



## Modern Slavery and Human Trafficking Statement

### 1: Opening statement from senior management

Culina Group Limited and its subsidiaries is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers.

### 2: Structure of the organisation

Culina Group Limited is a leading third party UK logistics business providing nationwide contract logistics and supply chain management services to a wide range of companies. The Company has a global annual turnover of around £2.2b. The Culina Group structure consists of Culina Group and all subsidiary businesses.

In order to manage over 20 million square feet of warehousing and operate a large modern commercial vehicle fleet, we work with a range of suppliers providing agency labour and/or professional contract services.

### 3: Policies

As part of our commitment to combating modern slavery, we have implemented an Anti-Slavery Policy, together with supporting documents dealing with risk assessments and supplier audits.

We also make sure our suppliers are aware of our policies, and adhere to the same high standards.

These policies have been developed and agreed by the Culina Group Board.

### 4: Policies and Procedures

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following policies and procedures.

- Set the tone from the top through a Board level communication reinforcing the organisation's zero tolerance towards modern slavery.
- Adopting a modern slavery policy and supplier code of conduct, and/or modifying existing policies and codes.
- Undertaking a risk assessment of existing supplier relationships.
- Reviewing procurement policies and procedures to ensure that they are capable of responding to any issues identified in the risk assessment.
- Updating standard contracts to ensure that suppliers are required to comply with the policy and/or code of conduct and the Modern Slavery Act 2015.
- Ensuring that whistleblowing policies cover modern slavery reporting.
- Implementing a targeted training programme to ensure that those responsible for procurement or managing supply chains are aware of the issues.

### 5: Risk and compliance

Culina Group Limited regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by the risk management activities carried out and/or procedures in place.

We do not consider that we operate in high risk sectors or locations and Culina Group Limited complies with all legislative and professional standards.

Where we have identified a potential risk, these risks can be investigated, remediated and mitigated through activities such as due diligence, improved procurement practices and industry collaboration.

We aim to ensure all our suppliers adhere to our Anti-Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policy we will immediately seek to terminate our relationship with the relevant supplier.

#### **6: Effectiveness and KPIs**

Culina Group Limited uses relevant management information to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

#### **7: Training**

We continue to invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisation's Anti-Slavery Policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

#### **8: Further actions and sign-off**

Following our review of actions this year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to continue to review and take further necessary steps to tackle slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Culina Group Limited slavery and human trafficking statement for the year ending December 2023.

Signature:

*Ian Smith*

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CEO

Culina Group Limited

Date: 15th January 2025