

## Nagel Langdons Operational Policy Statement 2-105

# Modern Slavery and Human Trafficking Statement

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### Introduction

Modern slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

### Structure of the Organisation

Nagel Langdons specialises in the transport, storage and distribution by road of temperature controlled foods to the UK food manufacturing, wholesale, retail and catering industries. Langdon Group (non-trading) is the ultimate parent company for the UK group. The group has its Head Office in the UK and all trading depots are based in the UK. Nagel Langdons is also part of the Nagel-Group, a German distribution business based in Versmold.

### The Business

The business is organised into 10 operating depots covering all areas of the UK. Services provided cover haulage, warehousing and fleet maintenance. There is one depot which additionally provides freight forwarding services between the UK and Europe.

### The Supply Chains

The supply chains include the sourcing of fleet consumables, temporary (Agency) staff and subcontract haulage services in order to meet the business needs. We have identified the most at risk areas include non-UK subcontract haulage services used in the freight forwarding services and the use of agencies for staff.

### Policy on Modern Slavery and Human Trafficking

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that, as far as reasonably practicable, slavery and human trafficking is not taking place within in our supply chains.

### Due Diligence Processes for Modern Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- Internal recruitment policies are designed to ensure that all staff deployed within the business, whether directly or indirectly employed, are treated and remunerated in accordance with all applicable UK laws, local practice and industry requirements;
- We will bring to the attention of all employees our policy with regards to Anti-Slavery and Human Trafficking and include it with our Company Policies documents which are held on internal files available for reference at any time;
- Where possible we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour and that they should comply with any requirements regarding the Modern Slavery Act 2015. In addition, we undertake robust checks with any new staff agencies to ensure they meet the standards required by us;
- We have a specific Policy and procedure in place to encourage the reporting of concerns and the protection of whistle blowers;
- When sourcing goods or services from organisations with national or international supply chains, our preference is to deal with a UK company or branch/subsidiary. It is not practical for us (or any other participant in the supply chain) to have a direct relationship with all participants. Therefore, we expect

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each entity within the supply chain to have suitable anti-slavery and human trafficking policies & procedures in place, and that each entity within the chain applies one up' due diligence to their respective suppliers. Currently we are working to establish new supplier codes of conduct which we will expect all our suppliers to agree to. Any international subcontractor suppliers used are vetted not only by us in the UK but also by the German procurement department within the Nagel Group;

- We operate strict policies with regard to any supply chain operators who in any way fail to take all preventable measures whilst engaged on freight forwarding services between Europe and the UK. In addition, all such supply chain operators are required to follow the UK Home Office & UK Border Force code of practice for vehicles.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, we provide training to the relevant senior members of staff.

### Measurement of Success

The following methods are used to monitor the effectiveness of our due diligence processes:

- Use of robust labour recruitment procedures and agency vetting to ensure all staff deployed within the business are done so in compliance with all applicable UK laws;
- Targeted levels of communication and personal contact with our next link in the supply chain based on our assessed exposure of risk with regards to modern slavery and trafficking and their understanding of and compliance with our expectations;
- Completion of Internal Audits by the Compliance team to ensure the Policies & procedures in place, as amended from time to time, are being followed;
- Detailed communication with suppliers that are judged by us to be part of, or employ, supply chains that are at greatest risk of non-conformance to our expectations and the keeping of meticulous records of any freight forwarding breaches of required standards by any supply chain partner and the appropriate actions taken, including the options of permanent exclusion from future trading with ourselves and reporting to the relevant authorities.

### Application & Review

This Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the most recently audited financial year, ending 31<sup>st</sup> December 2020. The Statement is to be reviewed on an annual basis and updated as necessary.

This Statement has been approved by the Board of Directors for the following company on 18<sup>th</sup> March 2021, and it is signed on behalf of the Board by Managing Director, Arran Osman.

- Nagel Langdons Ltd.

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