

Modern Slavery Policy

Purpose

RightShip's philosophy is to respect and promote human rights and, as part of this, RightShip is committed to addressing modern slavery in our operations and supply chains.

This philosophy aligns with our values, ethical standards and the principles set out in our Code of Conduct.

In striving to maintain high ethical standards, RightShip has adopted this Policy to set out clear standards of conduct and affirm its responsibility to respect human rights.

This Policy is intended to outline the RightShip's commitment to identify, prevent and mitigate modern slavery risks or practices within our operations and supply chains.

Scope

This Policy applies to all persons working for or on behalf of RightShip in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any third-party representatives (referred to, solely for the purposes of this Policy, as "Staff").

This Policy also applies to all those who have, or seek to have, a business relationship with RightShip including suppliers, service providers, agents and vendors and their officers, employees, subsidiaries, agents and sub-contractors (referred to in this Policy as "Business Partners").

All persons to whom this Policy applies must familiarise themselves and comply with its terms. The Policy may be altered by RightShip's Board at any time.

What is Modern Slavery?

The term "modern slavery" describes situations in which coercion, threats or deception are used to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking;
- slavery;
- servitude;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services;
- forced marriage, and
- child labour.

Matters such as substandard working conditions or underpayment of workers may also be present in some situations of modern slavery.

Measuring human rights impact is not straightforward, however modern slavery is less likely to prosper where human rights are respected. Accordingly, RightShip is committed to maintaining and improving systems and processes to avoid complicity with modern slavery practices.

RightShip will communicate its expectations on matters such as business integrity, health and safety, fair working conditions and wages, and further refine its policies to circumvent unethical conduct and unlawful behaviour that is complicit with modern slavery practices. Equally, RightShip will continue pay regard to whether suppliers have systems, policies and processes in place that seek to prevent modern slavery.

Our commitments

In line with our philosophy and values we are committed to:

- complying with all applicable laws which relate to modern slavery;
- taking steps to ensure that there is no modern slavery in our operations and supply chains;
- implementing and maintaining due diligence procedures which are aimed at identifying and addressing the risks of modern slavery;
- upholding accurate records regarding goods and services provided to and by RightShip;
- addressing and remediating modern slavery practices which occur in our operations or supply chains; and
- assessing our suppliers and monitoring their internal approaches to risk management around modern slavery and human trafficking in their own operations and supply chains.

RightShip has implemented various policies and procedures that demonstrate its commitment to being a responsible employer, including a:

- Code of Conduct;
- Equal Employment Opportunity and Anti-Discrimination, Harassment, Bullying and Victimisation Policy; and
- Whistleblower Protection Policy.

These responsible business practices demonstrate that RightShip operates with integrity. This will enable RightShip to attract customers, access new business opportunities and continue to build on its good reputation.

Expectations of staff

The awareness, responsibility and conduct of RightShip employees is instrumental in mitigating the risk of modern slavery within our business.

All RightShip employees have a responsibility to help detect, prevent and report instances of modern slavery or concerns they may have in relation to modern slavery

RightShip is committed to ensuring that all employees have a safe, reliable and confidential way of reporting any suspicious activity. You are encouraged to raise concerns about any issue or suspicion of activity contravening this policy at the earliest possible stage to your manager. If you are unsure whether a particular act contravenes this policy, or you have any other queries or concerns, these should be raised with your manager and/or Compliance Officer¹.

If you are not comfortable, for any reason, with speaking directly to your manager, RightShip has a Whistleblower Policy which affords certain protections against reprisal, harassment or demotion for making the report.

In order to tackle modern slavery, we require all Staff to remain vigilant to risks of modern slavery which may occur in all aspects of our operations and supply chains.

All Staff must:

- act in accordance with the principles and values in our Code of Conduct;
- treat all people with whom they deal with dignity and respect;
- remain alert to any potential risks of modern slavery occurring in our operations and supply chains; and
- immediately report any suspected issues relating to modern slavery.

Managers must:

- respond appropriately if any modern slavery issue or risk is reported to them;
- ensure that any person who believes he/she is a victim of modern slavery in our operations or supply chains has the ability to make a complaint and have that grievance addressed and, if appropriate, remediated; and
- ensure that all relevant Staff are provided with a copy of this Policy and are aware of their responsibilities under it.

Expectations of Business Partners

We expect our Business Partners to:

- act in ways which are consistent with our philosophy, values and our Code of Conduct;
- establish appropriate systems to ensure that they are able to act in a way which is consistent with this Policy;

- identify, assess and immediately disclose to RightShip any actual or potential occurrence of modern slavery or any breach of a human right with which the Business Partner may be involved or associated (either through its own operations or as a result of its business relationships);
- in the event that any such actual or potential occurrence of modern slavery or breach of a human right is identified, take steps to rectify or mitigate it and immediately notify RightShip of the steps taken; and
- adopt a similar policy to this Policy including provisions for the identification and eradication of modern slavery risks in its operations and supply chains.

Consequence of non-compliance

Any non-compliance with this Policy by Staff may lead to disciplinary action up to and including termination of employment or engagement.

Any non-compliance with this Policy by a Business Partner will be regarded as a material breach of our agreement with the Business Partner and may result in corrective action and the suspension or termination of the contractual relationship.

Any non-compliance with this Policy by a Business Partner must be notified to us immediately and we require all Business Partners to cooperate in any investigations or related processes which we may initiate.

References

RightShip documents

- Code of Conduct
- Whistleblower Protection Policy
- Equal Employment Opportunity and Anti-Discrimination, Harassment, Bullying and Victimisation Policy

Policy ownership and review

This policy is owned by the Chief Executive Officer.

This policy requires the annual approval of the RightShip Board of Directors.

Procedural Version Control

No.	Date approved	Date Effective	Section Amended	Authorised by
1	June 2021	June 2021	Initial release	CEO

2	Feb 2023	February 2023	Inclusion of reporting guidelines	CEO
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