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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Boluda Towage Europe (BTE) and its subsidiaries Boluda Towage Belgium NV, Boluda Towage Netherlands BV, Boluda Towage Germany GMBH and Boluda Towage UK Ltd., both in the office and onboard our vessels, to ensure that slavery and human trafficking are not taking place in any part of our business and associated supply chains. Further detail on the company structure and sites covered under this statement can be found in the Boluda Towage Europe Organisation chart.

Still to this day, slavery and human trafficking are a scourge on our society and can affect anyone, regardless of age, gender, race, or nationality.

We, at BTE, do not believe that there is a place for such practices in today's world and we recognize our responsibility, as a global company, to tackle such risks by due diligence in the supply chains we are active in and by assessing and mitigating the risks Boluda Towage Europe might face.

All our employees will be trained, providing them with the knowledge and expertise to identify Modern Slavery and Human Trafficking practices during the execution of their work and to familiarize them with the BTE Code of Conduct. In case of any signs of wrongdoing, each employee shall know how to report these cases under the organization's whistleblowing policy. Any whistle-blower shall be protected and not blamed under this same policy.

We are committed to working ethically and with integrity in our business dealings to ensure that all individuals are treated with dignity and respect.

Our aim is to continue to scrutinise and enhance the policies that we have in place to, one day, eradicate such practices altogether. We, therefore, ensure all Boluda Towage Europe employees are trained and made aware of the preventive measures in place to prevent modern slavery from happening.

We always work to the highest business ethics and ensure compliance with all applicable laws and regulations and expect these standards to be mirrored by all the parties we work with.

We are committed to ensuring that there is no modern slavery, human trafficking, or any other wrongdoing anywhere in our supply chain.

Each of our suppliers is expected to adhere to our high standards as laid down in our terms and conditions, code of conduct, and associated vendor selection and assessment procedures.

Our procurement process ensures that key suppliers comply with all necessary laws and regulations and will be transparent about their supply chain and countries they trade-in. The critical supplier will be assessed/audited as part of the supplier assessment procedure. In addition, suppliers are required to:

- Take reasonable steps to protect the health and safety of their own workforce and all workers in their supply chain, Not use or allow to be used any slavery in the performance of their obligations to us.
- Comply with all local laws and best practices regarding the suitability of employee working conditions.
- Allow their workforce the freedom to leave their employment without the threat of deterrents.
- Take steps to prevent the illegal treatment of their workforce by their management or any third party.
- Where necessary, work with us to identify, audit and eradicate areas perceived to be at risk of modern slavery and human trafficking, perform reasonable due diligence to ensure no modern slavery practices can occur; and
- Show a continued commitment to work with us to rectify any risk of modern slavery.

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We are confident in our policy's ability to combat modern slavery and human trafficking and shall ensure that our suppliers and all BTE-employees are familiar with this policy and we have a clear picture of where in our business processes the risks for Modern Slavery practices is could arise.

Each year, we will update this policy capture realistic KPI's as part of our continuous improvement and management review process.

Geert Vandecappelle (CEO)



Boluda Towage Europe
03-09-2020