Bunker Holding Group

HUMAN RIGHTS POLICY

2026

OUR COMMITMENT

At Bunker Holding, we recognise that respect for human rights is fundamental to responsible business. We are committed to upholding the dignity, freedom, equity, and equality of every individual in line with international human rights standards and the relevant legal frameworks. Our approach is guided by:

- The UN Guiding Principles on Business and Human Rights (UNGP)
- International Bill of Human Rights
- International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- The UK Modern Slavery Act
- The EU Corporate Sustainability Reporting Directive (CSRD)

As a global leader operating worldwide in purchasing, selling, and supplying marine fuels and related products and services, we are conscious of our responsibility to manage complex supply chains and the human rights and modern slavery risks that may arise within them. This begins with identifying potential impacts and taking action to prevent or mitigate them. Through our due diligence processes and ESG programme, we aim to promote responsible practices in our operations and management of business relationships, including suppliers and clients.

We also recognise that human rights risks evolve and preparing this policy is not a one-off exercise. Instead, it is a living framework where we regularly review our practices, learn from experience, and engage with stakeholders to continuously improve our performance.

SCOPE

This policy applies to all employees, officers, and directors of Bunker Holding, and extends to our global operations, subsidiaries, joint ventures and contractors. We also expect our suppliers and business partners to share our commitment and to cascade these expectations through their own operations.

SALIENT HUMAN RIGHTS ISSUES

We focus our efforts on the human rights areas where our industry and global footprint create the highest risks and responsibilities: *safe and healthy working conditions; non-discrimination and fair treatment; adequate wages, benefits and working hours; forced and child labour; access to remedies and non-retaliation; freedom of association and collective barganing; privacy and data protection; impacts of climate change.*

Example	Own workforce	Workers in the value chain	Affected communities
Safe and healthy working conditions	●	●	○
Non-discrimination and fair treatment	●	●	○
Adequate wages, benefits and working hours	●	●	○
Forced and child labour	○	●	○
Access to remedies and non-retaliation	●	●	●
Freedom of association and collective bargaining	●	○	○
Privacy and data protection	●	○	○
Impacts of climate change	○	○	●

● Most affected, ○ Less affected

Safe and healthy working conditions

We provide safe, healthy, and respectful working environments for our employees in offices and for contracted crew on vessels, aligned with international standards such as the ILO Maritime Labour Convention (ILO-MLC).

In our supply chain, we monitor health and safety practices in high-risk operations, including fuel transfers and logistics, to prevent accidents and environmental harm.

Non-discrimination and fair treatment

We do not condone discrimination, harassment, or abuse (whether verbal, physical, written, or behavioral) in the workplace that creates an intimidating, hostile, or offensive environment.

We promote equal opportunities in recruitment, promotion, and compensation, regardless of race, gender, religion, age, disability, or any other protected status.

Adequate wages, benefits and working hours

We support decent wages, fair working hours, safe and healthy working conditions, and life balance for our employees.

In our supply chain, we expect our suppliers and partners to meet or exceed industry and legal standards for seafarers and other workers.

Forced and child labour

We regard any form of modern slavery, servitude, human trafficking, or forced labour as serious crimes and in violation of fundamental human rights.

Throughout our business, we are committed to ensuring that these do not take place, and we expect every customer, supplier, partner, and other external stakeholder to uphold the same standards, and we emphasize the importance of fair and ethical treatment of foreign migrant workers across our supply chain.

We comply strictly with all local laws and regulations. We require our business partners to commit to the same and will terminate working relationships with those who are found to have exposure to such practices.

Access to remedies and non-retaliation

We ensure that employees, contractors, and stakeholders have safe, accessible channels to raise concerns or violations.

We uphold a strict non-retaliation policy to protect anyone who reports concerns or violations in good faith.

The following are secure channels through which concerns can be raised on a confidential basis:

- Via the Bunker Holding Group's Whistleblowing Report web-based platform which can be found on the MyBunker intranet, or on the Bunker Holding Group websites
- Via email sent to whistleblower@bunker-holding.com; and
- Via post to Strandvejen 5, DK-5500, Middelfart, Denmark, attention to the Compliance Officers.

Freedom of association and collective bargaining

We respect the rights of workers to join trade unions and engage in collective bargaining, and we support dialogue between management and employee representatives.

We strive to assure that no employee will be subject to discrimination, harassment, or adverse treatment for exercising their rights to freedom of association or collective bargaining.

Privacy and data protection

We are committed to protecting employee data and preventing unauthorized access or breaches, particularly given the increased use of digital tools and AI.

Impacts of climate change

We believe that the journey to a low-carbon shipping sector must be fair and inclusive. A just transition means making progress on decarbonization while supporting the people and communities most affected by this shift.

We recognize that environmental responsibility is deeply connected to human rights, including the right to live in a clean and healthy environment.

Guided by the International Maritime Organization's 2050 towards-zero target, we are committed to reducing harmful emissions that impact human health and safety, while aiming to protect the local communities around us.

We consider it a strategic priority to have a well-established climate transition plan and act to mitigate physical and transitional climate risks.

DUE DILIGENCE AND RISK MANAGEMENT

We conduct ongoing assessments to identify, prevent, and mitigate human right risks in our operations and supply chain. Our approach includes:

Know Your Supplier (KYS) checks

We conduct compliance-focused reviews of counterparties, including sanctions screenings, adverse media, and other risk indicators, to ensure transparency and reduce legal and reputational risks.

Global Business Partner Responsibility Conduct (GBPRC) questionnaire

We engage with our suppliers to conduct self-assessments on ESG-related topics to evaluate their practices, identify potential gaps, and encourage alignment with international standards.

Risk categorisation

We assess and rank suppliers annually by risk level, with enhanced monitoring for those identified as high-risk.

We are also targeting a framework for supplier audits, with particular focus on high-risk regions and activities. This will strengthen engagement with suppliers to encourage improvements and further develop responsible practices.

MITIGATING ACTIONS

We take proactive steps to prevent and address human rights risks in our operations and supply chain. These include:

Code of Conduct

Our Code defines values and clear expectations for all employees and business partners.

Policy development

We continuously review and strengthen internal policies to identify and address potential risks and impacts stemming from business activities.

Training and awareness

Employees and suppliers receive both general and targeting information to build awareness, support policy implementation and ensure responsible decision making.

Stakeholder engagement and corrective action

We continuously engage with employees, suppliers, clients and communities to better understand concerns and perspectives, leading to more informed and effective human rights practices. Where risks are identified, we will consider corrective actions, and in serious cases, escalate to management or terminate relationships.

POLICIES AND GUIDELINES IN PLACE

- Code of Conduct
- Global Business Patner Responsibility Conduct form
- Whistleblower policy
- Global Employee Handbook
- Health and safety policy
- Anti-harrassment policy
- Stress policy
- Data protection policy
- Information risk management policy
- Statements in annual reporting and ESG Progress Review
- Carbon targets and ESG commitments

Please refer to the latest Annual Report or ESG Progress Review to learn more about the policies in place.

GRIEVANCE AND REMEDY

We promote open communication and a safe environment for raising concerns to proactively address risks. Where we are found to have caused or contributed to harm, we commit to providing or cooperating in effective remedy. Accessible and effective reporting channels are available to all employees and business partners:

Whistleblower system

There are various channels available to all employees and third parties.

Confidential reporting

All reports are handled in confidence and with sensitivity and respect.

Non-retaliation

Non-retaliation measures will be taken against those who raise concerns in good faith.

Structured process

We have implemented a structured process to address issues promptly and appropriately.

GOVERNANCE AND ACCOUNTABILITY

As part of our ESG Governance, the Board of Directors and our CEO have oversight and approval of this policy.

The policy undergoes an annual update to continuously review and assess improvement opportunities and effectiveness, internally as well as commercially. The policy is available on our website.

Operational responsibility and ownership of this policy sits between cross-functional business areas, each contributing with different areas of expertise to meet our human rights responsibilities across the organisation.

Level	Role
Board of Directors	Strategic Oversight
Executive Management	Accountability
ESG and Compliance Committee	Governance
Functional Leads • HR • ESG-Q • Legal • Compliance • Sourcing	Ownership
All Employees	Responsibility

TRANSPARENCY AND REPORTING

We are committed to transparency in how we manage and report on human rights matters in line with the EU Corporate Sustainability Reporting Directive (CSRD). All incidents and complaints are addressed through formal channels and handled with strict confidentiality to protect those involved. We track and evaluate any related fines, penalties, or remediation measures to ensure they are identified, addressed, and used to strengthen our practices.

As part of our annual reporting obligations, we disclose aggregated information on human rights incidents while respecting privacy and the sensitive nature of individual cases. All subsidiaries are included in the scope of these consolidated data. This approach reflects our commitment to compliance, accountability, and continuous improvement in upholding human rights across our operations.

Further, we engage in annual sustainability ratings with third-parties assessing our progress within key ESG categories such as Environment, Labor & Human Rights, and Sustainable Procurement, and this policy emphasises and fomalises our commitment.

Bunker Holding Group

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