourages our non-European seafarers to focus on their professional development and qualifications. Therefore, in the Philippines and India, TORM provides incentive payments for seafarers achieving higher academic qualifications, which supports their career progress from junior to senior ranks.

In 2023, TORM has reiterated and reinforced our zero tolerance towards harassment, which is inconsistent with our policies and values, and we put extra focus on preventive measures. We also ensure that our employees have the right tools to handle such situations, along with the knowledge that it is not accepted by the company. All seafarers and office-based colleagues have participated in interactive training courses to understand different types of harassment, what to do if it occurs, and what tools are available to support them.

TORM has a long history of supporting education in India and the Philippines, making the Sustainable Development Goal 4 Quality Education an integrated part of our organization and values. Our commitment ensures a strong pipeline for the industry as a result of our support for maritime educational programs, while also serving as a way in which we can contribute to society with general education support. This helps strengthen the culture of teamwork at TORM, resulting in higher retention and positive brand recognition.

Our supply chain is important to achieve our goals, and we must ensure that our quality standards and responsibility efforts are extended and improved throughout it. We expect our suppliers to comply with recognized international standards and work to improve human rights, labor conditions, impact on the environment, safety, corruption, and quality.

Due Diligence Processes

As part of TORM’s procedure for identifying and mitigating risk, risk assessments and due diligence processes are performed on certain new suppliers, which are assessed as high risk due to contract size, compliance risk exposure and/or the number of subcontractors.

Training

All new employees in TORM are introduced to and trained in the TORM Business Principles upon commencement of their employment. These Business Principles apply to all TORM employees – ashore and at sea – and across all geographies. All employees are responsible for understanding and continuously adhering to the Business Principles in practice.

Whistleblower Function

Since 2006, TORM’s Board of Directors has provided a whistleblower facility with an independent lawyer as part of the internal control system. The Group’s whistleblower policy, which supports the Business Principles, is monitored by the Audit Committee. Instances may occur where an employee assesses that a concern cannot be raised with the superior officer(s), or that a concern is not satisfactorily addressed by the superior officer(s). In such cases, the employee is encouraged to raise the concern using the whistleblower function, which is an external independent lawyer’s office solicited by

the Board of Directors to receive and process concerns and claims relating to TORM raised by TORM employees, business partners, or anyone else. In accordance with the Group's whistleblower policy, the identity of people raising concerns will be protected. The employee can, if preferred, remain anonymous by filing a report by telephone or by letter or by sending an encrypted mail.

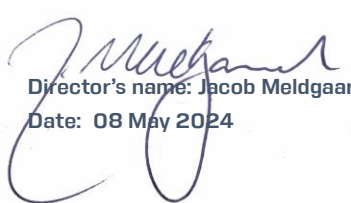
Effectiveness

With a dedicated Head of Group Procurement, Purchase, and Logistics, TORM plc will focus on an efficient CSR approach towards its suppliers with the aim of moving towards eliminating modern slavery.

No claims or offenses have been reported regarding human rights in 2023.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TORM plc's slavery and human trafficking statement for the financial year ended 31 December 2023.

Director's signature:

A handwritten signature in black ink, appearing to read 'J. Meldgaard', written over a faint, light-colored grid background.

Director's name: Jacob Meldgaard
Date: 08 May 2024