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# Uniserve Group – Modern Slavery and Human Trafficking Statement

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## Introduction

This statement sets out the actions that Uniserve Group (“the Group”) undertakes, to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is a zero-tolerance approach to modern slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> January 2022 to 31<sup>st</sup> December 2022.

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 and is committed to the highest standards of ethical business behavior and treatment of the people that work for us and with us.

We seek integrity and transparency in all our business dealings and relationships and the following is the process by which the Group assesses whether particular activities or countries are at high risk in relation to slavery or human trafficking.

## The Group Structure

Uniserve are the largest British privately owned international freight and logistics company in the UK. Working with an unrivaled network of professional partners across the world. We are experts in all major Global trade markets and specialists in Europe, China, Southeast Asia, and the Indian Subcontinent.

The Uniserve Group is made up of the following companies which are controlled by the board of directors:

- GB Europe Holdings Limited
- Uniserve Holdings Limited
- Uniserve Limited
- James Kemball Limited
- Customs Insights Consultancy Limited
- Supply Chain Academy Limited
- Seafast Holdings Limited
- Seafast Logistics Limited
- Seafast Cold Chain PLC

- Express Global Distribution Centre
- City Global Administration
- Ellerman City Liners Limited
- Regional Freight Services Limited
- One World - Global Trade Management Limited
- Cromwell Manor (Functions) Limited
- Grand Events Holdings Limited
- Metro Shipping Limited
- Metro Global Holdings Limited

## Definitions

The Group considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property
- being physically constrained or having restrictions placed on freedom of movement.

## Commitment

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter-into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude, and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, Ireland, Europe, Asia, and China and in many cases exceeds those minimums in relation to its employees.

## Supply chains

The Group currently operates in the following countries United Kingdom, Ireland, Europe, Asia and China. Employees at these locations may fall into

one or all of three main categories of employees: drivers, warehouse staff and office staff. The Group also uses temporary agency staff, as the need arises. As we operate in the UK and around the world, whilst we might handle products imported or exported by our customers, there is little to no scope for any of the Group's direct activities to be exposed to slavery or human trafficking.

Our supply chain includes organisations within the e-commerce and retail sectors, of which we provided, warehousing, value-added processing, stock management, picking, packing, and despatch of products on behalf of customers to support their online trading activities (e-fulfilment) or on behalf of customers generally (non-e-fulfilment), as well as a variety of ancillary and traditional retail support services.

### **Potential exposure**

The Group considers its main exposure to the risk of slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

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### **Steps**

The Group carries out due diligence processes in relation to ensuring slavery and human trafficking does not take place in its organisation, including conducting a review of the controls of its suppliers.

The Group has not, to its knowledge, conducted any business with another organisation that has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

### **Responsibility**

The Group and its associated companies are committed to ensuring that its 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.

The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Groups supplier code of conduct will lead to the termination of the business relationship.

The Group ensures that all Overseas Partners (3rd party suppliers) who operate on behalf of the Group abide by the laws and relevant legislations. The group regularly reviews the agreements to ensure they remain compliant.

The Group undertakes due diligence when considering taking on new <https://ellermanlines.com/wp-admin/admin.php?page=real-cookie-banner-component> contracts and annually reviews its existing contracts. The Group has arrangements with 3rd party suppliers, who provide services, including recruitment and the supply of agency staff.

The Group has a preferred supplier list for recruitment agencies, which allows greater control over labour and agency staff. In this way, the Group ensures that any agencies used are fully compliant our policies and the current legislation.

Responsibility for the Groups anti-slavery initiatives is as follows:

- Policies: The Human Resources Department are responsible for putting in place and reviewing policies and the process by which they were developed.
- Risk assessments: The Group Operating Board members are responsible for human rights and modern slavery risk analysis.
- Investigations/due diligence: The Group Operating Board are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and explain their specific role.
- Training: The Group leads the way for staff development, with group members The Supply Chain Academy and CP Training being leading training providers, which, as well as serving the industry, are also used as a programmed in-house resource for the group.

## **Training and Awareness**

The Group recognises that knowledge is key, and all employees must complete the mandatory Modern Slavery training upon starting their employment and commit to preventing labour exploitation by completing

their new starter induction. The new starter induction includes the following aspects:

- How to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organization.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.

The Group publishes all policies and procedures on the Group's internet page to ensure employees are aware of not just the Group's responsibility, but their responsibility to raise any suspicions or evidence of potential slavery or human trafficking issues to the relevant parties within the organisation.

To ensure that the Group's employees understand the basic principles of the Modern Slavery Act 2015 and ensure that the Group is 100% compliant, it will continue to ensure that it and its 3rd party suppliers are compliant and that no Modern Slavery or Human Trafficking is taking place. The Group will raise awareness of modern slavery through regular reminders and by adding this statement to the Group's internet site.

### **Key performance indicators**

The Group reviews its key performance indicators (KPIs) to ensure that they are improving or to detect any issues that need to be addressed. As a result, the Group has taken steps to ensure that there are no breaches of Modern Slavery or Human Trafficking within the group, and its 3rd party suppliers. To date, there is no indication from employees, the public or Law enforcement agencies that Modern Slavery or Human Trafficking is present within the Group, its associated companies, or suppliers.

### **Policies**

The Group operates 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, all of which are accessible to all staff via the intranet:

- **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 organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's

whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Anti-slavery and Human Trafficking Policy** - The Group is committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- **Child Labour Policy** - The Group is committed to the principles of protecting children from child labour exploitation. The Group believes that their future development and that of the communities and countries in which they live is best served through education, not child labour.
- **Dignity at Work Policy** - The Group 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.
- **Recruitment Policy** - The Group and its associated companies uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Slavery Compliance Officer

The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

## Board approval

This statement has been formally approved by the Board of Directors of the Uniserve Group and signed on their behalf.



Paul Stone  
Group Human Resources Director Uniserve Holdings Limited  
Dated: 27<sup>th</sup> January 2023