# Modern slavery statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Star Cargo plc has taken during the year ended 30 September 2022 and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Star Cargo plc has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our business

The principal activities of Star Cargo plc are within the transport and logistics sector and the group operates from seven different locations across England. All of the subsidiaries within the group have at least some form of an international aspect to their trading operations.

## Our high risk areas

The high risk areas of the business are where those customers and suppliers are based overseas, particularly outside of Europe, where there are greater differences between business and cultural practices. These risks are mitigated by carrying out due diligence on customers and suppliers (see below), including visiting these parties in person to gain greater assurance.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. 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.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Employee code of conduct. This is set out within the group's Employee Handbook.

## Our suppliers

Star Cargo plc conducts due diligence on all of its major suppliers before allowing them to become a supplier. This ensures that, as far as is practically possible, we are confident that our suppliers have taken steps to eradicate modern slavery within their business, hold their own suppliers to account over modern slavery and pay their employees at least the national minimum wage in the UK or the

prevailing minimum wage applicable within their country of operation. We will terminate the relationship at any time should any instances of modern slavery come to light.

Training

Employees receive instructions so that they can be aware of the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was reviewed, updated and approved by the Board of Directors on 31 March 2023.

Signed by:
Alex Hodgkinson
Finance Director