

## Anti-slavery and human trafficking policy

### 1. Scope of this policy

- 1.1. This policy is a mandatory policy which applies to 'TVS SCS Rico Group' including Rico Logistics Limited (and all its affiliates and subsidiaries), Circle Express Limited, Triage Service Limited and SPC International Limited (referred to as Rico Group).
- 1.2. This policy applies to all Rico Group partners, members, employees (including support staff, international operations staff, consultants and contractors), whether permanent or on fixed term or temporary arrangements and includes those on work experience or temporary placements. For ease in this policy, all such people are referred to as Rico Group Colleagues.
- 1.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. Responsibility for the policy

- 2.1 The Board has approved this policy, is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.
- 2.2 The Senior Management Teams have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Rico Group Colleagues at all levels are responsible for ensuring that they, and those reporting to them, understand and comply with this policy and are given adequate and regular training on the policy and the issue of modern slavery in supply chains.

### 3. Introduction

- 3.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 3.2 Rico Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

### 4. Policy statement

- 4.1 We expect everyone working with Rico Group or on our behalf to support and uphold the following measures to safeguard against modern slavery:
  - 4.1.1 We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Rico Group Colleagues must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
  - 4.1.2 We are committed to gaining a clearer understanding of how modern slavery operates in different contexts, of who is affected and how, and of the risks of modern slavery existing within our industry.
  - 4.1.3 We are committed to having a clear and transparent company statement, which is reviewed regularly, is communicated to our employees and posted on our

website, which sets out the steps taken to prevent modern slavery and trafficking and the effectiveness of those measures.

4.1.4 We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.

4.1.5 We are committed to engaging with our business partners and direct suppliers to address the risk of modern slavery in our operations and supply chain.

4.1.6 As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

4.1.7 Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Code.

## **5. Reporting Modern Slavery**

5.1 Rico Group Colleagues must make a report in accordance with our Whistleblowing policy as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or if they have any concerns or suspicions relating to compliance with this policy.

5.2 If a person, other than an employee, partner or agency worker has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must as soon as possible notify the Senior Management Team.

5.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

## **6. Breaches of this policy**

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.