

Modern slavery and human trafficking statement

This statement sets out Maritime Transport Limited's ("Maritime"/"the Company") actions to identify all potential modern slavery risks related to its business and to put in 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 6th April 2017 to 5th April 2018.

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

Maritime is absolutely committed to preventing slavery and human trafficking in its activities and to ensuring that its supply chains are free from slavery and human trafficking.

Structure and supply chains

This statement covers the Company's activities:

Maritime, a subsidiary of Maritime Group Limited, 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, warehousing 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 diesel 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.

Countries of operation and supply

Maritime currently operates in the UK only.

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, source: The Global Slavery Index), 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 with us confirming their Adherence to Modern Slavery Principles.
- **Size of company:** Maritime 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.

High-risk activities

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

Responsibility

Responsibility for Maritime'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 Group Managing Director. These policies are continually reviewed and periodically updated by its in-house solicitor, its Risk and Compliance Team, and its dedicated HR Department.
- **Risk assessments:** Responsibility for human rights and modern slavery risk analysis lies with the Company's HR and Risk and Compliance 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 and Risk and Compliance Director.
- **Training:** All individuals involved in monitoring slavery and human trafficking risks receive regular in-house 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.

Relevant policies/principles

Maritime 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:

- **Whistleblowing policy:** Maritime 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. Maritime's whistle-blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct:** Maritime's code makes clear to employees the actions and behaviour expected of them when representing the Company. Maritime strives to maintain high standards of employee conduct and ethical behaviour when managing its supply chains.
- **Supplier/Procurement conduct:** Maritime is committed to ensuring that its suppliers adhere to high 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. Maritime works with suppliers to ensure that they meet these standards and improve

their worker's working conditions. However, serious violations of these principles will lead to the termination of the business relationship.

- **Robust recruitment and sub-contracting process:** The vast majority of Maritime'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 Maritime engages the services of sub-contractors.

Due diligence

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

- mapping the supply chain broadly to assess particular product/service or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing, on a regular basis, all aspects of the supply chain based on the supply chain mapping;
- taking a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier 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.

Performance indicators

Maritime has reviewed its key performance indicators (KPIs). As a result, Maritime is:

- developing a system for supply chain verification, expected to be in place by mid-2018 whereby the Company evaluates potential suppliers and
- reviewing its existing supplier relationships and associated supply chains (expected to be completed by mid-2018).

Training

Maritime requires all managers and HR professionals within the Company to complete training on modern slavery and expects this training programme to be fully in place by mid 2018.

It is expected that Maritime's modern slavery training will cover the following:

- the Business's 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 or services 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 Company;
- 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 Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from Maritime's supply chains.

Awareness-raising programme

As well as training staff, Maritime 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 Maritime and
- what external help is available, for example, through the Modern Slavery Helpline.

Board approval

This statement has been approved by the Managing Director of Maritime Group Limited who has responsibility to ensure that it is reviewed and updated annually.

Group Managing Director's signature:



Group Managing Director's name:

John Williams

Date: 23rd November 2017.