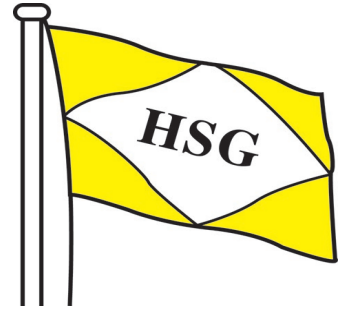


Hadley Shipping Group Limited

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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Hadley Shipping Group¹ and its subsidiary undertakings have taken and will continue to take to address the risk of modern slavery or human trafficking taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Hadley Shipping Group

Hadley is a UK based shipping company that operates an international fleet of vessels (bulk, container and roll-on/roll-off vessels).

Hadley is committed to acting ethically and with integrity and transparency in all business dealings. Hadley aims to ensure there is no modern slavery or human trafficking in any part of its business and supply chain.

In addition, the Hadley fleet conforms to the Maritime Labour Convention which supports a broad range of seafarer employment provisions including minimum requirements to work as a seafarer, requirements for minimum hours of rest, accommodation, health, facilities and other protections.

Accordingly, Hadley expects the same ethical conduct from all of its business relationships and suppliers. Hadley therefore expects each of its suppliers to have procedures in place aimed at ensuring that slavery, human trafficking and child labour is not present within its supply chain.

Sustainability and values

Hadley will not tolerate the practice of modern slavery in any form and is committed to continue to work with all of its stakeholders and relevant regulators to combat this issue, wherever it may become aware of it.

The Board of Directors of Hadley Shipping Group Limited take responsibility of this policy and approved of this statement on 4th December 2020.

Signed for on behalf of Hadley Shipping Group Limited

A handwritten signature in black ink, appearing to read 'James Warwick', written over a horizontal line.

James Warwick

Managing Director

¹ References to “**Hadley Shipping Group**” or “**Hadley**” in this Policy are to Hadley Shipping Group Limited and its subsidiaries. Foreland Shipping Limited, as a subsidiary of Foreland Holdings Limited, is covered under a separate Foreland Shipping Limited statement.