



*S.C.A. - Shipping Consultants Associated Ltd.*

Chatham, 18<sup>th</sup> March 2024

## **Subject: Modern Slavery Statement 2023**

This statement has been published in accordance with the Modern Slavery Act 2015. It also follows the guidance as set out within the Home Office’s “Transparency in Supply Chains: A Practical Guide” document and utilises the framework as described within the Ethical Trading Initiative’s Modern Slavery Framework. The statement sets out the steps taken by S.C.A. – Shipping Consultants Associated Ltd and other relevant group companies (S.C.A. or ‘Group’) during the year ending 31 December 2023 to prevent modern slavery and human trafficking in its business and supply chain.

### **Introduction**

In accordance with the Modern Slavery Act 2015, we define modern slavery in that it encompasses servitude, forced or compulsory labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity, having restrictions on freedom of movement and human trafficking in order to exploit them for personal or commercial gain, all of which constitute an offence under the Act.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person of liberty and dignity for another person’s gain. It is a real problem for millions of people around the world, including many in developed countries, who are being forced into debt bondage and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At S.C.A. we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2023.

### **Our Organisation structure and supply chains**

S.C.A. is one of the UK’s leading logistics and supply companies in support of Governments and Armed Forces; it provides a one-stop-shop service 24 hours a day, seven days a week, every day of the year. We operate throughout the UK and have offices throughout the world (UK, Singapore, United Arab Emirates, Monaco and Bahrain).

We establish a relationship of trust and integrity with all of our suppliers, both direct and indirect which is built upon mutually beneficial factors.

Our supplier selection and on boarding procedure includes due diligence of the supplier’s reputation, respect for the law, compliance with health, safety and environmental standards, and references. (We haven’t been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.) S.C.A is not a manufacturer of physical goods.



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## **Risk Assessment and Due Diligence**

S.C.A. employs a small number (92) of employees all of which share a collective responsibility to monitor and report on any concerns they have.

Recruitment processes have been expanded to ensure that all employees are aware of the Group's commitment towards the elimination of modern slavery and their collective role in this process. This includes a robust Whistleblowing Policy integral to employment policies and intervention with suppliers.

In the past year, we conducted a further risk assessment of our supply chain by taking into account:

- The risk profile of individual Countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups
- Growth in new markets

This assessment will determine our response via policies and the risk controls that we implement.

## **Policies**

S.C.A. operates the following policies for identifying and preventing slavery and human trafficking in our operations:

### Employees

- Whistleblowing Policy – we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct – our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

### Supply Chains

- S.C.A. monitors, reviews and utilises its terms and conditions, when using suppliers in its supply chain and requires all suppliers to maintain their own compliance with the Modern Slavery Act 2015 and related codes and are, at the earliest opportunity, required to notify S.C.A. of any breaches thereof.
- Purchasing Code – we have again updated our Purchasing Code and supplier contract to make further explicit reference to slavery and human trafficking.

## **Supplier Due Diligence**

S.C.A. conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts



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- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to attest that:

- They don't use any form of forced, compulsion of slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contain a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment.

## **Awareness**

S.C.A. has raised awareness of modern slavery issues by putting up posters across our facilities and sharing a document that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery.

## **Training**

In addition to the ongoing awareness programme, S.C.A. delivers training to all employees on an annual basis which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- We pay particular attention to feedback from employees as this improves understanding of the issues and provides ideas to improve the implementation of our policies. We are planning to make this aspect a more formal and regimented approach for 2024 to enhance this valuable source of information
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps S.C.A. will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by S.C.A.'s anti-slavery policy



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## Measuring how we are performing

S.C.A. have defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training? Both initially and via refresher courses in the year.
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

Our measures of the effectiveness of these steps are reviewed by managers at each location with the results conveyed to the senior group managers and, ultimately, the Board of Directors.

Although we endeavour to provide support to our suppliers and employees our ultimate solution is to terminate contracts if breaches of modern slavery are identified. Key suppliers are constantly monitored and have proactively cooperated with our approach.

This statement was approved by S.C.A.'s Board of Directors on 18<sup>th</sup> March 2024.

M. J. Harrison  
Director

18.03.2024



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