

James Kemball – Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions that Uniserve Holdings, Uniserve Limited, Zenith Logistics Services (UK) Limited and James Kemball Limited (“the Group”) undertake, to understand all potential modern slavery risks related to its business and to put in place steps 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 1st April 2018 to 31st March 2019.

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 has a zero-tolerance approach to slavery, trafficking or forced labour in any part of our business and ensures that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

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

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 no scope for any of the Group’s direct activities to be exposed to slavery or human trafficking.

The following is the process by which the Group assesses whether particular activities or countries are high risk in relation to slavery or human trafficking.

Responsibility

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 Health & Safety Department are responsible for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The Human Resources Department 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.

Relevant 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.

Due diligence and Supply Chain

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 organisation's 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 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.

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 enforcements agencies that Modern Slavery or Human Trafficking is present within the Group, its associated companies or suppliers.

Awareness-raising programme

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.

The organisation's methods of raising awareness of slavery awareness include;

- 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 messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

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.

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: 5th March 2019