

Modern Slavery Act Transparency Statement

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The UK Modern Slavery Act 2015 requires large entities carrying on a business in the UK to publish a statement detailing their efforts (if any) to combat human trafficking and modern-day slavery. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

As part of the shipping industry, “K” Line Group recognizes that it has a responsibility to take a robust approach to modern slavery and human trafficking.

The “K” Line Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organization, structure, activities and supply chain.

The “K” Line Group is a global shipping entity headquartered in Tokyo, Japan but with a network of offices around the globe including the United Kingdom. The UK Group comprises “K” Holding (Europe) Ltd, “K” Line (Europe) Ltd, “K” Line Bulk Shipping (UK) Ltd, and “K” Line Energy Shipping (UK) Ltd*

“K” Line Group’s UK business units’ activities include Car carrier agency, Carbon Neutral promotion, Dry Bulk commercial operation, LNG and Liquefied CO2 shipping management and operations.

* On 1st April 2025 “K” Line LNG Shipping (UK) Ltd was renamed “K” Line Energy Shipping (UK) Ltd.

Relevant company policies.

Charter of Conduct

“K” Line Group companies adhere to a Charter of Conduct (updated in April 2025) which starts with an emphasis on respect for Human rights and compliance with applicable laws, ordinances and rules. In addition, a more detailed implementation document is used.

The Group’s Charter of Conduct can be viewed here:

https://www.kline.co.jp/en/sustainability/sustainability_management/approach.html

The Group is a signatory of the United Nations Global Compact and has expressed its support for the principles related to human rights and labor. The “K” LINE Group Basic Policy on Human Rights was drawn up based on the United Nations Guiding Principles on Business and Human Rights.

The Group’s Policy on Human Rights can be viewed here:

[Respect for Human Rights | Social | Sustainability | Kawasaki Kisen Kaisha, Ltd.](#)

Whistleblowing policy

“K” Line encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Assessing and managing risks in relation to modern slavery.

Managing some parts of our supply chain carries inherent risks of adverse social or environmental impact due to less direct oversight and control of their working conditions and recruiting practices. Typically, apart from office facilities services, these risks would be at locations outside of the UK and include ships under repair where employment conditions of subcontracted workers could present a risk, as does the use of third-party manning and crewing agencies for our shipping businesses.

The “K” Line Group has developed Corporate Social Responsibility Guidelines for Supply Chain management and the UK companies all undertake non price evaluation of suppliers or vendors before appointment. Usually in a written format and can include the requirement for references and where appropriate the condition that “K” Line upholds documents such as the ILO Declaration on Fundamental Principles and Rights at Work. In the UK for providers of contract facilities services we support for example the London Living wage.

The type of ships directly managed (LNG and LCO2) are relatively sophisticated, and as a sector, are a little less exposed to unsatisfactory labour practices than some others.

Due diligence in relation to modern slavery.

As a ship management business, the routine use of on-site/onboard visits, audit process and formalized assessments are employed in line with the ISM code and DOC held for this. Anti-corruption training is carried out both onboard and onshore and in addition continuous contact by senior staff is maintained with ship managers and crewing agencies used by the UK group – which are also on longer term contracts of engagement.

Training in relation to modern slavery.

The “K” Line Group in the UK has raised awareness of modern slavery issues by putting up posters across the organisation's premises including.

- the basic principles of the Modern Slavery Act 2015.
- Characteristics and Signs of Modern Slavery.

Monitoring effectiveness of and evaluation of process in relation to modern slavery.

As well as complying with regulations like the International Ship and Port Facility Security Code (ISPS Code) , we engage with third party contractors and suppliers to ensure they have procedures and policy in place to protect against illegal activity such as human trafficking and modern slavery.

Superintendents from our companies regularly visit owned and managed vessels as well as shore terminals. The “K” Line group is a member of the Maritime Anti-Corruption Network (MACN) and the UK group is committed to promoting transparency and integrity in maritime trade and modules to this effect are included in our ship management system.



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Mr. Jitsuo Narita
Managing Director
“K” Line Holding (Europe) Ltd.
9th September 2025