



forced labor policy statement

Version 1.0
December 14, 2022

INTRODUCTION

Green Worldwide Shipping (hereafter may also be referred to as “we”; “us”; “Green”) is a freight forwarder and provider of regulatory compliance and global trade solutions services. As we work to serve our customers and meet our own objectives through [The Green Way](#), we do so with respect of human rights as a top priority.

Therefore, we have engaged external subject-matter experts to assist with developing a reasonable approach to human rights that will enable us to meet our own standards and relevant compliance requirements, and most importantly to have the most significant impact possible within our global value chain.

The result of our collaboration, a policy and a corresponding program to ensure the policy’s implementation, is described below.

POLICY

Green Worldwide Shipping is committed to eradicating, and prohibits the use of, forced labor, human trafficking, modern slavery, and/or any other type of forced or compulsory labor¹ in our global value chain. Green also requires that our suppliers and business partners have the same or similar commitment.

¹ We use the term “forced labor” to refer to any and all types of coerced labor, such as, but not limited to, human trafficking, modern slavery, the worst forms of child labor, organ harvesting, indebted servitude, etc.

PROGRAM

In collaboration with third-party experts and utilizing a variety of resources² from different stakeholder groups³, we have developed a program to ensure we meet the objectives of our policy.

We have determined, in good faith, that the most reasonable approach is for the program to be designed to comply with all relevant legislation concerning forced labor⁴, in letter and in spirit. Moreover, the program is designed to conform with multinational frameworks, such as the best practices put forth in the OECD Responsible Supply Chain Framework⁵, and takes a risk-based approach that includes risk identification, assessment, mitigation, and due diligence.

In addition, Green is cognizant of the ever-changing nature of the global value chain and will implement the program continuously, based on cyclical iterations that include the review of, and when necessary, the update to, this specific document. Cyclical iterations shall also include supplier engagement, data collection, risk remediation and public reporting.

GRIEVANCE MECHANISM

If you become aware of or suspect any use of forced labor in our global value chain, or conditions that create a risk of forced labor, please notify Green promptly at forcedlabor@greenworldwide.com. Green employees and business partners are required to do this by our Codes of Conduct.

All reports are taken seriously and investigated, and if substantiated, resolved through corrective action. Corrective action is determined through review of the business relationship by the relevant department and may include, but is not limited to, suspension or termination of the business relationship.

² Resources include, but are not limited to, officially published guidance for compliance with relevant legislation, and independent research commissioned by investor advocacy groups and non-governmental organizations

³ See Table 1 for a sample of stakeholder groups

⁴ See Table 2 for a sample selection of the relevant legislation

⁵ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, 2016

Table 1. A sample of resources used to develop our program

Resource	Institution
Official Modern Slavery Act Guidance	Australian Government, Department of Home Affairs
Forced Labour Convention, 1930 (No. 39)	International Labour Organization
Transparency in Supply Chains etc. A practical guide	Office of the Home Secretary United Kingdom
The Shifting Gears Report: An Assessment of Human Rights Risks & Due Diligence in the Automotive Industry	Investor Advocates for Social Justice

Table 2. A sample of relevant legislation

Name	Acronym
California Transparency in Supply Chains Act (2010)	CA-TISCA
EU Non-Financial Reporting Directive (2014)	EU-NFRD
US Federal Acquisition Regulation (2015)	US-FAR
United Kingdom Modern Slavery Act (2015)	UK-MSA
Countering America's Adversaries Through Sanctions Act (2017)	CAATSA
Australian Modern Slavery Act (2018)	AU-MSA
Uyghur Forced Labor Prevention Act (2021)	UFLPA