



## Modern Slavery and Human Trafficking Statement

This statement sets out EPS Logistics Technology Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021. The law relating to this statement is The Modern Slavery Act 2015.

Our organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of EPS Logistics Technology Ltd:

EPS Logistics Technology are leaders in the design, development and manufacture of reusable containers, preservation systems and ground handling equipment. We provide full project management services and are a listed UK defence contractor.

We provide this statement in line with our Supply Chain Management Manual.

### Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The Board of Directors are responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** Our Suppliers are reviewed, and risk assessed during the supply chain procurement process and graded using the supplier categorisation tool. Reporting on the organisational responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** Business Support department is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and will report to the board any instances found to be within our supply chain.
- **Training:** Training has taken place within the company, and with suppliers and to better understand and respond to the identified slavery and human trafficking risks.

### Relevant policies



We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supply Chain Management Procedure** 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 as documented within.

## Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through our own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular Ethical trading.



- 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.

## **Performance indicators**

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff/staff working in supply chain to have completed training on modern slavery by the end of the financial year.
- developing a system for supply chain verification in place for the financial year, whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing our existing supply chains expected to be completed by end of the financial year, whereby we evaluate all existing suppliers.

## **Training**

We require all staff/staff working in supply chain within our organisation to complete training on modern slavery.

Modern slavery 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 external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- 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.

# EPS Corporate Manual



EPS LOGISTICS TECHNOLOGY LIMITED

This statement was approved on 25<sup>th</sup> March 2020 by our Managing Director, who will review and update it annually.

**Signature:**

A handwritten signature in black ink, appearing to be 'Mark Chapman', written over a light blue horizontal line.

**Name: Mark Chapman**

**Date: March 2020**