

EV Downton

Modern Slavery Statement

June 2023

Sustainability, growth and innovation represent the three core values of EV Cargo. And at the heart of the group's business strategy is the vision of building a fairer, more socially inclusive world with an absolute commitment of respecting human rights.

This is the EV Cargo Downton Modern Slavery Statement in respect of slavery and human trafficking following the introduction of the Modern Slavery Act 2015 (MSA). EV Downton is fully committed to compliance with the MSA and all applicable legislation.

Established and headquartered in Gloucestershire, Downton operates 600 tractor units and 1,800 trailers out of ten major distribution hubs across the UK – Moreton Valence (headquarters), Quedgeley, Chepstow, Dunstable, Leeds, Runcorn, Avonmouth, Shepton Mallet, Shotton and Tilbury. EV Downton's client list includes some of the UK's largest companies across a range of industry sectors including print and publishing, food and drink, retail, manufacturing, paper, construction, energy, waste and consumer goods

Our Business

EV Downton is a private logistics business with the capacity and scale of a major multi-national logistics provider and employs around 1,197 staff. (@ 1.5.2023)

EV Downton recognises that its business model presents various risks as outlined within the Act using agency and temporary staff in the UK.

Policies

The following EV Cargo parent policies apply to our UK businesses and global network.

- Ethical Trade Policy
- Corporate Social Responsibility Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Risk

Parent Company - EV Cargo, has an independently administered hotline available to all employees across our global network to raise any concerns they have or may see. Our whistleblowing policy elaborates and promotes Speaking out "it's ok to say".

In addition the following steps are taken to support our commitment to MSA:

- No one shall be held in slavery or servitude. There is no use of forced or compulsory labour, as outlined in the UK Modern Slavery Act 2015;
- There is no human trafficking for the purposes of exploitation, which includes securing services by force, threat or deception, or securing services from children and vulnerable persons as outlined in the UK Modern Slavery Act 2015;
- Workers are free to leave their employer after reasonable notice;

- Freedom of association and the right to collective bargaining are respected to the extent permitted by local law;
- All workers are able to join or form Trade Unions, and to bargain collectively;
- All employers must adopt a fair and open attitude to the activities of Trade Unions;
- Working conditions are safe and hygienic;
- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment;
- Workers shall receive appropriate health and safety training, and such training shall be repeated for new or reassigned workers;
- The company observing the Policy shall assign responsibility for health and safety to a senior management representative;
- Child labour shall not be used;
- There shall be no use of child labour which shall be exploitative or shall jeopardise the health, safety, educational development or morals of any child;
- Persons under 18 shall not be employed to work at night or in hazardous conditions. The relevant age laws of the employing country shall be respected;
- Wages shall always be enough to meet basic needs and provide some discretionary income;
- Wages and benefits paid shall meet, at a minimum, national legal standards or the industry benchmark- whichever is higher;
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid;
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission for the worker concerned. All disciplinary measures should be recorded;
- Working hours comply with national laws and known benchmark industry standards;
- Workers should not, on a regular basis, work more than 48 hours per week;
- All workers should be provided with at least one day off for every seven-day period or two consecutive days within a 14 day period;
- Overtime should be voluntary and should not be demanded on a regular basis;
- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, marital status, sexual orientation, union membership or political affiliation;
- Employers must, unless unavoidable, provide regular employment based on a recognised employment relationship established through national law and practice;
- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited;

Risk

EV Cargo Downton has identified sub-contractor labour and agency workers, as the main area where there is risk, in which human trafficking and modern slavery could occur.

EV Downton works with suppliers, agencies and business partners with the objective of ensuring that they are open and transparent to their activities and are fully compliant with the MSA.

Risk by services offered/provided is continuously assessed by EV Downton, which works towards mitigating, monitoring and controlling the risks identified.

EV Downton works to raise awareness of modern slavery and human trafficking within its business.

Modern slavery training is role specific and mandatory where it is required. Training is assigned at the start of employment and renewed every 12 months.

Due Diligence & Audits

EV Downton is committed to establishing a combined audit drive with third parties and suppliers to build socially responsible supply chains.

EV Downton is committed to implementing a process where all third parties are subject to due diligence checks.

In order to further enhance the existing controls, EV Downton gradually introduces the conduct of audits across the company in the United Kingdom.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2023.

This statement was approved by the Board of EV Downton at its meeting on 26th May 2023.

Andrew Humpherson
CEO (June 2023)