

# **MODERN SLAVERY STATEMENT**

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#### 1. PURPOSE

The purpose of this document is to set out the personal data documents held on file for you by the Human Resources team, the reasons for holding this data and the length of time the data is kept. This ensures that Carousel Logistics complies fully with the new EU General Data Protection Regulations 2018.

#### 2. APPLICABILITY

This document is applicable to all staff, both employed and contractors working for or on behalf of Carousel Logistics.

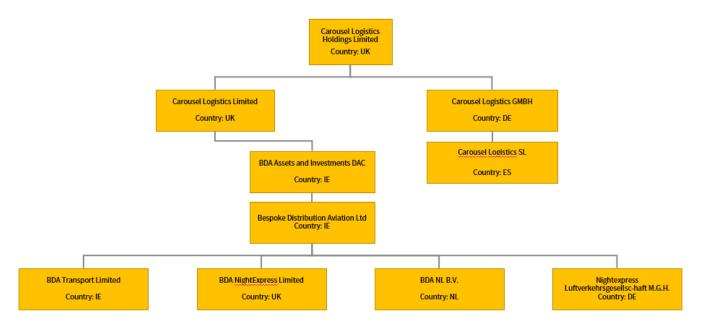
#### 3. MODERN SLAVERY STATEMENT

# A) ORGANISATION

This statement applies to all companies within and associated to The Carousel Group (referred to in this statement as 'The Group'). The information included in the statement refers to the year ending 31<sup>st</sup> December 2021.

# **B) ORGANISATIONAL STRUCTURE**

"The Carousel Group" is made up of Carousel Logistics Holdings Ltd, a holding company which is the 100% owner of Carousel Logistics Ltd, Carousel Logistics GmbH and Carousel Logistics SL:





The Carousel Group provide outsourced logistics services utilizing our first-class technology systems, trusted network and passionate customer service teams to create innovative personalised solutions.

The Carousel Group combine more than 100 partners with our own network and warehouses to provide services to some of the world's biggest players in a variety of sectors including Agriculture, Medical, Energy, Technical Engineering, Luxury and Scientific. For more than three decades The Carousel Group has been helping clients to delight their customers.

The company has grown cumulatively, on average, by more than 15% per annum in the last five years and currently has offices in Kent (UK), Birmingham (UK), Nottingham (UK), Frankfurt (Germany), Munich (Germany), Barcelona (Spain), Dublin (Ireland) and Maastricht (Netherlands)

# C) DEFINITIONS

The Carousel Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

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# D) COMMITMENT

The Carousel Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Carousel Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Carousel Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to The Carousel Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Carousel Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in The United Kingdom, Germany and Spain, and in many cases exceeds those minimums in relation to its employees.

## **E) SUPPLY CHAINS**

In order to fulfil its activities, The Carousel Group provides both 3PL and 4PL logistics services and accordingly within the supply chain utilizes a range of transport providers from around the globe.

## F) POTENTIAL EXPOSURE

In general, The Carousel Group considers its exposure to slavery/human trafficking to be relatively limited, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

# G) STEPS

The Carousel Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Carousel Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, The Carousel Group has taken the following steps to ensure that modern slavery is not taking place:

- Reviewed existing supplier contracts and contacted all suppliers with regards to the Modern Slavery Act 2015. All suppliers have been made aware that the contract could be terminated in the event that supplier is, or is suspected, to be involved in modern slavery.
- All new supplier agreement have been revised to include details of our commitment to the Modern Slavery Act 2015.
- Training has been carried out with all employees within and relating to the procurement department to allow them to effectively spot the signs of modern slavery within the business.
- The company corporate induction has been revised to ensure that all new employees are aware of the Modern Slavery Act and their responsibilities.

## H) KEY PERFORMANCE INDICATORS

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The Carousel Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the group or its supply chains.

• No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified

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# I) POLICIES

The Carousel Group has the following policies which further define its stance on modern slavery:

- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that
  they can raise concerns about how colleagues are being treated, or practices within our
  business or supply chain, without fear of reprisals.

# J) SLAVERY COMPLIANCE OFFICER

The Carousel Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to The Carousel Group's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

**SIGNATURE:** 

**NAME:** Jonathan Simpson-Dent Chief Executive Officer

**DATE:** 1<sup>st</sup> January 2022

# 4. DOCUMENT CHANGE CONTROL

Date of Issue/Latest Update	Version No	Brief Description of Change (e.g. sections altered and reasons)
01.01.21	1.0	Notice First Issue
01.03.22	1.0	Reformatted to new Process documentation