

Modern Slavery and Human Trafficking Statement

INTRODUCTION

This statement sets out the actions all subsidiary companies of Kinaxia Logistics (“the Group”) will take to understand all potential modern slavery risks related to its business. Where necessary, the Group will put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2018 to 31 December 2018.

As part of the transport and warehousing industry, the Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

THE GROUP STRUCTURE AND SUPPLY CHAINS

1.1 This statement covers the activities of the Group:

1.1.1 The Group is a logistics company with its focus on transport and warehousing of products for external companies. There is no conventional “supply chain” as the Group does not carry out any manufacturing but it can be involved in picking and packing products stored in its warehouses.

1.2 Countries of operation and supply

1.2.1 The Group currently operates in the following countries:

1.2.1.1 All Group warehouses are located in the UK. Our main purchases include fuel, office equipment, uniforms, tyres and parts for vehicles that have been purchased or leased from European manufacturers.

1.3 High-risk activities

1.3.1 The following activities are considered to be at high risk of slavery or human trafficking:

1.3.1.1 If we don’t have sufficient staff of our own, typically drivers or warehouse staff, we will either use temporary agency staff or sub contract the work.

1.3.1.2 We have four main categories of employees: drivers, warehouse, workshop and administration. As we operate in the UK, whilst we might handle products imported by our customers, there is no scope for any of the Group's direct activities to be exposed to slavery or human trafficking.

1.4 Responsibility

1.4.1 Responsibility for the Group's anti-slavery initiatives are as follows:

1.4.1.1 **Policies:** The Group HR Manager is responsible for putting in place and reviewing policies and the process by which they are developed to ensure they meet all UK Employment Legislation requirements including the National Minimum wage.

1.4.1.2 **Risk assessments:** The Groups board have ultimate responsibility for human rights and that, within the local operations, the Senior Management team will maintain an ongoing assessment of the risk of exposure to modern slavery and human trafficking.

1.4.1.3 **Investigations/due diligence:** There are no known or suspected instances of slavery and human trafficking.

RELEVANT POLICIES

2.1 The Group will implement the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

2.1.1 **Whistleblowing policy** The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Group's whistleblowing procedure will be designed to make it easy for workers to make disclosures, without fear of retaliation.

2.1.2 **Employee code of conduct** The Group's code will make it clear to employees the actions and behaviour expected of them when representing the Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and managing its supply chain.

2.1.3 **Supplier/Procurement code of conduct** The Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Even though the Group does not manufacture anything are suppliers will be 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.

2.1.4 **Recruitment/Agency workers code of conduct** The Group uses only specified, reputable employment agencies to source labour and will verify the practices of any new agency it is using before accepting workers from that agency.

2.1.5 **Right To Work Policy** The Group has a duty to prevent illegal working and carries out relevant document checks to ensure each person we employ is legally allowed to do the work in question

DUE DILIGENCE

3.1 The Group will undertake due diligence when considering taking on new suppliers, and will annually review its existing suppliers.

TRAINING

4.1 All senior managers and HR Advisors within the Group have completed training on modern slavery as a module within the Managers Toolkit.

4.2 The Group's modern slavery training covered:

4.2.1 how to assess the risk of slavery and human trafficking in the Groups suppliers;

4.2.2 how to identify the signs of slavery and human trafficking;

4.2.3 what initial steps should be taken if slavery or human trafficking is suspected;

4.2.4 how to escalate potential slavery or human trafficking issues to the relevant parties within the Group;

4.2.5 what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;

AWARENESS-RAISING PROGRAMME

5.1 As well as training staff, the Group will raise awareness of modern slavery issues by distributing posters across the Group's premises, circulating a series of emails and adding this statement to the Group's employee self-service HR System.

5.2 The posters and emails will explain to staff:

- 5.2.1 the basic principles of the Modern Slavery Act 2015;
- 5.2.2 how employers can identify and prevent slavery and human trafficking;
- 5.2.3 what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Group; and
- 5.2.4 what external help is available, for example through the Modern Slavery Helpline.

APPROVAL

This statement has been approved by the Group's board of directors, who will review and update it annually.

Graham Norfolk

Peter Fields