

37. SLAVERY AND HUMAN TRAFFICKING POLICY

1. Purpose

Transol Logistics is committed to preventing modern slavery and human trafficking within its operations and supply chains. This policy outlines the company's approach to ensuring that slavery and human trafficking are not occurring within the business, and the actions that Transol Logistics takes to identify and mitigate such risks.

2. Scope

This policy applies to all employees, suppliers, contractors, and third parties working with Transol Logistics, both within the UK and globally. It covers all business operations, including the supply chain, recruitment, and the procurement of goods and services.

3. Legal Compliance

Transol Logistics is fully committed to complying with the **Modern Slavery Act 2015** and other applicable laws and regulations regarding slavery and human trafficking. We also work towards upholding the principles of the **Universal Declaration of Human Rights** and other international human rights agreements.

4. Definition of Modern Slavery and Human Trafficking

- **Modern Slavery:** Refers to situations where individuals are forced to work under the threat of violence, coercion, or abuse of power, with little or no freedom of movement or decision-making.
- **Human Trafficking:** Involves the recruitment, transportation, transfer, or harbouring of individuals through force, fraud, or deception, for the purpose of exploitation (e.g., sexual exploitation, forced labour, etc.).

5. Our Commitment

Transol Logistics is committed to taking a zero-tolerance approach to slavery and human trafficking. We believe in maintaining a safe, respectful, and ethical work environment for all employees, suppliers, and partners.

6. Responsibilities

- **Management:**
 - Ensure compliance with this policy by integrating it into the company's operations.
 - Ensure appropriate resources are allocated for training and awareness programs regarding slavery and human trafficking.
 - Regularly review the effectiveness of this policy and make improvements as necessary.
- **Employees and Contractors:**
 - All employees are expected to support this policy by adhering to ethical conduct, reporting any suspicions or concerns regarding slavery and human trafficking, and following established procedures to raise issues.
 - Suppliers and contractors must also adhere to this policy, ensuring that no slavery or human trafficking is involved in the delivery of services or products.
- **Suppliers and Partners:**
 - Suppliers and partners must comply with this policy, and we expect them to take steps to ensure that modern slavery and human trafficking do not exist within their own operations or supply chains.

7. Risk Assessment

Transol Logistics acknowledges that certain areas of the supply chain may present higher risks of slavery and human trafficking, particularly where labour practices are less regulated, or where workers may be more vulnerable to exploitation. To mitigate these risks:

- Transol Logistics will conduct regular assessments of its supply chains and operations to identify any potential risks for modern slavery and human trafficking.
- High-risk regions, industries, and third-party suppliers will be reviewed more thoroughly.
- Where appropriate, Transol Logistics will work with suppliers to ensure improvements are made to labour practices and conditions.

8. Recruitment and Employment Practices

Transol Logistics is committed to ethical recruitment practices and ensuring that all employees are recruited fairly and transparently:

- All recruitment is conducted in accordance with labour laws and regulations.
- All workers will be provided with a written contract outlining their rights, wages, and terms of employment.
- No employee will be charged any fees for recruitment, and they will not be required to surrender their passports or identity documents as a condition of employment.
- All employees must have the freedom to leave employment with appropriate notice and in line with their contract terms.

9. Training and Awareness

- Transol Logistics will ensure that all employees are aware of the issue of slavery and human trafficking.
- Regular training will be provided to all employees, especially those involved in recruitment, procurement, and supply chain management, to help them recognise potential signs of exploitation.

- Training will also cover how to report concerns and the steps to take if modern slavery or human trafficking is suspected within the workplace or supply chain.

10. Reporting and Whistleblowing

Transol Logistics encourages any employee, supplier, or third party to report any concerns they may have regarding slavery or human trafficking. Employees who suspect or identify any potential cases of modern slavery or human trafficking should follow the company's **Whistleblowing Policy** or report their concerns directly to management.

- Employees who make a report in good faith will not face retaliation, and all reports will be taken seriously and investigated promptly.

11. Due Diligence Process

- **Supplier and Contractor Vetting:**
 - Transol Logistics will conduct due diligence on all potential suppliers and contractors to ensure they comply with this policy. This includes requiring written assurances from suppliers and contractors that they have effective measures in place to prevent modern slavery and human trafficking within their operations.
 - Where necessary, Transol Logistics may request additional documentation or audits to verify that suppliers meet these standards.
- **Audits and Monitoring:**
 - Transol Logistics will carry out periodic audits of suppliers to ensure compliance with this policy. If any supplier is found to be engaging in practices that do not align with Transol Logistics' ethical standards, immediate action will be taken, which may include terminating the business relationship.

12. Sanctions for Non-Compliance

Failure to comply with this policy will be taken very seriously and may result in disciplinary action, up to and including termination of employment or business relationships.

- If a supplier or partner is found to be involved in slavery or human trafficking practices, Transol Logistics will consider terminating the relationship immediately and may report the matter to the relevant authorities.

13. Review of the Policy

This policy will be reviewed annually to ensure that it remains effective and aligned with any changes in laws, regulations, or operational practices. Updates and revisions will be communicated to all employees, contractors, and partners as necessary.

14. Conclusion

Transol Logistics is fully committed to preventing slavery and human trafficking in all forms. We expect all employees, suppliers, and partners to uphold the same standards of integrity and ethics, and to take action to help eliminate these illegal practices from our operations and supply chains.

Approved by:

Manish Leel

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