

DELAMODE GROUP

MODERN SLAVERY

STATEMENT



delamode
International Logistics

FEBRUARY 2018

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. Modern Slavery can take many forms, including the trafficking of people, forced labour, servitude and slavery. 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.

The Delamode Group takes a zero-tolerance approach to modern slavery and we are committed to acting professionally, fairly and with integrity in all our business dealings and supply chain relationships, wherever we operate - implementing and enforcing effective policy's and processes to uphold ethical standards and to combat modern slavery and human trafficking.

The Statement covers the business activities of the Delamode Group, which are as follows:

The transport of goods via road; rail, sea and air; warehousing and logistics; and transport support services (supply of fuel cards, ferry crossing bookings, insurance, roadside assistance, GPS products and procurement of vehicle consumables)

We have a long-standing policy that we do not use or accept forced, bonded or involuntary prison labour or child labour. We only work with people who choose to work freely. We respect the right to equal opportunity and freedom of association.

Delamode maintains a number of key processes and activities to ensure compliance to the Modern Slavery Act:

The company is committed to ensuring that there is no contravening of modern slavery or human trafficking within the business and/or the services delivered. As part of our commitment to combating modern slavery, we have the following policies within our organisation:

Employee Company Handbook: The company handbook outlines the practices and procedures Delamode expects employees to follow.

Employee Code of Conduct: Delamode expects the highest ethical standards from employees and other personnel in carrying out its business. The document provides employees with guidance on the standards expected when conducting business on behalf of the Delamode Group.

Whistleblowing Policy: Through our whistleblowing policy we openly encourage all employees, and associated stakeholders, who have serious concerns about an employee's conduct, to come forward and report any concerns.

Anti-Bribery Policy: This policy outlines the Delamode Group's commitment and expectation to prevent all risks related to bribery and corruption.

COMMUNICATION AND TRAINING

Where appropriate, we will educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chain. Through, inductions and training workshops and ad hoc monitoring of suppliers, employees are encouraged to identify and report any potential breaches of this anti-slavery and human trafficking policy (or any other Group policy).



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DUE DILIGENCE

To avoid the risk of slavery and human trafficking occurring within our supply chain we make sure that our employees, suppliers and partners are aware of our key policies and encourage them to adhere to the same high standards. These policies have been developed and adopted by Delamode Group in order to ensure that we conduct our services in an honest and ethical manner, at all times. Our suppliers are vetted and their ethical practises are reviewed to ensure they meet Delamode's high standards of ethical business practise.

RAISING CONCERNS

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

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

If it is believed or suspected that a breach of this policy has occurred, or that it may occur, employees are encouraged to notify their Line Manager and/or Compliance Manager, or report it in accordance with our Whistleblowing Policy as soon as possible.

If an employee is unsure about whether an act, the treatment of staff, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they should raise their concern with their Line Manager and/or the Compliance Officer, or report it in accordance with our Whistleblowing Policy as soon as possible.

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 that no employee experiences any detrimental treatment if 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 chain.

