



human rights due diligence report

Reporting Period 2022 – 2023

OBJECTIVE

The document is our inaugural Human Rights Due Diligence (HRDD) Report. Its purpose is to demonstrate Green Worldwide Shipping's dedication to being a responsible and sustainable partner in the global value chain by:

- Fulfilling the reporting requirement described in several human rights statutes
- Meeting our own standards by providing transparency to all stakeholders and any interested parties

The information in this document provides insight into the creation and first iteration of our HRDD Program, for Reporting Period 2022-2023 (January 1, 2022 – May 31, 2023).

ENTITY

Green Worldwide Shipping, LLC (hereafter referred to as “Green” and/or “we,” “our”) is a forward-thinking provider of international supply chain logistics, freight forwarding, and technology and sustainability solutions for supply chains. We are headquartered in Decatur, Georgia, USA.

Green offers a wide range of knowledge-based services. This includes freight services such as freight forwarding and eCommerce, and global trade solutions such as duty drawback and trade consulting. Green also offers physical-based services, such as warehousing and consolidations.

Founded in 2008, Green has 16 offices located throughout the United States and does business globally.

POLICY

In collaboration with various stakeholders and external subject-matter experts, Green Worldwide Shipping has developed a policy to address human rights due diligence with a focus on forced labor and modern slavery. The policy reflects our commitment to the prohibition and eradication of forced labor and modern slavery in the global value chain.

The [policy](#) is accessible on the [Human Rights Due Diligence page](#) of our website.

OPERATIONS, SUPPLY CHAINS, AND ASSOCIATED RISKS

Green has determined, in good faith, that the most reasonable method to identify risk in our operations and supply chains is to implement a risk-based approach, as described by the Organisation for Economic Co-operation and Development (“OECD”)¹, the Department of Homeland Security (“DHS”)² and the official guidance³ issued for compliance with the Australian Modern Slavery Act.

To implement a risk-based approach, we collaborated with external subject-matter experts to identify potentially at-risk business partners comprising a representative sample of our business partners. Green’s process for identifying potentially at-risk business partners resulted in a four-part segmentation of the business:

- Air Carriers (solicited: all)
- Ocean Carriers (solicited: all)
- International Agents (solicited: most-preferred)
- Truckers (solicited: most-used)

Our Air and Ocean Carrier segments reflect a significant portion of our value chain by dollar value. Our most-preferred International Agents reflect a significant portion of our overall business operations. Trucking reflects a large volume of the transactions in our supply chains.

RISK MITIGATION AND DUE DILIGENCE

Following the initial identification of business partners that may be at-risk, Green implemented a two-step due diligence process to mitigate potential risk.

The first step involved soliciting human rights and forced labor data from the identified business partners. This data serves as a baseline measurement for following years, and to determine if any escalation or further risk mitigation is necessary. For

¹ (OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, 2016)

² (US Department of Homeland Security, 2022)

³ (Australian Government, 2018)

data solicitation, we utilized questions from the eLRT Lite, an open-access survey that facilitates accurate and reliable data exchange on labor rights practices.

We provided educational materials to relevant business partners with the data solicitation, demonstrating our commitment to the risk mitigation due diligence process. The training materials include, but are not limited to: educational information on human rights with a focus on forced labor, Green's Policy and Program, instructions for completing the survey from the data solicitation, and free resources such as the National Human Trafficking Hotline.

For the second step of the due diligence process, we reviewed the data provided by our business partners, and, where necessary, took additional action, such as escalation and further communication with business partners.

RESULTS OF ACTIONS AND MEASURING EFFECTIVENESS

During this initial, pilot iteration of our HRDD Program, Green has established a baseline of data. Pending the completion of further iterations, we may be better positioned to do inferential statistical modeling, adding a degree of scientific measurability to our work.

Notwithstanding the brevity of collectable data for any entity at this stage, we have gained valuable insights as a result of our findings. For example, analysis of the data that we received indicates that educating the value chain on fundamental issues would be very beneficial. We found that multiple business partners do not have a policy, or aren't aware of their organization having a policy, that prohibits forced labor. It seems that many actors in the global value chain take prohibition of forced labor and modern slavery, and its subsequent effects on human rights, as a given, when in fact the issues are ongoing and pervasive. Therefore, in addition to our planned improvements for the next iteration of our HRDD Program, education will be a key element moving forward.

Nonetheless, throughout the duration of this iteration of our HRDD Program described herein, Green has not received any independently verifiable indication that human rights violations related to forced labor and modern slavery have occurred.

Green remains committed to due diligence in this field.

SUMMARY OF RELEVANT AND SIGNIFICANT STEPS

Green Worldwide Shipping has taken a number of significant steps in the effort to be a responsible, sustainable, and transparent actor in the global value chain, that supplement the work conducted in our HRDD Program. These include:

- Developed and adopted a new policy specifically prohibiting forced labor and modern slavery

- Published a new, [accessible page](#) on the website dedicated to human rights due diligence⁴
- Added an accessible link to our new HRDD webpage, in a prominent and easy to see location, pursuant to the guidance⁵ issued for meeting the requirements of the California Transparency in Supply Chains Act, in addition to other regulatory guidance documents
- Published a new [Employee Code of Conduct](#) and [Business Partner Code of Conduct](#)
- Established a grievance mechanism (whistleblower mechanism) specifically for human rights due diligence, which is available at forcedlabor@greenworldwide.com
- Provided multiple types of educational training to employees specific to human rights due diligence, as well as forced labor risks specific to the trucking sector
- abolitionist non-governmental organization specializing in disrupting human trafficking in the trucking sector

REFERENCES

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- US Department of Homeland Security. (2022). Strategy to Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labor in the People's Republic of China. Office of Strategy, Policy, and Plans. Retrieved February 10, 2023

⁴ <https://www.greenworldwide.com/human-rights-due-diligence/>

⁵ (Harris, 2015)