

# Modern Slavery & Human Trafficking Policy

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<b>PP013</b>	<b>April 2022</b>	<b>HR Department</b>	<b>April 2023</b>
Policy Number	Reviewed Date	Accountable	Next Review Date
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### **Modern Slavery and Human Trafficking Statement**

The Company is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015 (“the Act”).

We oppose slavery and human trafficking in all its forms and make this statement to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and its supply chains.

### **Organisational Structure and Supply Chains**

Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the **Modern Slavery Act 2015**, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

We provide dedicated commodity storage, forwarding and 4PL services for soft commodities and metals within the UK, Belgium and Netherlands. We handle thousands of tonnes of materials every year managing the supply chain, shipping from origin through to customs, warehousing and onward distribution.

We currently operate in the United Kingdom.

## Relevant Policies

Our Modern Slavery and Human Trafficking Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We are committed to improving our practices and policies, internally and throughout our supply chain, to combat slavery and human trafficking. We will be writing to suppliers seeking assurance that the principles of the Act are being followed/adopted, though clearly expecting a more complete and robust attestation from those few suppliers who directly fall under the Act. Where no assurance is forthcoming, we will engage with those parties at contract review to ascertain whether there is enough concern to replace them.

We also operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing Policy**

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities or our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee Code of Conduct**

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

## Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our suppliers. We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure they meet the standards of the code and improve their worker's working conditions. We will only engage with labour suppliers who hold a current GLAA licence.

Our due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Reviewing GLAA licences of labour suppliers
- Reviewing on a periodical basis all aspects of the supply chain;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan including terminating the business relationship.

## **Training**

We require all staff/staff working in high-risk areas within the organisation to complete training on modern slavery.

Our modern slavery training covers:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What steps we should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.
- Identify external organisations such as the Modern Slavery Helpline, GLAA and the “Stronger Together” initiative.

## **Responsibility**

Responsibility for our anti-slavery initiatives is as follows:

- Policies and due diligence - the Group Managing Director
- Training, risk assessments and investigation - the HR Manager

This voluntary slavery and human trafficking statement is made in connection with section 54(1) of the **Modern Slavery Act 2015**.

## **Further Information**

The Company will review policies and procedures periodically to reflect changes in legislation and good practice.