

**GLOBAL PORTS HOLDING**

**MODERN SLAVERY ACT 2015**

**SLAVERY AND HUMAN TRAFFICING STATEMENT**

**FOR THE FINANCIAL YEAR ENDED 31 MARCH 2024**

**GLOBAL PORTS HOLDING**  
**MODERN SLAVERY AND HUMAN TRAFFIC**  
**STATEMENT**

**1. BACKGROUND**

This statement has been published in accordance with the UK Modern Slavery Act 2015 for the financial year ended on 31 March 2024 (the “2024 Year”), as a follow-up. It sets out the steps taken by Global Ports Holding (“**GPH**” or the “**Company**”) and its subsidiaries and affiliated companies (collectively, the “**Group**”) up to 31 March 2024 to prevent modern slavery in its business and supply chains.

Slavery, servitude, forced labour and human trafficking (modern slavery) are infringements of human rights which have a profound, negative impact on people’s lives.

GPH and the Group commit to ensuring that there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains consistent with our disclosure obligation under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. GPH has a zero tolerance approach to modern slavery of any kind.

At GPH, we recognise the human rights of all people as outlined in the Universal Declaration on Human Rights and our responsibility to respect human rights as set out in the UN Guiding Principles on Business and Human Rights. We strive to prevent the infringement of human rights and to remediate the possible impact on human rights resulting from our activities. We impose the same standards and expectations on the business partners that we engage with. In turn, we expect our business partners to apply equivalent principles and seek to actively support them in their implementation where needed. We encourage our colleagues, business partners and people affected by our activities to raise complaints and grievances about any potential human rights concerns. We address these complaints and grievances fairly, in confidence, and in accordance with laws.

**2. OUR STRUCTURE**

The Company is the largest independent cruise port operator in the world, which operates or invests in 30 cruise ports in 18 countries, and is the operator of one strategically-located commercial port (in Montenegro). Further details can be found at [www.globalportsholding.com/](http://www.globalportsholding.com/)

The Group employed approximately 700 employees throughout the 2024 Year. GPH PLC’s business involves activities ranging from pre-planning, design, development and planning to construction and operation. This means that GPH PLC’s supply chain and the types and volumes of goods and services it purchases will vary from on-site civil works to contracting retail areas to third party operators at the ports it operates. Our ports are operated by subsidiaries and managed by port managers who oversee the daily operation of the relevant port.

**3. DUE DILLIGENCE PROCESS RELEVANT TO SLAVERY AND HUMAN TRAFFICING** The

Act defines Modern Slavery as “slavery, servitude, and forced or compulsory labour” as well as “human trafficking” (“**Modern Slavery**”).

It is important for GPH to be transparent and accountable and the Company is fully aware that multiple risks come with a complex supply chain, including the risk that slavery and human trafficking may exist in these supply chains.

As part of our initiative to identify and mitigate risk and we are assessing our system to:

1. monitor potential risk areas in our supply chain including by reviewing the controls that the suppliers have in place,
2. identify potential risk areas of modern slavery in our supply chain,
3. identify common areas for improvement and focus improvement activities relating to the suppliers,
4. mitigate the risk of modern slavery and human trafficking occurring in our business or supply chain in this period, and
5. protect whistle blowers.

In the event that we become aware of a case of Modern Slavery occurring within our supply chain, we will work with the supplier to implement remedial action. In all cases, consideration will be given to the approach that produces the safest outcome for potential victims of Modern Slavery. We expect our suppliers to engage with us constructively and responsibly, and to demonstrate their willingness to remedy issues in a timely manner. GPH reserves the right to refuse to partner with suppliers that do not achieve or are unable to demonstrate progress towards the eradication of Modern Slavery within their organisations and supply chains.

#### **4. AWARENESS RAISING**

In order to ensure high level of understanding of risks of modern slavery and human trafficking in our business and supply chains, we provide, and intend to continue to provide, training to relevant parties.

#### **5. BOARD APPROVALS**

The Modern Slavery and Human Trafficking Statement is an integral part of the Group's directives and/or policies. It has been approved, and is reviewed and affirmed annually, by the Board of Directors.

#### **6. NATURE OF THE STATEMENT**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for financial year beginning 1 April 2023 and ending 31 March 2024.



Mehmet Kutman

Chairman

**Global Ports Holding**

Date: 28 June 2024