

			Modern Slavery, Human Trafficking and Ethical Recruitment Statement			Risk Rating	High	
Reference:	CP 067	Issue:	C	Reviewer:	A.Brittin HR Admin	Approver:	L.Nicholson Head of People	<i>L. Nicholson</i>
Issue Date:		27.08.26	Compliance Date:		27.08.26	Planned Review Date:	27.08.27	

Introduction

This Statement applies to Buffaload Logistics Limited ("Buffaload" or "the Company").

Buffaload Logistics operates its Head Office in Ellington, Cambridgeshire, together with transport and warehousing operations in Crewe; Skelmersdale; Coventry; Bellshill; Avonmouth, Bristol; and Ely.

Buffaload is committed to conducting business ethically and responsibly and has a zero-tolerance approach to modern slavery, forced labour, human trafficking, and labour exploitation in all forms.

This Statement should be read in conjunction with the Labour & Human Rights Policy, Supplier Code of Conduct Policy, Recruitment Policy, Equality, Diversity, Inclusion & Equity Policy, and Whistleblowing Policy.

Our Commitment

Buffaload is committed to ensuring that modern slavery and human trafficking do not take place within our operations, labour supply chains, or wider supply chain network.

Modern slavery includes, but is not limited to:

- Human trafficking.
- Forced, bonded or compulsory labour.
- Servitude.
- Labour exploitation.
- Child labour.
- Debt bondage.
- Restriction of freedom of movement.
- Withholding of identity documents.
- Physical, psychological, or financial coercion.

We recognise that modern slavery can occur in any sector and are committed to identifying, preventing, and addressing such risks wherever they may arise.

The Company will not knowingly conduct business with any organisation that supports, condones, or is found to be involved in modern slavery, forced labour or human trafficking.

Modern Slavery Objectives

Buffaload aims to:

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- Prevent modern slavery, forced labour, child labour and human trafficking throughout its operations and supply chains.
- Promote ethical recruitment and responsible labour practices.
- Protect the rights, dignity, and wellbeing of all workers.
- Strengthen supplier awareness and compliance with modern slavery requirements.
- Increase employee awareness of modern slavery risks and indicators.
- Encourage the reporting of concerns without fear of retaliation.
- Continuously improve due diligence, monitoring and risk management processes.
- Support collaborative efforts to eradicate modern slavery within the logistics and supply chain sectors.

Ethical Recruitment

Buffaload is committed to ethical recruitment practices and will ensure that:

- Employment is freely chosen.
- No worker is charged recruitment fees, deposits, or placement fees.
- Workers retain possession of their own passports, identity documents, and personal belongings.
- Terms and conditions of employment are communicated before employment commences.
- Recruitment practices are transparent, fair, and compliant with applicable legislation.
- Migrant workers receive the same rights, protections, and support as all other workers.
- Labour providers are subject to due diligence before engagement.
- Age verification checks are completed before employment commences.
- Workers are free to terminate their employment in accordance with legal and contractual requirements.

Risk Assessment and Due Diligence

Buffaload recognises that certain sectors and labour markets may present a higher risk of modern slavery and human trafficking.

The Company undertakes risk assessments and due diligence activities including:

- Supplier approval and onboarding assessments.

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- Supplier Code of Conduct compliance reviews.
- Modern slavery questionnaires.
- Review of labour providers before engagement.
- Recruitment agency due diligence audits.
- Human Rights Impact Assessments.
- Internal Human Rights audits.
- Periodic supplier reviews.
- Monitoring of high-risk suppliers and labour providers.
- Contractual obligations requiring suppliers to comply with modern slavery legislation.

Supplier contracts contain provisions enabling corrective action, suspension, or termination where modern slavery concerns are identified.

Buffaload is a member of SEDEX and actively uses responsible sourcing and ethical business practice frameworks to support supply chain due diligence.

Accountability

The Board of Directors retains overall accountability for preventing modern slavery and human trafficking.

The Compliance Director, Head of People, Procurement Team and Senior Leadership Team are responsible for:

- Implementing this Statement.
- Monitoring modern slavery risks.
- Conducting supplier due diligence activities.
- Reviewing KPI performance.
- Investigating reported concerns.
- Managing corrective action plans.
- Reporting significant risks through the Company's governance processes.
- Promoting ethical recruitment and labour practices.

Managers are responsible for identifying concerns and escalating any potential risks appropriately.

All employees have a responsibility to report concerns regarding suspected modern slavery or human trafficking.

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Remediation and Victim Support

Where concerns regarding modern slavery, forced labour, child labour or human trafficking are identified, Buffaload will take immediate action to protect affected individuals.

Actions may include:

- Immediate safeguarding of affected individuals.
- Removal from harmful situations where appropriate.
- Investigation of allegations.
- Engagement with appropriate authorities and support organisations.
- Corrective action plans for suppliers, labour providers, or contractors.
- Access to support and wellbeing services.
- Additional monitoring and audits.
- Suspension or termination of supplier relationships where serious breaches remain unresolved.

Buffaload will monitor the effectiveness of corrective actions and take additional measures where required to prevent recurrence.

Reporting Concerns

The Company encourages employees, agency workers, contractors, suppliers, and other stakeholders to raise concerns regarding modern slavery and human trafficking.

Concerns may be raised through:

- Line management.
- Human Resources.
- Compliance Team.
- Whistleblowing arrangements.

Reports can be made confidentially via Safecall:

Safecall Confidential Reporting

Online: [Safecall Reporting Portal](#)

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Freephone: Safecall Freephone Numbers

No individual will suffer retaliation for raising a genuine concern in good faith.

Modern Slavery KPIs and Targets

KPI	Target
Employees completing Modern Slavery Awareness Training	100%
Labour providers reviewed through due diligence process	100%
High-risk suppliers assessed for modern slavery risks	100% annually
Modern slavery concerns investigated	100%
Confirmed incidents of forced labour	0
Confirmed incidents of human trafficking	0
Confirmed incidents of child labour	0
Human Rights Impact Assessment completed	Annually
Modern Slavery Statement reviewed	Annually
Supplier audits completed against annual audit programme	100%

Monitoring and Reporting

Compliance with this Statement will be monitored through:

- Supplier due diligence reviews.
- Supplier audits.
- Labour provider audits.
- Human Rights Impact Assessments.
- Internal audits.
- Recruitment audits.
- Training completion records.
- Whistleblowing reports.

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- Grievances and complaints.
- Modern slavery risk assessments.
- Supplier corrective action plans.

Performance against KPI targets will be reviewed annually by the Senior Leadership Team and corrective actions implemented where improvements are required.

Continuous Improvement

Buffaload Logistics is committed to continuously improving its approach to preventing modern slavery and human trafficking.

The Company will regularly review:

- Modern slavery risk assessments.
- Supplier performance.
- Recruitment and labour provider controls.
- Training effectiveness.
- Audit findings.
- Legislative developments.
- Industry best practice.
- Human Rights Impact Assessment outcomes.

Any improvements identified will be incorporated into future policies, procedures, supplier requirements, awareness programmes, and training activities.

Approval

This Statement has been approved by the Board of Directors and will be reviewed annually.

Buffaload Logistics remains committed to protecting human rights, preventing exploitation, and promoting ethical and responsible business practices throughout its operations and supply chains.