



LEIF HOEGH (U.K.) LIMITED

LEIF HOEGH (U.K.) LIMITED; MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2020 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., a company listed on the Oslo stock exchange.

The Höegh LNG group is a member of the Incentra purchasing organisation owned by shipowners and managers. Incentra not only prequalifies suppliers based on standards that are consistent with the Höegh LNG group's supplier code of conduct, it also conducts HSE audits and supplier evaluations.

In 2017 -2018, changes were introduced to the Höegh LNG group's procurement system to increase oversight and control on its supply chain. This included a new set of terms and conditions for procurement that contains specific sustainability criteria for products and services. In 2018, significant efforts were devoted to further optimise the procurement activities of the companies within the Höegh LNG group by appointing a dedicated global procurement officer and restructuring the procurement department to improve emphasis on financial, quality and CSR aspects in the purchasing process.

Since 2019, the company performs sanction screening for new business partners before they are approved. The sanctions screening tool, called the "GRID", checks various risk events and categories for organizations or persons, which includes Human Rights violations and Human Trafficking as part of the risk codes being identified. The results are considered in the approval of the business partners and might require further investigation for any matches. In 2020, HLNG's Compliance team also performed sanctions monitoring for all existing business partners.

## 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 well being of all its personnel, and to operating ethically and with integrity.

Corporate responsibility is an individual, managerial and line managerial responsibility in the Company and in the Höegh LNG group. 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 Corporate Social Responsibility (CSR) 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 that enable accountability, monitoring and evaluation of CSR performance.

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.

## DUE DILIGENCE PROCESSES

As part of the company's procedure for identifying and mitigating risk, risk assessments and due diligence processes are performed on certain medium and high risk new suppliers and customers, which are assessed as based on contract size, compliance risk and/or involvement of sub-contractors.

## TRAINING

Training to better understand and respond to the identified slavery and human trafficking risk continues to be performed for relevant employees in the global procurement function in the Höegh LNG Group.

## 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.

#### COVID -19 RISK ASSESSMENT

The Covid pandemic in 2020 made a huge impact in the lives of office based employees and seafarers aboard ships. Office based employees were all encouraged to work from home in compliance to the local regulations set by the different countries where we operate and to ensure their safety. Covid-19 surveys were cascaded by the HR team to check the impact of the pandemic to employee well-being and assess their condition not only on their physical health but also on their mental health. Results from these surveys were discussed and action plans are recommended accordingly.

In February 2021, HLNG has signed the Neptune Declaration in support to the world's seafarers. Travel restrictions imposed by the government in different countries has left hundreds of thousands of seafarers stranded onboard ships, which impacts their wellbeing and poses an increased risk of maritime incidents. This campaign is in collaboration with industry and human rights leaders to help resolve humanitarian crisis at sea brought about by the outbreak. Leaders are calling for actions to resolve crew change issues. These actions include proper recognition and priority access to vaccines, implementation of gold standard health protocols, collaboration between ship operators and charterers to facilitate crew changes and ensure air connectivity between key maritime hubs for seafarers.

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 2020.

Director's Signature

Morten W. Høegh

Date: 09/03/2021

This statement was approved by the Board of Directors of Leif Hoegh (U.K.) Limited on 9<sup>th</sup> March 2021



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