

Purpose

Lanes Group acknowledges their responsibilities in respect of the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods / services to the organisation, as well as the main supply chain for Lanes Group.

Organisational Structure & Supply Chain

Lanes Group is committed to driving out acts of modern-day slavery and human trafficking within its business and from within its supply chains, including suppliers, contractors, sub-contractors, and partners.

Directors, senior management, and all managerial staff shall take responsibility for implementing this policy, its commitments and shall provide adequate resources (including information, instruction, monitoring, and reporting of issues etc.) and investment to ensure that modern slavery and human trafficking is not taking place within the organisation and within its supply chain.

Due Diligence

As part of the Lanes Group's due diligence processes into modern slavery and human trafficking the supplier approval process incorporates a review of the controls undertaken by the suppliers of goods / services.

Monitoring of any potential imported goods from sources from outside the UK and EU are monitored and controlled to prevent modern slavery taking place.

Lanes Group will not support or work with any companies knowingly involved in modern slavery or human trafficking.

Risk Assessment & Management

All Lanes Group supply chain is vetting and categorised via a 'Tier' system (Tier 1, 2 & 3). The whole supply chain is vetted every 3 years including a review which is completed annually.

Lanes Group holds a list of all suppliers/contractors via the SHE Portal which all employees have access to. If a supplier/contractor doesn't appear this means they have not been approved via the Lanes Group supply chain process.

For all supply chain queries, please follow the Lanes Group Procurement Policy.

Transparency and accountability will be maintained, with any findings recorded and appropriate action(s) taken. Communication will be sent to relevant stakeholders, highlighting the steps being taken to combat modern slavery.

Training & Awareness

Lanes Group raises awareness on modern slavery through:

- Management – Any modern slavery concerns can be raised to Scott Norris who is Designated Modern Slavery Lead within Lanes Group.
- Communication – This policy is updated annually and communicated out to all employees via staff noticeboards, stored within the company Integrated Management System (IMS), Toolbox Talk which is issued out annually, via the company website and on the gov.website.
- Training – A Modern Slavery e-learning module on Human Focus must be completed by all employees.
- Monitoring - Modern Slavery questions are now integrated into the internal IMS audit question set. To monitor and measure the understanding of Modern Slavery across all depots and departments.

Key Performance Indicators (KPIs)

To streamline our current suppliers across the whole of Lanes Group to ensure that suppliers are regularly reviewed for compliance with Modern Slavery Act 2015.

To measure the percentage of employees and suppliers who have completed modern slavery awareness training.

Track the number of investigations initiated in response to reports of modern slavery. Ensuring that all reports are thoroughly investigated, and appropriate actions are taken.

Measure the number of corrective actions taken following the identification of modern slavery incidents.

Assess the percentage of suppliers that comply with Lanes Group's modern slavery policy.

Collect feedback from employees and suppliers regarding the effectiveness of modern slavery policies and training. In order to identify areas for improvement and ensure that the policy is effective.

Track the reduction in the number of high-risk suppliers over time. This will reduce the overall risk of modern slavery within the supply chain.

Remediation

If you suspect that someone might be a victim of modern slavery or modern slavery have been identified, please contact:

Lanes Group Designated Modern Slavery Lead:

Scott Norris – Commercial Director & Company Secretary

Scott.Norris@Lanesgroup.co.uk

Tel: 0759020417936

Please see below several resources available to support victims of modern slavery:

Modern Slavery Helpline is based in the UK and provides information, advice, and guidance about modern slavery issues.

Telephone: 0800 012 1700

Email: <https://www.modernslaveryhelpline.org>

The Salvation Army offers specialist support for survivors of modern slavery, including a 24/7 confidential referral advice line.

Telephone: 0800 808 3733

Email: <https://www.salvationarmy.org.uk/modern-slavery>

GOV.UK Resources provides statutory guidance on identifying and supporting victims of modern slavery, including the process for determining victim status.

Email: Visit the GOV.UK modern slavery guidance page3.

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Commitments

Lanes Group expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery and human trafficking:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chain.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery and human trafficking in our operations and supply chain.
- The prevention, detection and reporting of modern slavery and human trafficking in any part of our organisation or supply chain is the responsibility of all those working for us, with us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

- If any individuals or organisations working with us or on our behalf have breached this policy, Lanes Group will ensure that appropriate action is taken.
- A section on Modern Slavery will be included within the company risk assessment and company objectives. These documents will be reviewed annual or if any legislation has changed/updated.

A copy of this policy and the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from HR and HSEQ&T departments upon request.

Scott Norris



Commercial Director & Company Secretary of Lanes Group Limited
5th November 2024