

Modern Slavery and Human Trafficking Statement

Atlantic Group International Ltd and all subsidiary Company's within its Group are committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company acknowledges its responsibility within the Modern Slavery Act 2015 through publication of this statement setting out the steps we take to prevent modern slavery and related abuses.

We will ensure transparency within the Company and suppliers of goods and the larger supply chain and services to the Company through steps which include:

- Assessing and reducing the risk in the business of modern slavery practices occurring e.g. checking the authenticity of documentation proving right to work in the UK
- Having robust procurement policies that ensure our supply chain is scrutinised for compliance and consequences of non-compliance are clear and actioned i.e. that commercial relationships with suppliers and other business partners will not be entered into (or terminated if existing)
- Providing information to employees on the signs that might indicate that modern slavery is taking place
- Promoting to employees the importance of immediately raising any concerns they may have
- Protecting employees who are 'whistle blowers' in respect of concerns they have about modern slavery

Introduction

This statement sets out Atlantic Group International Ltd's and its group company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st December 2022 – 30th November 2023.

As part of the logistics and freight forwarding industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers the activities of Atlantic Group International Ltd:

We are a provider of logistics and freight forwarding services and have 17 offices across the UK and Europe, employing over 200 people. Our company offers services that include Air Freight, Sea Freight, Road Freight, Customs Clearance Support and Import / Export documentation. Centrally we have HR, IT, commercial, operations and financial teams that support the wider business branches.

Countries of operation and supply

The Company currently operates in the following countries:

- United Kingdom
- Netherlands
- Norway

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

1. We will actively maintain a master list of all suppliers and record their geographical locations.
2. A first review will be conducted in 2023 by AGI to assess all existing suppliers based on geographical location using the 'Global Slavery Index' for reference, which will enable AGI to identify areas of potential risk.
3. Our central operations team will review any feedback or concerns raised about our supplier base and where necessary conduct investigations into their operating practises should we consider them a risk in any way.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

1. **Supplier base:** AGI has yet to determine any risks within its current supplier base. An initial risk assessment will be carried out in 2023 to analyse the existing supplier base and determine any potential high-risk businesses based on geographical location. This information will be cascaded down into the business to support awareness on our suppliers and their risk profile.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The team responsible for maintaining the policies outlined in the new Supplier Code of Conduct document will be the central operations team. The central operations team will also be responsible for putting in place the process for maintaining and monitoring the 'Master Supplier List' that includes the risk assessment derived from comparison to the 'Global Slavery Index' document. The HR team will also ensure that all employees are provided with, and required to confirm they have read and understood, our new 'Modern Slavery and Human Trafficking Policy' which was published in March 2023.
- **Risk Assessment:** AGI's new practices will include ensuring that our supplier onboarding and ongoing audit processes continuously identify, assess and review our existing and new suppliers; reporting, sharing and reviewing findings and learnings within our senior leadership team; annually issuing a modern slavery statement; and responding promptly and effectively to any allegations of non-compliance on modern slavery or human trafficking. AGI will be introducing this compliance approach which requires all of our suppliers to sign up to, and comply with, the new Supplier Code of Conduct. As part of the Supplier Code of Conduct, suppliers agree not to use forced, indentured, involuntary labour or child labour and agree to uphold internationally proclaimed human rights of workers. We take compliance with our Supplier Code of Conduct seriously and any breach allows us to terminate our relationship with a supplier immediately.

- **Training:** The Company will complete direct face to face training on how to identify modern slavery and human trafficking risks, our responsibilities, and Company policy and process in relation to Modern Slavery to all Directors across the business by the 31st July 2023, to ensure that all policies and provisions are understood and delivered by them in the course of their leadership duties. The Company will require all employees working in the UK to complete online training on modern slavery by the 31st July 2023.

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Whistleblowing policy

The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Recruitment

The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting temporary workers from that agency. All agency's will be required to confirm if they have a modern slavery policy in place and describe the process by which risks of slavery and human trafficking are addressed and where action has been taken as a result of the risk of slavery and human trafficking.

Supplier code of conduct

The company is committed to ensuring that our suppliers adhere to the highest standards of ethics. All suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Actively maintaining a master list of all suppliers to assess the geographical risks of modern slavery and human trafficking.
- Providing all suppliers with a Supplier Code of Conduct policy document that must be formally agreed to adherence on. Suppliers identified as potentially high risk may be required to produce further evidence to support the onboarding process in order to further validate that their working practices align to the standards expected by the company.

Based on the first audit in 2023, all suppliers will have applied to them a risk profile based on their geographical location by using information provided by the Global Slavery Index. Feedback from this initial assessment in 2023 will be cascaded down through the business for awareness purposes.

Suppliers who fail to agree upfront or adhere to our Supplier Code of Conduct will face the termination of our relationship. Where required suppliers may also be required to provide further evidence to support their operating standards and co-operate on any investigation work deemed necessary – Failure to comply on information requested or evidence to demonstrate performance improvement could also result in business relationship termination.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring all employees in the UK to have completed training on modern slavery by 31st July 2023.
- Developing a new Supplier Code of Conduct document for all suppliers to agree adherence on which will be launched in the summer of 2023.
- Developing a system for supply chain verification is expected to be in place by August 2023, whereby the company evaluates potential suppliers before they enter the supply chain and requires them to agree to AGI's Supplier Code of Conduct policies before they can be used by the business.
- Reviewing the existing supplier base is expected to be completed by November 2023, whereby the company will evaluate all existing suppliers and highlight their risk profile.

Training

The Company requires all employees working in the UK to complete online training on modern slavery.

The Company's modern slavery training covers:

- Modern Slavery in the UK and what it looks like;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- What external help is available, for example through the Modern Slavery Helpline.

Awareness-raising programme

As well as training employees, the Company has raised awareness of modern slavery issues by including a Modern Slavery and Human Trafficking policy in its Company Handbooks distributed to all employees and the Company will also circulate emails to all employees in this regard. Awareness training will also be provided to all new employees and this is distributed to them on their first working day for completion.

Board approval

This statement has been approved by the Company's board of directors, who will review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to read 'Steve Sands', with a long horizontal flourish extending to the right.

Steve Sands
Managing Director

Date: 31st May 2023