

Statement for Financial Year 2024-2025

Supreme Freight Services Ltd Modern Slavery Statement

Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Supreme Freight Services Ltd pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement for the financial year ending July 2024. It sets out the actions and activities during the financial year and steps taken by Supreme Freight Services Ltd to prevent modern slavery and human trafficking in our own operations and supply chains.

Our Business and Structure

Supreme Freight Services Ltd is a leading international shipping and forwarding agent. Established in 1986 as a family-operated business, we have now been handling international shipments for over 30 years. We import and export freight via air, road and sea and have customers in the United Kingdom, Europe and Asia.

Supreme Freight Services Limited is privately owned and has its head office in Southampton with regional offices in Felixstowe, Heathrow, Hong Kong, Guangzhou and Shenzhen.

We have a team of 74 professional industry experts (based in the UK) working with our customers to understand every detail of their shipping needs so that we can create a tailor-made solution that is truly bespoke.

Our Supply Chains and Due Diligence Process

Supreme Freight Services Ltd contracts with customers and suppliers, (including agencies who provide labour) and our supply chains include receipt of goods direct from manufacturers, customers and their contractors for onward shipment/delivery.

Our supply chain comprises of organisations within the UK and worldwide. We recognise that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we mandate our suppliers to prevent and avoid slavery and human trafficking in their supply chains, including in these higher risk countries.

We are committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business and to act ethically and with integrity in all of our business relationships. We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers. We continually review, implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or supply chains.

The scale of these supply chains, upstream and downstream, gives us the opportunity to promote respect for human rights and to make a positive impact on people's lives.

To ascertain and to mitigate the risk of working with a supplier or contractor who may have slavery in their supply chains we will continue to conduct due diligence and reviews as follows:

- all new contractors or suppliers have to be pre-qualified through a series of audits and we have now included Modern Slavery Act compliance into that on-boarding process.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier by conducting a risk assessment for each supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating an annual risk profile for each supplier.
- continually monitor potential risk areas, list low risk areas and areas considered higher risk and what we are doing about it.
- educate and inform our employees of the type of factors to look out for when dealing with workers (permanent or temporary) in our supply chain who may be subject to undue influence and how to report this.

- protect anyone who whistle blows.

Based on conducting our due diligence practices we currently consider all of our operations and suppliers to be low risk.

We expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation and to conduct the same level of commitment to the Modern Slavery Act as we do. To ensure this we conduct regular reviews on our existing suppliers to ensure they remain compliant with the Act and conduct risk assessments on all new suppliers to ensure compliance.

Supplier Risk Assessments

When conducting supplier risk assessments the following key factors are assessed:

- Vulnerable populations/geographic location
- Specific products and services and the raw materials and resources used
- Governance in place
- Recruitment process

As part of our procurement process, we will only engage with suppliers and contractors who confirm their compliance with the Act. We will write to our suppliers to raise awareness and seeking their confirmation of compliance with the Modern Slavery Act 2015.

As part of our ongoing commitment, Supreme Freight Services Ltd will continue to monitor existing and new suppliers to ensure compliance with the MSA and Supreme Freight Services Ltd own stringent controls. It remains a condition of doing business with Supreme Freight Services Ltd that suppliers respect the letter and spirit of the Modern Slavery Act.

To this end, all new contracts and those renewing, now include a clause requiring that our suppliers, and their subcontractors, comply with the Act, and include Supreme Freight Services Ltd right to terminate in the instance of any breach of this obligation.

Supreme Freight Services Ltd has Supplier and Procurement Policies and a Code of Conduct in place to reinforce this statement.

- We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Within our own operations

Supreme Freight Services Ltd takes the following steps to ensure there is no slavery or human trafficking within its own operations:

Adherence to relevant employment legislation, promotes human rights and largely prevents modern slavery. Supreme Freight Services Ltd has a responsibility to ensure that workers are not being exploited, that they are safe at work and that relevant employment, health and safety and human rights laws are adhered to. Employees and contractors are able to raise a suspected case of slavery or human trafficking within the Company's own operations by following the Company's internal Whistleblowing Policy.

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave the Company's employment. Employees are free to serve notice at any time.
- The Company carries out verification of an employee's identity and ongoing right to work in the UK and does not seek to withhold any of an employee's identity documents or passport etc.
- The Company pays all its employees at least the national minimum wage and adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.

- We comply with or provide enhanced versions of all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.

Furthermore, in this financial year we have also taken the following steps:

- We have worked with industry bodies to work on best practices on modern slavery, and then we have embedded that into our own policies and working practices.

Policies on Modern Slavery

We have a Modern Slavery Policy that 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. This policy is reviewed on an annual basis and updated where required in line with any changes in the law/regulations.

We also consider the following policies give us strength in avoiding modern slavery or human trafficking under the Act in our business:

- Anti-Bribery
- Business Code of Conduct
- Equal Opportunities & Diversity
- Harassment & Bullying
- Public Interest Disclosure (Whistleblowing)
- Suppliers and Procurement Code of Conduct
- Employee Code of Conduct

In addition, Supreme Freight Services Ltd has a Recruitment Policy and Process to ensure all checks and practices are followed correctly. The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency.

In the UK, a requirement to comply with the Modern Slavery Act 2015 will be contained in our updated supplier contracts and existing suppliers will be required to comply on renewal.

Measuring effectiveness

To date we have not had any instances of modern slavery or grievances related to modern slavery. We do have policies and procedures in place should any of these instances arise. We use a reporting mechanism which details any breaches of our policies, sets out the number of suppliers we have and their commitment to the modern slavery act and progress against our commitments to eradicate modern slavery. These reports are shared with the Board of Directors who have a strong overview of risks and effectiveness. We also monitor data pertaining to the training of our employees and suppliers on modern slavery.

Performance indicators

We have in place the following key performance indicators (KPIs) and these indicators and activities are reviewed at least annually.

A system for supply chain verification has been developed, whereby we evaluate potential suppliers before they enter the supply chain.

Supplier engagement:

- 100% of our suppliers to have agreed to the Supplier Code of Conduct.

Modern slavery training:

- Ensure that 100% of all existing and new employees, and contractors complete the modern slavery training.
- Ensure that 100% of employees who have roles dealing with suppliers, such as the Procurement Team receive ongoing updates and notifications regarding business & human rights, and specifically modern slavery.

Training

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking across our business we have trained relevant members of staff and our Anti-slavery Policy is available to all staff.

In addition:

- We provide role specific training sessions for employees who have engagement with suppliers, such as the Procurement and Facilities Teams, to help them understand the risks of human trafficking and how to spot potential dangers through both the initial supplier on boarding process and subsequent supplier reviews and assessments.
- We continue to provide mandatory modern slavery training which is compulsory for all employees, including contractors, and all new starters to the company will be asked to complete this as part of their induction process.

Training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Endorsement

We wholeheartedly endorse the legislation as a crucially important development in tackling slavery and human trafficking and we will not trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly.

We do not tolerate any conduct that contributes to, encourages or facilitates, human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

The board of directors have all approved this statement and appointed a Director to be responsible for it. The board are fully committed to ensuring no aspect of modern slavery or human trafficking is part of its business operations or its supply chain operations.

A handwritten signature in black ink, appearing to read "Ashley Archdeacon".

Ashley Archdeacon
Director
01/08/2024