

# MODERN SLAVERY

February 2026

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that the Gregory Group has taken to ensure that modern slavery and human trafficking is not taking place in any part of the service we provide, or our supply chain.

## Organisation Structure

The group companies consist of Gregory Distribution Ltd, ARR Craib Transport Ltd, Pollock (Scotrans) Ltd and Hayton Coulthard Transport Ltd (50:50 Joint Venture). This statement is made on behalf of the whole group. The group operates across a broad range of transport types. It employs around 3,000 people across over 50 sites. It services a diverse range of customers across many market sectors. As a business we only operate in the UK, we have a very limited number of overseas suppliers and we outsource only a minimal part of our business. Due to the nature and structure of our business, we assess ourselves to be at relatively low risk of modern slavery.

## Our commitment to preventing Modern Slavery and Human Trafficking

We are committed to ensure that no forms of modern slavery or human trafficking occur in any part of our business or supply chains. We undertake all reasonable and practical steps to ensure that our standards are implemented and that local legislation and regulations are being complied with, both throughout our business, and within our direct supply chain. We strive to work only with those parties who fully comply with these standards and will deal with issues of non-compliance on a case by case basis.

## Policy and Procedure

The Group has a range of policies, procedures, and contractual requirements in place that underpin the prevention of slavery and human trafficking within our organisations and supply chains. These include but are not limited to:

- Robust Disciplinary and Grievance Policies;
- Equal Opportunities and Dignity at Work Policy;
- Safeguarding Policy;
- Whistleblowing Policy to encourage all staff to report concerns internally;
- Provision of an Employee Assistance Programme so employees may seek advice and support;
- Clear recruitment procedures and systems which are designed to ensure that all prospective employees are legally entitled to work in the UK.
- Clear processes and action plans to ensure all our employees meet all requirements under National Minimum Wage Act;
- The company is certified by Ecovadis , which assesses our performance across labour and human rights, ethics and modern slavery.
- Acknowledging requirements in our commercial and supplier contracts; and continued engagement of external providers and suppliers who have their own policies and procedures aimed at preventing modern slavery and human trafficking.
- Our Group Risk and Internal Audit Committee regularly reviewing the risks facing our organisation which include risks in relation to modern slavery and human trafficking.



## **Our Suppliers**

Our supply chain features various suppliers covering all aspects of the service we provide including, for example, suppliers of agency staff, vehicle components/consumables, facilities maintenance and utilities. We require our supply chain to take responsibility for Modern Slavery matters.

## **Embedding our Values**

Our Modern Slavery and Human Trafficking Statement is circulated and available throughout the Gregory Group, and it is the responsibility of all employees to uphold. Any employee who fails to comply with this statement will face disciplinary action up to and including dismissal. We encourage all employees to be vigilant and report any suspicions of any acts or behaviours that may contradict this statement to their Manager.

We will further embed our commitment to the principles of the Modern Slavery Act 2015 by:

- Continuing to develop and embed “The Gregory Group Way” which is a set of behaviours covering how we expect our employees to act;
- Supplying awareness training and awareness campaigns about modern slavery;
- Ensuring all new employees receive a briefing about the company’s approach and expectations to modern slavery during induction;
- Our internal audit regime audits our policy and procedure;
- Ensuring that when we undertake a review of relevant people policies, they include the consideration and prevention to reduce the risk of modern slavery;
- Ensuring that when we undertake a review of contractual terms for both customers and suppliers, they include consideration and prevention to reduce the risk of modern slavery;
- Continuing to develop new ways to raise our employees awareness and report any suspected case of modern slavery or human trafficking.
- Partnering with an Agency Supply Management Company which will adopt practices to tackle worker exploitation.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors on 11 February 2025. The financial year ended on 4 October 2025.