

## Ligentia Modern Slavery Statement 2022

**Ligentia Group Holdings Limited (a company registered in England with number 10650773) on its own behalf and on behalf of its worldwide group companies (in this statement collectively identified as "we", "our" or "Ligentia"), is committed to identifying and addressing modern slavery and human trafficking in all forms in their business practices.**

Ligentia understands that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

Modern slavery remains a hidden yet dangerous problem on our global society. We all have a responsibility to be vigilant in recognising and responding to the risks, however small, in our business and in the wider supply chain.

Ligentia has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### **Update**

This statement sets out the actions we have taken to prevent modern slavery and human trafficking in our business and supply chain since our last modern slavery statement was published.

### **Ligentia's structure and business**

We are a solution-focused logistics supply chain provider, founded on the principles of professionalism, partnerships and strong systems. We are an asset-light and independent provider of cost-effective, lean and agile solutions, covering our core markets of the UK and Europe, Asia and Australia.

Our capabilities include sea and air freight forwarding, warehousing and fulfilment, trucking, and supply chain management information systems. We are very aware of the potential risks of modern slavery, especially in some of the geographies where we operate. No matter how small these risks may be, we are taking active steps to identify and where applicable mitigate them as quickly as possible.

### **Our policies on slavery and human trafficking**

The policies we have in place and our anti-slavery statement reflect our commitment to:

- paying people fairly and properly for their work;
- acting ethically and with integrity in all our business relationships; and
- enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

**Our main policies include:**

- Fair Pay

Ligentia is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform.

- Employee Awareness and Compliance

Our staff handbook sets out all our employment policies and procedures. It includes our expected standard of conduct, which incorporates our anti-slavery policy and measures.

Being aware of the contents of our employee handbook is one of our mandatory policies, which we expect all employees to observe; each employee signs a declaration when they join confirming their familiarity with our mandatory policies.

- Recruitment

Most of Ligentia's workforce is employed directly on a permanent or fixed term basis. Our recruitment takes place through a combination of direct advertising on our website and in industry publications/digital media; using reputable agencies and relying on referrals from employees within our organisation.

We only use specified, reputable employment agencies and have a set of standard terms and conditions of business with each agency. We verify the practices of any new recruitment agency as part of our terms of business with them and before accepting workers from that agency.

All employees who join us are subject to checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These include verification of identity, references, evidence of qualifications, criminal and financial checks. For the few roles in our business which are filled by contractors or agency workers, we ensure that similar checks to those for employees are carried out.

- Suppliers and partners

We operate a supplier and partner verification process, where we undertake a number of due diligence checks. For suppliers and partners where there is deemed to be an additional risk of slavery or human trafficking, supplementary checks are completed.

Ligentia's suppliers and partners are an important part of our success and our culture. We expect them all to conduct their business with the same commitment to ethical business practices as Ligentia.

Ligentia and its suppliers and partners will:

- not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily or under threat of penalty;
- ensure that the overall terms of employment are voluntary; not hold passports of migrant workers;

- not pay fees to agents other than reputable temp worker agencies where there is an opportunity for workers to engage in temporary to permanent employment;
- comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements;
- compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay agreements;
- abide by applicable law concerning the maximum hours of labour – such as the provisions of Working time Directive(s) or other applicable laws; and
- keep records of, and be entirely transparent in complying with the above.

### **Next Steps**

We have reviewed our supply chain protocols and continue to take the measures described above to reduce Ligentia's exposure to modern slavery and human trafficking issues. We disseminate our policies through our supply chain and regularly review our supply chain and its compliance with these policies.

The specific measures we are taking through the next financial year include:

- reiterating to all current critical suppliers their required compliance with Ligentia's zero tolerance approach to human rights abuses and, where appropriate, requesting details of their due diligence procedures both for internal compliance and within their own supply chains;
- including a specific requirement in our procurement vetting process for prospective suppliers to disclose their position on human slavery and trafficking and provide policies/statements as appropriate;
- renewing contracts with Tier 1 overseas agents incorporating Ligentia's Modern Slavery policy;
- ensuring Tier 1 partners have contracts including a modern slavery clause or have a policy of their own displayed on their website.
- identifying and rolling out the Ligentia Modern Slavery policy to Tier 2 suppliers in the UK and overseas;
- implementing the Ligentia Anti-Slavery Policy and providing training for all our managers, both new and existing;
- continuing to safeguard whistle-blowers via our 'Whistle-blowing Policy'; and
- ensuring that Modern slavery collateral is displayed in all Ligentia offices and on our intranet site.

### **Board Declaration**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ligentia's slavery and human trafficking statement for the financial year ending 31 December 2021. It has been approved by the Ligentia Group Holding Limited's board, who will review and update it annually, and has been personally executed by Rakesh Patel, Chief Financial Officer and statutory director of Ligentia Group Holdings Limited.

**Rakesh Patel**

**Chief Financial Officer**

**May 2022**