

Modern Slavery Policy Statement

1.0 Introduction

Abbey Logistics Group is a logistics service provider and one of the UK's most recognised and respected transport brands. Our business operates a UK-wide distribution network of 5 main and 23 operational depots. We employ over 600 employees, 450 of whom are LGV Drivers. AXLE Topco is our Holding Group.

Abbey provides road transport services to bulk liquid and powder customers throughout the UK and Northern Europe. We are the largest bulk food grade transport company for liquids and powders. We have a growing transport reputation in the construction, animal feed and non-hazardous chemicals sectors. We also operate a warehouse bulk pallet division.

We have zero tolerance to slavery and human trafficking. We ensure our Policy on 'Modern Slavery' is communicated and accessible to all colleagues. We also displayed our Policy in prominent areas across our organisation. To ensure our suppliers and any contractors we engage comply with our Modern Slavery Policy, we have in place a supply chain compliance process. We also ensure future contracts reference to our commitment to the Modern Slavery Act 2015.

Our recruitment procedures include validation checks on right to work in the UK. This provides further safeguarding against human trafficking or modern slavery.

Our whistleblowing policy available to all colleagues allows colleague to raise concerns without fear of reprisals.

1.1 Purpose

Abbey Logistics Group Limited, Axle Topco Limited, are committed to ensuring there are no acts of modern slavery and human trafficking within our business and within our supply chains.

The company acknowledges their responsibility to the Modern Slavery Act 2015. Our business aims to ensure our policy is transparent and supports the actions we take when dealing with suppliers of goods and services across our organisation.

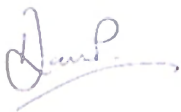
This statement encompasses the actions our Group Companies will take to deal with any potential risk of modern slavery in the business or supply chains.

Our Anti-Slavery, Bribery and Corruption and Ethic Policies reflect our commitment to act ethically and with integrity at all time and in all our business relationships.

Our aim is to implement and enforce effective risk assessment and due diligence processes to ensure Modern Slavery and Human trafficking is not operating within our supply chain.

1.2 Scope

This policy applies to all colleagues, both permanent and temporary and any person working on behalf of Abbey Logistics Group Limited, Axle Topco and Bidco Limited. We expect all our suppliers and contractors to comply with this policy or an equivalent policy.



David Patten, MD

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1.3 Responsibilities

Role	Responsibilities
CEO & Board Members	<ul style="list-style-type: none"> • Ensure the effective implementation of this policy • Allocate sufficient resources to enable this policy to be delivered correctly and meet compliance • Monitor the overall effectiveness of this policy • Ensure the SHEQ Team and Line Management have the correct resource and equipment for this policy to be delivered correctly and meet compliance
SHEQ Team	<ul style="list-style-type: none"> • Develop a specific policy containing clear information and instruction for all parties involved • Review the policy, upon any changes to business, legislation, new in-vehicle equipment planned to be introduced, and at regular intervals as required within the ALGIMS system • Provide training, guidance, and competent advice to management/ employees regarding the content of this Policy and associated guidance
Line Managers	<ul style="list-style-type: none"> • Ensure all parties involved have formally received, read, and understood the policy • Manage any driver / caller non-compliance to the content of this policy • Ensure the policy is formally issued to all new employees and agency provision
Planning Department	<ul style="list-style-type: none"> • Provide encouragement and support for our drivers and act appropriately to assist them with this policy
All Drivers, including Agency, subcontractors, and Grey Fleet	<ul style="list-style-type: none"> • Adhere to the instructions contained in the policy and adopt the guidance provided • Raise any concerns or non-compliance by others in following this policy

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2.0 Policy

Our induction process (which all colleagues who join our business attend) raises awareness of our commitment to ensure there are no acts of modern slavery and human trafficking within our own business or supply chains.

We are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- Our aim is to prevent, detect and report any act of modern slavery in any part of our organisation or supply chain. Workers must not engage in, facilitate, or fail to report any activity that may lead to a breach or breach this policy.
- We are committed to engaging with our suppliers to address the risk of modern slavery in our operations.
- We take a risk-based approach to our contracting processes and keep them under review.

We also assess the merits of writing to suppliers requiring them to comply with our 'Code of Conduct' to combat modern slavery and trafficking

Risk Assessment

Abbey Logistics will evaluate the potential exposure to the risk of modern slavery and human trafficking in our supply chain. Abbey Logistics is not considered to be operating in high risk sectors or locations but will ensure compliance with the Modern Slavery Act 2015.

Due Diligence

All Departments supported by our SHEQ Department are responsible for investigations in relation to known or suspected instances of slavery and human trafficking.

Any matter that gives cause for concern will be thoroughly investigation via our ALG 'Incident Notification Process' or Whistle Blowing procedure. In 2019, Abbey Logistics implemented a new supplier questionnaire to better understand and ensure supplier compliance with Modern Slavery.

Supplier Adherence

Abbey Logistics is committed to ensuring that their suppliers maintain high ethical standards. All suppliers will be advised that any breach of the Act, could result in the immediate termination of the contract.

Abbey Logistics work closely with employment agencies to source labour, and always verifies the practices of any new agency it is using, before accepting workers from that agency. The Procurement team implemented a new supplier questionnaire to better understand supplier compliance with Modern Slavery.

Measuring Effectiveness

SHEQ department will monitor any concerns raised about Human Trafficking and investigations conducted.

In addition to our new supplier questionnaire, our Business will utilise internal measure in payroll to periodically check internal compliance against Modern Slavery.

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Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Abbey Logistics will provide training to relevant members of staff, including procurement teams and managerial colleagues.

Our training will increase awareness of modern slavery and the Modern Slavery Act 2015. Our Human Resources Training Department will ensure 100% compliance in respect of training related to this Policy including Anti-Bribery and Corruption.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery and Human Trafficking statement for the current financial year.

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