

# MODERN SLAVERY

February 2021

## Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that the Gregory Group has taken to ensure that modern slavery and human trafficking is not taking place in any part of the service we provide, or our supply chain.

## Organisation Structure

Gregory Distribution is a long established, family-owned transport company which operates across a broad range of transport types. Its current turnover is in the region of £170 million and it employs around 2,000 people across 30 sites and operates over 700 vehicles. It services a diverse range of customers across many market sectors. The group companies consist of Gregory Distribution Ltd, Arr Craib Ltd and Hayton Coulthard Transport Ltd (50:50 JV). This statement is made on behalf of the whole group.

## Our Suppliers

Our supply chain features various suppliers covering all aspects of the service we provide including, for example, suppliers of agency staff, vehicle components/consumables, facilities maintenance and utilities. Respecting human rights of those involved in our supply chain is ultimately our suppliers' responsibility. However, as customers, we play an active role in supplier development and when contracting with suppliers we clearly communicate our expectations.

## Our commitment to preventing Modern Slavery and Human Trafficking

We are committed to ensure that no forms of modern slavery or human trafficking occur in any part of our business or supply chains.

We undertake all reasonable and practical steps to ensure that our standards are implemented and that local legislation and regulations are being complied with, both throughout our business, and within our direct supply chain.

We will strive to only work with those parties who fully comply with these standards and will deal with issues of non-compliance on a case by case basis.

The Group has a range of policies, procedures, and contractual requirements in place which underpins the prevention of slavery and human trafficking within our organisations or supply chains. These include but are not limited to

- Robust Disciplinary and Grievance Policies;
- Equal Opportunities and Dignity at Work Policy;
- Whistleblowing Policy in place to encourage all staff to report concerns internally (with the protection of the Company's Whistleblowing Policy);
- Clear recruitment procedures and systems;
- Ensure all new employees receive a briefing about the company's approach and expectations to Modern Slavery during induction;
- Longstanding relationships with external suppliers, where possible, to ensure commitment to our expectations of business behaviour;

- Acknowledge requirements in our commercial and supplier contracts; and continued engagement of external providers and suppliers which have their own policies and procedures aimed at preventing modern slavery and human trafficking.

Our Group Risk and Internal Audit Committee regularly reviews the risks to the Group on the prevention of slavery and human trafficking and the audits of our policies and procedures. This ensures they are robust and fulfil the requirements to identify and deal with any incident that may occur regarding the prevention of modern slavery and human trafficking.

### **Enforcing our values**

This policy has been circulated throughout the Gregory Group, and it is the responsibility of all employees to uphold. We encourage all employees to be vigilant and report any suspicions of any acts or behaviours which may contradict this statement to their Manager or HR Department.

As part of the Group's ongoing development we may also review or reconsider additional policies, procedures or requirements if appropriate to ensure there is no slavery or human trafficking taking place in our Group or in our supply chains.

We will not support or knowingly do business with a company involved in slavery or human trafficking. Any employee who fails to comply with this statement will face disciplinary action up to and including dismissal.

### **Progress we have made**

Since we published our Modern Slavery Act Statement last year, we have:

- Reviewed and updated our standard contractual terms that we use with our suppliers;
- Enhanced our Whistleblowing Policy to ensure all employees can report concerns;
- Improved our focus on Risk Management by setting up an Emergency Response Committee;
- Launched "The Gregory Group Way" which is a set of behaviours covering how we expect our employees to act.

**This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and was Approved by the Board of Directors on 9 February 2021. (Original document approved on 20 January 2017 and reapproved on 19 January 2018, 28 January 2019 and 23 January 2020)**