

Focus' Slavery and Human Trafficking Policy is based on obligations contained in the Modern Slavery Act 2015 (the "Act").

Key Requirements

The Act applies to business' whose global turnover exceeds £36 million and that carry on business/part of a business in the United Kingdom. Presently, this does not affect Focus Logistics Ltd, however there should be a policy to make employees and management aware of the Act. One of the obligations under the Act is that a "slavery and human trafficking statement" is published each financial year disclosing the steps a business has taken to ensure that slavery and human trafficking are not taking place in any part of its operations and/or its supply chain.

To ensure the validity of the firm's statement, you must comply with the requirements of this policy being:

- assist Focus in its ongoing endeavors to identify and ensure there is no slavery and / or human trafficking in its supply chain;
- have no personal involvement in slavery or human trafficking, and
- provide periodically a declaration to Focus Logistics that you will in no way engage in or be complicit with slavery and/or human trafficking.

Responsibilities

This policy applies to the CEO, management, employees and temporary contractors.

Additional responsibilities lie with those individuals who, on behalf of Focus Logistics, contracts with third parties providing goods/services to Focus Logistics.

Slavery and Human Trafficking Offences

The Act seeks to address and prevent the following types of exploitative conduct:

- slavery, servitude and forced or compulsory labour and human trafficking;
- prostitution;
- trafficking for exploitation of asylum seekers and immigrants.

A person may be deemed complicit with any of the types of conduct directly or otherwise indirectly through aiding, abetting, counselling or procuring that offence.

Modern Slavery Act Statement

The statement will be produced annually for the approval by the CEO and signed by the Managing Director. The statement will be published on the company's website.

Contracts

All staff must follow the company's procurement policy for all commercial engagements including using the designated due diligence checks - all suppliers/providers of goods and services must be vetted where possible.

High Risk Jurisdictions

Where a supplier declares an involvement in one or more high risk jurisdictions it will be requested to confirm what steps it takes to identify slavery and/or human trafficking within operations/supply chain. CEO must be informed to assess the risk and determine whether Focus should continue engaging with the supplier. Thereafter the CEO may suggest that an alternative supplier be sought.

Personal Obligations.

Any deemed complicity of the CEO, head office member, consultant, Logistic Manager or other employee with slavery and/or human trafficking may invoke the disciplinary procedure and/or termination procedure.

This Policy shall be reviewed at a minimum, as part of the mandatory Management Review process for its continuing suitability. It shall be communicated to workers as part of the compulsory Induction process and upon subsequent changes.



James Copperwait
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Focus Group Logistics Ltd
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