

Modern Slavery & Human Trafficking Policy 2017/18

This Policy is established pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Russell Group has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Russell Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

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

Our high-risk areas

Having looked at the potential for human trafficking within our supply chain operations we do not have any areas of the business that we would consider high risk. We rarely purchase goods, and in respect of purchase of services utilise a controlled number of reputable transport companies and a small amount of agency labour from reputable agency providers.

Our 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.

Our suppliers

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:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We intend to introduce training for our teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 2nd April 2018

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

Signature



Date

2/4/2018

'Russell Group' means John G Russell (Transport) Ltd and subsidiary or associated companies