

## MODERN SALAVERY POLICY

### Slavery and Human Trafficking in our Business

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all, of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

In tackling slavery and human trafficking in our business we seek to follow these steps:

1. Identifying areas of risk within our business and supply chain
2. Taking steps to mitigate those risks
3. Monitoring the ongoing effectiveness of our risk prevention
4. Annual training for all our office staff and managers
5. Protecting and encouraging whistle-blowers

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### RESPONSIBILITY FOR THE POLICY

Backline directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Manager has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

## COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, please raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on our website.

## COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### Recruitment of Temporary Workers

- All applicants who register for work with Backline Logistics Support Services must do so in person



- All applicants are interviewed face to face and any documentation is completed in sight of our trained staff.
- All Application Forms include questions and information relating to modern slavery
- Our staff are trained in spotting signs of modern slavery and in providing a safe environment for temporary staff to come forward with their concerns
- All workers are provided with a handout containing contact information for confidential support and resources about slavery and human trafficking

## Payment of Temporary Workers

- Payslips are always made available to the individual online
- All temporary workers are paid by BACS into their own bank account or that of their partners.
- All temporary workers are paid on a Friday for the previous weeks work
- No fee is charged, and no money is deducted from the temporary worker, for finding / placing any temporary worker in any client, and no deductions are made for any PPE that is supplied to the temporary worker by us.

## Shared Bank Accounts

Our Head Office based Compliance Teams interrogates our temporary workers database in order to identify any temporary workers who share the same bank account or address with other temporary workers on our payroll. Each case is individually investigated by our local branch personnel who will question the temporary workers in order to establish the reasons behind the shared bank accounts or addresses.

## Supplier Compliance with our Values

We have zero tolerance to slavery and human trafficking within our supply chain. To ensure that all our clients and contractors comply with our values we insist that our contacts incorporate a requirement to prevent and stop modern slavery.

We recognise that it is our clients who are best placed to spot the signs of modern slavery on a day-to-day basis and so we provide our clients with materials to assist them in spotting modern slavery.

We also have a dedicated compliance manager at Backline Logistics Support services and a compliance team at our parent companies head office, which relies upon the support of the following staff and departments egal, Audit & Compliance, Procurement, Sales and Training.

## Training

We believe that training is a fundamental tool in the fight against modern slavery. To ensure that all of our staff are aware of the risks involved, we deliver specific training to help our staff spot signs of modern slavery and provide a safe environment for temporary staff to come forward with their concerns.

## BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Whistle – Blowing

Should any member of Backline Logistics Support Services staff regardless of their position, have any concerns that they are subject to or have been subject to or suspect someone is subject to modern slavery or human trafficking then they are to inform their manager as soon as possible.

If you do not feel confident to do this then you are encouraged to write to [paul.church@backlinelogistics.co.uk](mailto:paul.church@backlinelogistics.co.uk) or [mark.gooden@backlinelogistics.co.uk](mailto:mark.gooden@backlinelogistics.co.uk) to raise your concern. This will be treated in the strictest of confidence and no retribution of any sort will be held against you.

## Statement

**This statement is made pursuant to section 54(1) of the modern slavery act 2015 and constitutes our slavery and human trafficking statement.**

Signed: *Mark Gooden*

Print name: Mark Gooden

Position: Commercial Director

Date: 22/05/2023