Modern Slavery Statement and Policy 2023

1.0 Introduction

1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that The Swain Group and subsidiary companies (the "Company") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

2.0 Our business

2.1 Road Haulage, Transports and Storage.

Our operating subsidiaries are:
R.Swain & Sons which operates from Rochester, Kent and other locations in England.
Swain Lifting Solutions which operates from Gatwick, Surrey.
Hallet Silbermann which operates from Hatfield, Herts.
MHL which operates from Rochester, Kent.
Express Freight which operates from Tilbury, Essex.
Eurobulk which operates from Rochester, Kent.
Ebbsfleet Transport which operates from Rochester, Kent.
Proctors Transport Ltd which operates from Langar, Nottinghamshire.
W Coy & Sons Ltd which operates from Langar, Nottinghamshire.

3.0 Policy Statement

3.1 We operate a number of internal policies to ensure due diligence in relation to slavery and trafficking to ensure that we are conducting business in an ethical and transparent manner. We have a zero tolerance approach to modern slavery and will not allow any person or company that we employ to work to any lower standard.

4.0 Application

4.1 This policy applies to all employees, agency workers, volunteers, interns, consultants, contractors and business associates.

5.0 Our Policy

5.1 We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

5.2 We encourage and welcome any employees raising concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

5.3 We conduct our business in an ethical manner and have clear guidelines and policies on how we expect our employees and suppliers to act.

6.0 Supply Chains

6.1 The Company operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all major suppliers before allowing them to become an approved supplier. This due diligence includes online searches, questionnaires and on site audits (if applicable) which specifically require them to confirm that they have:

a. Taken steps to eradicate modern slavery within their business
b. They hold their own suppliers to account over modern slavery
c. They pay their employees at least the national minimum wage / national living wage (as appropriate)

7.0 Training

7.1 The policy is part of our Induction Process and in addition we periodically conduct training with our employees so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

8.0 Responsibility

8.1 The Board of the Company is responsible for the full application of this policy. The HR and Compliance Managers are responsible for the day to day application.

9.0 Approval for this statement

9.1 This statement was approved by the Board of Directors.

Name: M. Deer (Managing Director)

9.2 This policy will be reviewed on an annual basis.



Signed: Matthew Deer – Managing Director
(1 June 2023)