



LEIF HOEGH (U.K.) LIMITED

LEIF HOEGH (U.K.) LIMITED; MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2023 ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015 (THE "STATEMENT").

## OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS

Leif Hoegh (U.K.) Limited (the "Company") is a shipping company and is a subsidiary in the Höegh LNG group of companies, with the holding company being Höegh LNG Holdings Ltd.

The Höegh LNG group is a member of the Incentra, a procurement organisation owned by Norwegian ship owners and ship managers, who establishes and manages long term framework agreements with quality suppliers for spares, services and consumables for global vessel operations.

In terms of procurement, we have a centralised function and established group policies and procedures to ensure proper oversight and control of our supply chain. We have established standard purchase conditions which include provisions regarding responsible business and audit rights of the suppliers. We have a separate internal audit team who conducts audits of suppliers and other business partners.

We have a risk-based integrity due diligence process for all new business partners and this process is integrated in the onboarding process of all new business partners which involves representatives from the business units, procurement (for suppliers), accounting, legal & compliance.

## OUR POLICIES

The company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. This statement reflects the Companies zero tolerance approach to slavery and human trafficking. The company complies with the relevant employment legislation/regulations and is committed to the health and wellbeing of all its personnel, and to operating ethically and with integrity.

Adherence to our policies and procedures is the responsibility of all employees. However, a strong leadership is paramount in setting, driving and achieving our goals and the board is actively engaged and the senior management team are expected to lead proactively. All leaders and members of the Höegh LNG group are equally responsible for upholding the core values and desired behaviour, which are anchored in the groups code of conduct, as such is approved by the Board of Directors of Höegh LNG Holdings Ltd. The code of conduct sets out the Höegh LNG groups overarching ethical principles on anti-corruption, human trafficking, fair employment, health, safety and the environment which are to be implemented by all companies within the group. In addition, the code of conduct confirms that all companies in the Höegh LNG group supports and respects the Universal Declaration of Human Rights, right to freedom of association and collective bargaining within the national laws and regulations, as well as stating that companies in the Höegh LNG group does not employ nor contract child labour or any form of forced or compulsory labour as defined by international Labour Organisation's fundamental conventions (ILO Conventions).

The Code of Conduct is supported by a Sustainability Policy which outlines the Höegh LNG groups commitment to act as a socially responsible company by integrating social and environmental considerations into its core business operations. The policy also provides a framework for setting clear goals and objectives for the Company's Sustainability activities.

The Company requires its suppliers and business partners to operate in accordance with the same environmental, social and ethical standards as it does. The company does not knowingly support or deal with any business



involved in slavery or human trafficking and will report any organisations where there are reasonable grounds to suspect their involvement.

The Höegh LNG group has a Supplier Code of Conduct covering areas such as human rights, labour standards and workplace conditions, health, safety and the environment (HSE), anti-corruption and conflicts of interest. As a general rule, all suppliers working with any company in the Höegh LNG group, including agents, lobbyists and intermediaries are required to abide by the suppliers code of conduct, and sign to confirm acceptance and to report any incidents to the Höegh LNG groups compliance officer. Exceptions are only permitted in very narrow circumstances, where compelling reasons exist. In such cases, a special assessment of the supplier is conducted.

In addition to the above, the Company and the Höegh LNG Group have in place procedures for risk assessment and integrity due diligence processes. All business partners are entered into a compliance screening database which checks risk events related to e.g. human rights violations and human trafficking as part of the risk being identified in addition to for example anti-corruption and sanctions.

## DUE DILIGENCE PROCESSES

As part of the company's procedure for identifying and mitigating risk, risk assessments and due diligence processes are performed before onboarding medium and high risk new suppliers and customers, which are assessed based on contract size, compliance risk and/or involvement of sub-contractors. All newly registered business partners are part of the periodic risk sanctions and adverse screening and all active business partners are subjected to continuous monitoring.

Screening and checks against sanctions list maintained by national and international authorities (including but not limited to the United Nations, United States, United Kingdom, European Commission and Norway) are integral parts of our IDD process. Any potential sanctions touchpoint concerning a prospective business partner is escalated for thorough and careful evaluation by HLNG and/or its appointed external IDD expert.

## TRAINING

Training to better understand and respond to the identified slavery and human trafficking risk continues to be performed for the Senior Management Team and relevant employees in the Höegh LNG Group. All employees and consultants are required to complete mandatory training on Code of Conduct and sign-off all compliance policies.

## WHISTLEBLOWER PROTECTION

The Company and the Höegh LNG group operates a speak up and internal investigation procedure, which includes a whistle blowing policy. This provides an internal mechanism for reporting, investigating and remedying any wrongdoing including in relation to modern slavery and human trafficking. The employees are offered various methods of reporting, including anonymously through a third-party service provider. The policy also sets out the legal protection available to whistle blowers and makes clear that victimisations of whistle blowers will not be tolerated.

A *SpeakUp* campaign was launched in 2022 in all vessels and local offices. This aims to increase awareness about the available channels of reporting and ensure that everyone can comfortably raise concerns and report irregularities without fear of retaliation.

Suppliers are required to report any compliance incidents to the Chief Legal & Compliance Officer.



LEIF HOEGH (U.K.) LIMITED

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Leif Hoegh (U.K.) Limited's slavery and human trafficking statement for the financial year ending 31 December 2023.

Director's Signature

Nicholas Green

Date: 08/03/2024

This statement was approved by the Board of Directors of Leif Hoegh (U.K.) Limited on 5 March 2024