

Modern Slavery & Human Trafficking Policy 2018/19

This statement sets out the actions of Russell Group (includes trading companies John G Russell (Transport) Ltd and Carntyne Transport Co Ltd.) to understand all potential modern slavery risks related to its business and to put steps in place that are aimed at ensuring 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 April 2018 to 31 March 2019.

As part of the logistics sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation 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.

1. Organisational Structure and Supply Chains

This statement covers the activities of Russell Group:

We are a UK registered Logistics business with many service provisions to our customers including Transport (Road, Rail), Warehousing, Contract Packing, International (Freight Forwarding), Contract Management, Onsite Logistics and Engineering.

2. Countries of Operation and Supply

Our business is predominantly domestic with limited International Operations involving Freight Forwarding of goods utilising subcontracted Transport.

3. Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows;

- **Policies:** Group Quality/HR Manager is responsible for preparing, implementing and reviewing policies designed to ensure that risks of breaches of the Modern Slavery and Human Trafficking policy are minimised.
- **Risk assessments:** The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Modern Slavery and Human Trafficking Policy, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Modern Slavery and Human Trafficking Policy
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our Modern Slavery and Human Trafficking Policy.
- **Investigations/due diligence:** Group Quality/HR Manager is responsible for investigations and due diligence in relation to known or suspected instances of slavery and

human trafficking, he/she will thoroughly investigate and report on any incidents and report the matter to Russell Group Board.

- **Training:** This statement along with our Modern Slavery and Human Trafficking Policy has been communicated to those staff with responsibility in any area of risk.

4. Relevant Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Subscription to SEDEX:** Sedex is a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. As the largest collaborative platform for sharing ethical supply chain data, Sedex is an innovative and effective supply chain management solution, helping you to reduce risk, protect your company reputation and improve supply chain practices.

Sedex has two main aims:

1. to ease the burden on suppliers facing multiple audits, questionnaires and certifications
2. to drive improvements in the ethical performance of global supply chains

The core product is Sedex Advance, a secure, online database which allows members to store, share and report on information in four key areas:

- Labour Standards
- Health & Safety
- The Environment
- Business Ethics
- **Recruitment Policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK, checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Sustainability Policy:** This policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- **General Standards:** Our employee handbook contains general standards of employee conduct and ethical behaviour.
- **Suppliers Code of Conduct:**
 - Russell Group manages its supplier policy by maintaining a preferred supplier list and conducting due diligence on suppliers before allowing them to become a preferred supplier. This Modern Slavery & Human Trafficking Policy is intended to form part of our contract with all suppliers, contractual or non-contractual, and they are required to confirm that no part of their business operations contradicts this policy.
 - In accepting contracts with or orders placed by any Russell Group company, suppliers confirm their compliance with this policy, signifying that:
 - They have taken steps to eradicate modern slavery within their business
 - They hold their own suppliers to account over modern slavery

- (For UK based suppliers) They pay their employees at least the national minimum wage
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate the contract at any time should any instances of modern slavery come to light.
- Russell Group only employ reputable companies to source labour and always verifies the practices of any new agency before accepting workers from that agency.

5. Due Diligence

Russell Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier which may be part of a more general human rights or labour rights assessment;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular, an example of which is our enrolment to the SEDEX programme.;
- using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; (SEDEX) and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

6. Performance Indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation will:

- require supply chain managers and HR professionals to be conversant with and understand the policies of the business;
- develop a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- review its existing supply chains expected to be completed by July 2019, whereby the organisation evaluates all existing suppliers.

7. Training

Russell Group requires supply chain managers and HR professionals to be conversant with and understand the policies of the business in relation to Modern Slavery and Human Trafficking;

Russell Group's modern slavery training covers:

- purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of

labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- 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 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 organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

8. Awareness-raising Programme

As well as training staff, the organisation will further raise awareness of modern slavery issues by including our relevant policies to the company handbook issued to every employee. These policies will include advice on;

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

9. Approval for this statement

This statement was approved by the Board of Directors on 5/04/2019

Name (Director) **Alan W Poulton CEO**

Signature



Date

5/04/2019

'Russell Group' includes trading companies John G Russell (Transport) Ltd and Carntyne Transport Co Ltd.