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Date
January 22, 2026

Direct-dial number
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Our reference
260122AHa/JKo

Subject
BG Freight Line B.V.

Dear Management Board members,

We are writing on behalf of ITF-Netherlands and FNV Havens with an urgent request for you to intervene regarding serious and structural occupational and safety abuses, as well as violations of workers' rights.

The International Transport Workers' Federation (ITF) is a democratic global federation of trade unions in the transport sector, representing more than 16 million workers in 150 countries. ITF-Netherlands represents the ITF in the Netherlands. FNV Havens is a trade union that represents port employees within the Dutch Trade Union Confederation (Federatie Nederlandse Vakbeweging, FNV).

The purpose of this letter is to inform you regarding serious and structural occupational and safety abuses on board ships used for the maritime services of BG Freight Line B.V., an indirect subsidiary of Peel Ports Group Limited. As far as can be determined on the basis of publicly available information, Peel Ports Group Limited is a company in which institutional investors participate, including APG Asset Management, in their capacity as asset manager acting on behalf of pension funds.

In view of this indirect investment relationship, as well as your role as asset manager and your explicit policy choices regarding sustainability and responsible investment, we believe it is both justified and necessary to approach you directly. As part of your stewardship and responsible investment policies, you have publicly and formally committed to complying with international standards, including:

- the UN Global Compact;
- International Labour Organization (ILO) core conventions;
- the OECD Guidelines for Multinational Enterprises;
- industry-specific treaties such as the SOLAS Convention and Maritime Labour Convention 2006 (MLC 2006).

Over the past few months, ITF-Netherlands and FNV Havens have conducted a study involving a number of ships within the feeder business. The study focused on charter ships operated by BG Freight Line, a subsidiary of Peel Ports Group Limited.

The results demonstrate that structural and recurring deficiencies that violate applicable international labour, safety, and human rights standards occur on BG Freight Line ships. These issues are not incidental, but clear patterns that occur on multiple ships. The following has been reported:

- systematic refusal to grant ITF inspectors access, even when vessels are operating under valid foreign ITF agreements and ITF inspectors should therefore be allowed on board;
- hazardous lashing operations carried out by crew members without adequate training and fall protection;
- structural understaffing on board, leading to unsafe situations and serious overburdening;
- manipulation of working and rest hours, structural overtime without proper remuneration, and incorrect or inadequate recording of working time;
- limited or absent access to communication facilities (internet/data), resulting in crew members becoming isolated and obstruction of contact with the outside world;
- culture of fear and intimidation, resulting in employees no longer reporting incidents because they are afraid of potential retaliation or dismissal;
- active pursuit and support of legal proceedings aimed at challenging the operation and validity of collective labour agreements, including participation in an ongoing appeal, thereby placing pressure on the position of employees and undermining the functioning of collective bargaining.

This situation points to a structural failure to comply with and monitor safe working conditions and workers' rights. The aforementioned practices are in violation of your own environmental, social, and governance (ESG) and stewardship policies. As a major institutional investor and asset manager acting on behalf of pension funds, from the perspective of due diligence, you share responsibility for standards of behaviour at the companies in which you invest.

We therefore urge you to engage in an open and substantive conversation with ITF-Netherlands and FNV Havens. We are prepared to elaborate further on our findings, supported by documentation and witness statements.

We kindly request that you respond within four weeks of the date of this letter with a proposal for a date and a time for a joint meeting. We are, of course, willing to share all relevant documents and additional information with you.

In view of the ultimate responsibility of pension funds for the investment and stewardship policies carried out by their asset manager, this letter has also been submitted to the Board of Management of Stichting Pensioenfonds ABP.

We trust that, in light of your social responsibility, you will treat this matter with the necessary gravity and diligence.

Kind regards,

Gijs Mol and Koen Keehnen
ITF inspectors

Asmae Hajjari and Niek Stam
FNV Havens trade union officials

C.c.: Board of Management of Stichting Pensioenfonds ABP