

Introduction

Tuffnells (the “**Company**”, “**we**” and “**our**”) is a leading parcel courier offering national next-day collection and distribution services, specialising in the movement of items of irregular dimensions and weight (IDW), examples of which include bulky furnishings, packaging and automotive parts. With a mix of local and national customers, we offer a range of timed services, responsive to customer demand, via our network of 33 UK-based depots.

Our Anti-Slavery Position

We remain fully committed to operating fairly, legally and ethically at all times. Part of our commitment is to raise awareness of and prevent acts of modern slavery and human trafficking from occurring within our business, and we expect the same high standards from all third parties with whom we conduct business with – customers, suppliers, sub-contractors and agency providers. We take a zero-tolerance approach to non-ethical practices and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, implementing and enforcing effective systems to uphold ethical standards and to combat modern slavery and human trafficking.

“Modern Slavery” for us means the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude, including human trafficking. Management, team members and partners are alert to the risks of modern day slavery and we have a reporting line to bring any concerns to the attention of management who will act on all reports.

We expect anyone who has any suspicions of modern slavery in our business or our supply chain to raise their concerns without delay.

Our Operating Model

We conduct our business via a network of 33 UK-based operating depots and two office facilities, including our head office in Sheffield. Our service is the collection and delivery of IDW freight to a consumer base made up of both business-to-business and business-to-consumer customers. The vast majority of our collections and deliveries are completed before midday, with an overnight operation servicing our trunking and sort operation, requiring a dedicated work team of both full-time and contract shift workers.

Our supply chains are mainly made up of the following:

- suppliers of temporary agency workers, personal protective equipment workwear and consumables;
- third-party suppliers providing digital services and solutions, both for internal and external use; and
- contracted maintenance services, including the provision of cleaning, general building maintenance and vehicle provision and upkeep.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence and risk assessment

To help identify and monitor the risk of slavery and human trafficking in our supply chain we are reviewing our processes, which includes the vetting of suppliers and sub-contractors in order to ensure their adherence to anti-slavery and human trafficking practices.

Our standard legal terms with customers, suppliers, sub-contractors and agency providers include specific provisions which place clear obligations on the third party to adhere to all the relevant legislation and to uphold the required standards.

Effectiveness in combating slavery and human trafficking

In 2022, we continued to raise awareness and train our team members of modern slavery and how to spot and report signs of concern.

Inclusion of these metrics will aid us in measuring risk and support our progression to attain ISO 9001, 14001 and 45001 quality certifications.

We will carefully monitor the sources of our workforce, and our employment policies support the individuals' right to offer their services in exchange for a fair wage. We have strict policies and processes to regulate how we deal with both recruitment agencies for the supply of resource and service providers who undertake partnered collection and delivery services on behalf of Tuffnells, with the focus on an individual's right to work in the relevant jurisdiction and ensure fair and transparent payment practices. We adhere to the minimum wage provisions and additional provisions applicable to night workers in respect of maximum weekly working hours and rest breaks.

Policies

As part of our commitment to combating modern slavery, we have implemented the policies listed below.

- Anti-Corruption Policy;
- Dignity at Work Policy;
- Modern Slavery Policy; and
- Whistleblowing Policy.

We have a process of communicating our policies (new and revised) to ensure all of our team members are properly informed.

These policies have been developed and adopted by Tuffnells in order to ensure that we conduct all business in an honest and ethical manner.

Our Governance

We recognise that Modern Slavery is not something that only happens elsewhere and note that the UK Government estimates there are tens of thousands of people in slavery in Britain today, with UK nationals making up the biggest group of potential victims. As such, the Risk and Governance function helps increase awareness, training and support relating to modern slavery and human trafficking.

Training

The Company is committed to training relevant team members in how to identify Modern Slavery in practice and how to respond. We're committed to having a clear and transparent Company statement which is reviewed regularly and is communicated to team members.

Working with our delivery partners

We believe that we should work with third parties in a collaborative manner and we believe in constructive engagement through education and training programmes, coupled with capacity building, both internally and within our partnerships to identify and address any problem. While we recognise the reputational dangers of non-compliance within such partnerships, we believe that it is more beneficial to work for change and improvement rather than removing a partner and leaving the abuse unresolved. However, if sufficient progress is not made by the relevant third party, then Tuffnells may have the option to terminate its commercial relationship with that third party and will be without prejudice to the rights and remedies that we may have accrued up to the date of termination.

Further steps

We intend to take further steps to increase awareness within our business of modern slavery. This will include targeted communications and more in depth audits of high risk partners, e.g. providers of temporary agency workers.

Concluding Remarks

This statement has been approved by the Tuffnells Executive Board and is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Tuffnells' modern slavery and human trafficking statement for the 2022 financial year (1 Jan. 2022 – 31 Dec. 2022).

Michael Holt
Chairman

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