Modern Slavery Statement

Relating to the period from

1 January 2025 to 31 December 2025

1. Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Arise P&L Limited ("APL") and where relevant, its wider group, including its overseas operating subsidiaries during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking within APL's business activities and supply chains. The UK intermediate holding companies are non-trading entities, and the overseas operating subsidiaries do not carry on business in the United Kingdom.

Modern slavery is a serious abuse of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, child labour, debt bondage and human trafficking. These practices involve the exploitation of individuals and the loss of their freedom for personal or commercial gain.

APL does not tolerate modern slavery or the abuse of human rights in any part of its business or supply chain. We are committed to conducting business responsibly, ethically and in accordance with applicable laws and standards, and to treating allegations or indicators of abuse seriously.

BOARD ACCOUNTABILITY

This statement has been approved by the Board of APL and signed on behalf of the company by an authorised director.

In this document

2. Our Business & Supply Chain

APL is a UK-registered holding company providing group-level governance, oversight, treasury management and strategic direction across a portfolio of port and logistics businesses in Africa. APL establishes group expectations for policies, risk management and reporting, while its subsidiaries manage local operations and implementation.

Our portfolio currently comprises three port assets located across Gabon and Côte d'Ivoire, in which Arise P&L holds a 66.34% to 80% percent ownership interest.

OPERATING CONTEXT

Port operations rely on a broad contractor and supplier base. Labour-intensive services, outsourced work and complex subcontracting can reduce visibility over employment practices and heighten labour-rights risk.

Our supply chain includes

Port operations & cargo handling	Stevedoring, labour supply and quayside services.
Transport & logistics	Trucking, logistics, worker transport and related services.
Facilities & site services	Security, cleaning, waste management and limited site facilities or accommodation.
Engineering & maintenance	Maintenance, technical services, construction and EPC contractors.
Operational goods	Uniforms, PPE, equipment, spare parts and other operational materials.
Port Specific Equipment	plant and equipment for lifting materials, moving materials and marine equipment.
Construction and expansion projects	requiring engineering, civil-works and material supply;

3. Modern Slavery Risk Within our business and supply chain

Ports may be used as entry routes for human trafficking, and crews on vessels from other jurisdictions may be exposed to sub-standard or coercive working conditions. Our Ports work with relevant authorities and stakeholders in relation to these issues, and Group policy provides guidance to employees who identify concerns. Furthermore, each of our ports operate under the International Ship and Port Facility Security (ISPS) Code, governed by the International Maritime Organization. Key safeguards include:

- Certified Port Facility Security Officers trained by government authorities;
- Port Facility Security Plans and Assessments, reviewed annually;
- Strict access controls, vessel checks, and cooperation with customs and border agencies;
- External audits and re-certification every three years.

These measures significantly reduce the risk of ports being misused for trafficking or other illicit activities.

APL considers risk by reference to geography, sector, work type, labour model, supplier category, contractor exposure and the degree of visibility over subcontractors and agency workers.

Higher-risk categories identified in 2025

Risk area	Why it matters
Manpower agencies & stevedoring	Use of contingent labour and reduced visibility over recruitment and employment terms.
Trucking & logistics	Outsourced labour and dispersed operations
Construction & EPC	Labour intensity, subcontracting chains and temporary workforces.
Security, cleaning & maintenance	Agency arrangements, low visibility and potentially vulnerable workers.
Waste handling & other labour-intensive services	Operational exposure and reliance on third-party workers.
Subcontractors & labour brokers	Limited transparency beyond the principal contractor.

Key mitigation measures include:

- **Single EPC Contractor Model:** For major projects, we appoint a single Engineering, Procurement and Construction (EPC) contractor responsible for its subcontractors. Each must comply with the Supplier Code of Conduct.
- **Project Management Consultants:** Independent consultants monitor EPC performance, including labour-management and modern-slavery provisions.
- **Supplier Engagement:** Seminars and onboarding sessions are held with key suppliers to communicate labour, health and safety, and ethical-procurement standards.
- **Employee Induction:** Every employee receives the Group Code of Conduct during onboarding, reinforced through workplace noticeboards outlining labour rights.

4. Procurement, Due Diligence & Transparency

Subsidiaries have conducted supplier and contractor screening processes that included KYC review, verification of regulatory documentation and contractual compliance requirements. The extent and depth of controls varied between subsidiaries.

Core due diligence controls reported

- Supplier KYC and registration checks.
- Business and labour licence verification.
- Tax and social-security compliance documentation.
- Supplier Code and contract-clause requirements.
- Age verification and medical certification before site access.
- Selected payroll, working-hours or overtime reviews.
- Site access, identification and PPE controls.

5. Governance, Policies & Contractual Controls

APL provides group-level governance and expects subsidiaries to identify, manage and report labour-standard and modern slavery risks within local operations and supply chains. The Manual expressly prohibits child labour, forced labour, debt bondage, and human trafficking in any part of our operations or supply chain. All managers, supervisors, and worker representatives receive training on these standards.

Subsidiary senior management teams are responsible for local implementation, compliance with local law and escalation of material concerns to Group functions.

Roles and accountability

APL	Sets group expectations, governance standards and reporting requirements.
Subsidiary management	Implement local controls and monitors for higher-risk contractors.
Human Resources	Manages workforce grievances and employment matters.
Legal & Compliance	Supports due diligence, contractual controls and escalation.
Procurement	Integrates labour standards into onboarding, tendering, renewals and contractor management.
QHSE	Supports inspections, access-control checks and contractor monitoring.

Policy framework

The ARISE Group Policy Manual includes the following key supporting policies:

- **Supplier Code of Conduct**, requiring suppliers to avoid child, forced, or involuntary labour and to uphold fair treatment of workers.
- **Whistleblowing Policy**, providing confidential channels for reporting concerns;
- **Health, Safety and Environment Policy** and **ESG Policy**, reinforcing respect for human rights;
- **Procurement Policy**, integrating social and ethical criteria into supplier selection.

These Policies remained in force during FY2025 and applied to the relevant entities. Supplier and contractor requirements include compliance with applicable labour laws and provisions prohibiting forced labour, child labour and related exploitation.

Governance oversight rests with the Board Audit & Risk and Compliance Committee (BARCC), the Human Resources Committee (HRC) and Subsidiaries board which review modern-slavery and grievance matters quarterly.

6. Monitoring, Grievance & Awareness

Our Legal and HR teams conduct periodic audits of long-term contractors, reviewing compliance with national labour legislation and Arise P&L standards. Reviews include:

- verification of wage payments and working hours.
- confirmation that medical checks and welfare facilities meet statutory requirements.
- evidence of absence of child labour and coercion.

We also maintain regular engagement with employee unions and health and safety committees and collaborate with Labour Ministries in Gabon and Côte d'Ivoire to ensure full compliance with local law.

All the subsidiaries conducted monitoring activities in varies from during the year. This includes contractor evaluations, field inspections, payroll audits, worker interviews and accommodation checks.

Labour-standard findings reported

- Late salary or social contribution payments by certain third-party employers.
- Non-compliant or delayed PPE provision.
- Expired medical certificates.
- Workers without signed employment contracts.

These matters were discussed and solutions implemented. In one instance, a vendor contract was terminated following repeated labour-standard non-compliance concerning salary-payment delays and PPE provision.

Based on our review, no confirmed cases of forced labour, child labour, human trafficking, debt bondage, recruitment-fee abuse, identity-document retention or wage withholding were reported during FY2025.

Group-level whistleblowing reports and investigations have not identified any related allegations.

Grievance and reporting channels

An ethics and whistleblowing mechanism is available to employees, contractors and agency workers through emails, call and complain boxes. Four grievances were recorded and resolved, and none related to modern slavery indicators.

Training and awareness

During the year, broader compliance and labour-related awareness activities were conducted during FY2025. In June 2026, dedicated training of senior managers of all the 3 ports was conducted.

7. Review of Progress & 2026 Priorities

APL is committed to strengthening its practices to prevent modern slavery and human trafficking. The 2025 reporting process identified both areas of progress and clear opportunities to improve consistency, evidence and Group-wide oversight.

Priority actions for 2026

Priority	Planned action
Training	Deliver targeted awareness training to management, Procurement, HR, Legal, Compliance, QHSE and operational supervisors.
Contractor engagement	Expand awareness for labour providers, trucking, security, cleaning, maintenance, construction/EPC and stevedoring contractors.

Approval & Signature

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Arise P&L Limited and its subsidiaries for the financial year ended 31 December 2025.

This statement was approved by Arise P&L Limited on 24th July 2026 and signed on behalf of Arise P&L Limited by:

Name	Kim Fejfer
Title	Chairman
Signature	Kim Fejfer