

James Kemball – Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions that Uniserve Holdings, Uniserve Limited, James Kemball Limited, Custom Insights Consultancy 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 July 2020 to 30th June 2021.

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.

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

The Group Structure

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

- Uniserve Holdings Limited
- Uniserve Limited
- James Kemball Limited

- Custom Insights Consultancy Limited
- Supply Chain Academy
- Seafast Limited
- Express Global Distribution Centre
- City Global Administration

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 to have restriction 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 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.

The Group 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.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Group welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2020/2021 in line with the original publishing requirements.

The Group concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

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 which 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 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 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.

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 enforcements 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 Groups 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: 2nd July 2021