



FORTH PORTS LIMITED

Statement of Forth Ports Limited on behalf of the Forth Ports Group in relation to Modern Slavery and Human Trafficking

This statement is made pursuant to section 54(6) of the Modern Slavery Act 2015 (the “Act”) and constitutes the Group’s slavery and human trafficking statement for the financial year ending on 31 December 2023.

OUR BUSINESS

Forth Ports Limited is the parent company of the Forth Ports Group (the “Group”). The Group owns and operates eight commercial ports in the United Kingdom (Tilbury, Grangemouth, Dundee, Leith, Rosyth, Methil, Burntisland and Kirkcaldy) and is a key employer in these local communities with a workforce of over 1,000 people. We offer customers a wide range of port-related services and help connect the UK with Europe and the rest of the world. This group statement is made in respect of Forth Ports Limited (parent) and Port of Tilbury London Limited (subsidiary). Further details of the Group can be found at www.forthports.co.uk.

The Group fully supports the aims of the Act and has zero tolerance of slavery and human trafficking in all its different forms in any part of its business and in its supply chain. The Group is committed to operating in an ethical manner in all of its business activities.

OUR APPROACH

The Group takes its social responsibility seriously and is committed to conduct business in compliance with the highest ethical standards. The Group supports and is committed to upholding the UN Guiding Principles on Business and Human Rights and is committed to developing its approach and practices so that it can detect and eradicate any non-compliant activities within its business and supply chain.

OUR SUPPLY CHAIN

The Group’s supply chain is extensive and wide ranging reflecting the diverse nature of its operations. A large number of suppliers provide a range of goods and services to the Group.

Our supply chain can be broken down into the following procurement categories and related services:

- Third party direct labour: access to a flexible workforce to service the needs of our customers and keep goods moving;
- Haulage: moving goods within the port estate and to off-site storage locations;
- Support services: quayside contractors, stevedores and other business support services such as IT, HR including Talent Acquisition, finance, marketing, communications and compliance related services;
- Utilities: supply of electricity, gas, fuels and water, waste removal services, renewable energy generation, metering, and related consultancy;
- Construction projects: planning applications, design, engineering, project management, construction delivery and related services (e.g. quantity surveying support, ecological mitigation);
- Port specific equipment: leasing and purchase of plant and equipment for lifting and transporting materials on the quayside, and marine equipment;
- Maintenance, overhaul and repair of equipment: sourcing spares and tools for equipment maintenance, routine servicing, repairs and overhauls of the Group’s assets; and
- Property and facilities management: property, technical, legal and facilities management services.

MODERN SLAVERY RISK WITHIN OUR BUSINESS AND SUPPLY CHAIN

The Group operates within the UK which is generally considered to be a low risk jurisdiction for instances of modern slavery, however our business activities and supply chain encompasses areas of higher risk. The Group has procedures in place to identify, monitor and assess categories of third party spend most at risk from slavery and human trafficking. The key risks include:

- Entry into the UK: ports can be used as entry points into the UK for human trafficking;
- Vessel crews: vessels originating from higher risk jurisdictions may have crew members who are forced to work in conditions which would constitute modern slavery under the Act;
- Facilities services: the Group engages with various agencies to deliver cleaning and security functions across the business which inherently carry a risk given the Group is not employing those individuals directly;
- Quayside services: the Group procures stevedoring and other quayside services across its ports with some services being provided by agencies;
- Construction: the Group continually works to upgrade and develop its port facilities often involving contractors in major projects. The UK construction industry is a target for modern slavery activities through the exploitation of vulnerable workers and the procurement of raw materials from higher risk jurisdictions; and
- Port equipment: the Group sources some of its key equipment such as cranes from outside the UK, parts of which may be manufactured in higher risk jurisdictions where there is limited protection for vulnerable workers.

MITIGATING RISK THROUGH EFFECTIVE SUPPLY CHAIN PROCEDURES

The Group has a responsible procurement policy in place which sets standards that it expects suppliers to adhere to. This is issued to suppliers as part of our supplier welcome pack as well as within standard contract forms for new contracts to ensure suppliers are able to demonstrate compliance with the Act. In order to further mitigate the risk of modern slavery, human trafficking and other human rights abuses within our supply chain we have the following procedures in place:

- We stipulate that all suppliers must have a Modern Slavery Statement or agree to adhere to ours;
- We perform contractor audits which include a review of evidence that employees are eligible to work in the UK;
- We use an external supplier risk assessment platform to assist with risk profiling for new and existing suppliers;
- For equipment sourced from higher risk jurisdictions, additional measures are put in place such as in-person visits by our own staff or the commissioning of external due diligence reports;
- For suppliers who employ non-UK employees we ask for citizenship rights/visas where applicable and request additional assurances that they are monitoring for signs of human rights abuses; and
- We have port specific security arrangements in place. Our port operations are within ISPS (International Ship and Port Facility Security) Code zones which comply with the Code's framework to implement preventative security measures. The Group's ports also have AEO (Authorised Economic Operator) status which is achieved through demonstrating compliance with a number of security procedures, aimed at ensuring the safety and security of goods within our ports.

The Group's procurement department has attained the Certificate of Achievement in Corporate Ethical Procurement & Supply from the Chartered Institute of Procurement & Supply ('CIPS'). This is a rigorous exam based assessment for all procurement staff and is required to be recertified on an annual basis. This ensures every member of our procurement team has an understanding of the three key topics covered: 'Environmental Procurement', 'Human Rights' and 'Fraud, Bribery and Corruption'. As a result of this accreditation, we are also listed on the CIPS Ethical Register.

OUR POLICIES AND CONTROL ENVIRONMENT

The Group has a defined set of company values which underpin everything that we do. We seek to promote a business culture that is open and honest and allows opportunities for staff, customers, suppliers or individuals to give feedback if expected standards are not being met. To tackle slavery and human trafficking in our business or supply chain, the Group has a number of internal policies in place. These include:

- Business Ethics and Conduct Policy: a policy applicable to all employees outlining the Group's commitment to doing business in a fair and transparent way;
- Procurement Policy: in relation to the sourcing of and engagement with suppliers as referred to above;
- Specific contractual provisions for suppliers in the Group's standard form of contracts as referred to above;
- Whistleblowing Policy: a policy which provides a way for employees and others to report anonymously any wrongdoing or concerns they have via a confidential third party; and
- Recruitment policies and procedures, including:
 - ensuring employees have the 'right to work' in the UK
 - pre-employment checks to verify identity and age
 - ensuring a contract of employment is in place prior to start of employment
 - ensuring employee names match bank account details provided.

As a Group we have high employment standards to comply with relevant employment, health and safety and human rights laws to ensure our employees are safe and secure when at work.

COMMUNICATION, TRAINING AND AWARENESS

We are committed to ensuring our employees understand and are compliant with our approach to preventing modern slavery and human trafficking. The Group has provided the following training and communication on our Modern Slavery Statement:

- The CEO has written to every employee emphasising our commitment to preventing modern slavery and human trafficking – a copy of this letter is provided to every new start at induction;
- All new employees, agency workers and contractors are briefed on our Modern Slavery Statement as part of their induction and this statement is available on our website;
- All leadership roles and those that are involved in procurement activities on behalf of the Group complete an e-learning module to ensure a high level understanding of the risks of Modern Slavery and Human Trafficking in our supply chain and business, alongside the relevant policies;
- Group-wide refresher campaigns take place at least annually and include an update of the risks of slavery and human trafficking, information on how to spot red flags and report any non-compliant activities or practices in the business or its supply chain. These can be in the form of toolbox talks, poster campaigns or e-learning modules; and
- We are members of Scotland Against Modern Slavery (SAMS), a partnership of businesses working with the Scottish Government to help eradicate human trafficking and modern slavery.

OUR ONGOING COMMITMENT

We recognise that the risk of modern slavery within our business and supply chain is not static and that those who profit from the exploitation of vulnerable people will continue to seek ways to do so. We are committed to continually evolving our policies so they are fit for purpose and to reporting this commitment through the Group's Annual Report.

This statement has been approved by the Forth Ports Limited Board of Directors on behalf of the Group and covers both Forth Ports Limited and Port of Tilbury London Limited.

Carole Cran
Chief Financial Officer