Metro Shipping - Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions that Metro Shipping undertakes, to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is a zero-tolerance approach to modern slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st January 2022 to 31st December 2022.

Metro Shipping recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is committed to the highest standards of ethical business behaviour and treatment of the people that work for us and with us.

We seek integrity and transparency in all our business dealings and relationships and the following is the process by which Metro Shipping assesses whether particular activities or countries are at high risk in relation to slavery or human trafficking.

Metro Shipping is at the cutting edge of global supply chain solutions. We are engaged in the complete range of logistics services in several key verticals, including but not limited to automotive, retail, foodstuffs, chemicals, and projects. Metro operates to the highest industry standards, which can be recognised by the various accreditations we hold, including but not limited to ISO9001, ISO14001 and AEOF.

At the foundation of our business are ethical underpinnings that govern how we operate. We are an environmentally conscious business, as indicated by our ISO14001 accreditation. Due to the size of our company and its continuous growth since its inception in 1980, we feel it is important that we endeavour to minimise the impact we have on the environment through the implementation of an Environmental Management System. Therefore, it is unsurprising that we take a zero-tolerance approach toward modern slavery and human trafficking as such acts are a gross violation of fundamental human rights. We have several due diligence procedures in place to ensure that our ethical standards are met by our business and our suppliers & partners.

Definitions:

Metro Shipping considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property
- being physically constrained or having restrictions placed on freedom of movement.

Commitment:

Metro Shipping acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Metro Shipping understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Metro Shipping does not enter-into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude, and forced or compulsory labour.

No labour provided to Metro Shipping in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Metro Shipping strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, Ireland, Europe, Asia, and China and in many cases exceeds those minimums in relation to its employees.

Our Supply Chains and Supplier Adherence to Our Values

Over the last 40 years, we have developed strong relationships with our suppliers and continue building and developing new and existing relationships to our mutual benefit. To date, no instances or indicators of modern slavery have been recorded or found in our business. We continue to drive our high standards throughout our business and supply chain. As a global company, we transact with many companies and ensure this area is covered in the due diligence we perform as a company. New suppliers are risk assessed and asked to complete a Quality Assurance Questionnaire, which helps us establish their compliance in respect of this matter, thus minimising or eliminating the risk of slavery and human trafficking occurring within our supply chain.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that modern slavery and human trafficking do not occur in our supply chain or any part of our business by upholding the highest ethical standards. We strongly support the government's objectives to prevent modern slavery and human trafficking. We seek only to use suppliers once satisfied that they meet a certain standard on our Quality Assurance Questionnaire.

Due Diligence Process for Slavery and Human Trafficking

Potential exposure:

Metro Shipping considers its main exposure to the risk of slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps:

Metro Shipping carries out due diligence processes in relation to ensuring slavery and human trafficking does not take place in its organisation, including conducting a review of the controls of its suppliers. Metro Shipping has not, to its knowledge, conducted any business with another organisation that has been found to have involved itself with modern slavery.

As part of our initiative to identify and mitigate risk we:

- Identify and assess potential risk areas when taking on new suppliers by implementing our Quality Assurance Questionnaire.
- In turn, this mitigates the risk of slavery and human trafficking occurring in our supply chains.
- Continuously monitor potential risk areas in our supply chains.

Key Performance Indicators

We review a variety of key performance indicators (KPIs) to ensure that they are improving or to detect any issues that need to be addressed. As a result, we have taken steps to ensure no breaches of Modern Slavery or Human Trafficking within the company or our 3rd party suppliers.

There is no indication from employees, the public or Law enforcement agencies that Modern Slavery or Human Trafficking is present within any of our relationships, associated companies or suppliers.

Given all the above, we consider our exposure to the risk of slavery/human trafficking to be minimal. However, we have taken all necessary steps both internally and with those we have dealings with externally to ensure such practices do not occur.

We do not employ any temporary or agency staff, and all employees go through mandatory training in this area as set below.

Risk Assessment and Exposure

Given all the above, we consider our exposure to the risk of slavery/human trafficking to be minimal. However, we have taken all necessary steps both internally and with those we have dealings with externally to ensure such practices do not occur.

We do not employ any temporary or agency staff, and all employees go through mandatory training in this area as set below.

Training and Awareness

Training has been incorporated into our induction programme to ensure all our staff are aware of the risks of modern slavery and human trafficking. This training forms a mandatory element of our induction and requires formal sign-off upon completion. Training will be reviewed and refreshed annually.

Metro Shipping recognises that knowledge is key, and all employees must complete the mandatory Modern Slavery training upon starting their employment and commit to preventing labour exploitation by completing their new starter induction.

The new starter induction and training includes the following aspects:

- The basic principles of the Modern Slavery Act 2015;
- 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 the organization.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.

Metro Shipping publishes all policies and procedures on the company internet page to ensure employees are aware of not just the company responsibility, but their responsibility to raise any suspicions or evidence of potential slavery or human trafficking issues to the relevant parties within the organisation.

To ensure that the company employees understand the basic principles of the Modern Slavery Act 2015 and ensure that the Group is 100% compliant, it will continue to ensure that it and its 3rd party suppliers are compliant and that no Modern Slavery or Human Trafficking is taking place.

Metro Shipping will raise awareness of modern slavery through regular reminders and by adding this statement to our company website at www.metroshipping.co.uk

Board approval

This statement has been formally approved by the Board of Directors of Metro Shipping and signed on their behalf

Grant Liddell

Managing Director

Dated: March 2023