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# MODERN SLAVERY & HUMAN TRAFFICKING

Policy



Maritime Transport LTD.

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# Modern Slavery & Human Trafficking Policy

## 1. STATEMENT

This statement sets out Maritime Transport Ltds (hereafter known as the Company) actions to identify all potential modern slavery risks related to its business and is committed to put into place steps that are aimed at ensuring that 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<sup>st</sup> January 2022 to 31<sup>st</sup> December 2022.

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

## 2. STRUCTURE & SUPPLY CHAINS

The Company is one of the leading transport and logistics operators in the UK, offering a wide range of supply chain services to its customers, including: container storage and transport, distribution and second hand HGV truck sales.

As a transport and logistics company, the main capital expenditure items are trucks, trailers and lifting equipment (and associated components) and fuel. All of the trucks, trailers and lifting equipment purchased are manufactured in the EU and they are serviced in the UK using original equipment manufacturers' parts supplied by the manufacturers. Fuel is purchased from UK providers. The Company's only other significant items of capital expenditure are: computer hardware, uniform, stationary and company cars, all of which are sourced from UK suppliers.

## 3. COUNTRIES OF OPERATION & SUPPLY

The Company currently operates in the UK only.

## 4. RISK ASSESSMENT

The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Location of country: Countries within the EC have the lowest regional prevalence of modern slavery in the world and are therefore considered to be low risk
- Adherence to Modern Slavery Principles: Whether those companies have either published Modern Slavery Act statements or have signed agreements confirming their adherence to modern slavery principles
- Size of company: The Company considers that the larger the company, the greater the likelihood that they will have more resources to monitor and police anti-slavery measures
- Age and reputation of company: The older the company and the more established their reputation, the greater the likelihood that they will wish to maintain their reputation and therefore, are less likely to be involved in slavery or human trafficking

## 5. HIGH-RISK ACTIVITIES

The Company considers that it does not currently engage in any activities directly where there is a high risk of slavery or human trafficking.

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## 6. RESPONSIBILITY

Responsibility for The Company's anti-slavery initiatives is as follows:

- Policies: Policies have been drafted, implemented and managed by an experienced team of managers who ultimately answer to the Chief Executive Officer. These policies are continually reviewed and periodically updated by its Risk and Compliance Department and its HR Department
- Risk assessments: Responsibility for human rights and modern slavery risk analysis lies with the Company's HR Director
- Investigations/due diligence: A dedicated HR Department is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and any suspected cases are promptly referred to the HR Director
- Training: All individuals involved in monitoring slavery and human trafficking risks have received appropriate training
- Market-related pay and reward: Remuneration is reviewed annually in line with settlements in the haulage and distribution sector. In addition to the payment of employer pension contributions and extra holiday entitlement, discretionary bonuses are awarded to long-serving employees

## 7. RELEVANT POLICIES/PRINCIPLES

The Company 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:

- Public Interest Disclosure policy: The Company encourages its workers, contractors and other business partners to report any concerns relating to its direct activities or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistle-blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation
- Employee code of conduct: The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain high standards of employee conduct and ethical behaviour when managing its supply chains
- Supplier/Procurement conduct: The Company is committed to ensuring that its suppliers adhere to high standards of ethics. When requested, suppliers are required to demonstrate that they provide safe working, treat workers with dignity and respect and act ethically and within the law in their use of labour. Serious violations of these principles will lead to the termination of the business relationship
- Robust recruitment and sub-contracting process: The vast majority of The Company's staff are recruited directly and in line with UK employment laws. 'Right to work' documents checks are conducted, contracts of employment are issued and checks conducted to ensure everyone employed is aged 16 and above. Where agency staff are required, only specified, reputable employment agencies are used and the practices of any new agency used are verified before accepting workers from that agency. Similarly, rigorous checks are expected when the Company engages the services of subcontractors

## 8. DUE DILIGENCE

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.

## 9. TRAINING

As part of managerial professional development, senior managers will complete training on modern slavery.

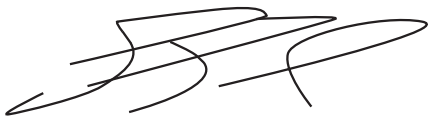
## 10. AWARENESS-RAISING PROGRAMME

As well as training staff, the Company will use other internal media to raise awareness of modern slavery issues, from time to time, by publishing articles on its intranet site ("iWave") and in its staff magazine ("Breaktime"). The articles explain to staff:

- 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 Company
- What external help is available, for example, through the Modern Slavery Helpline

## 11. BOARD APPROVAL

This Policy has been approved by the Board of Directors of Maritime Transport Limited who will ensure that it is reviewed and updated annually.



Simon Smart

Chief Executive Officer