

Modern Slavery Transparency Statement

1. Introduction

This is the fourth statement published in accordance with the Modern Slavery Act 2015 and sets out the necessary steps taken by Associated British Ports (ABP) during the previous year to ensure that no slavery, forced labour or human trafficking is taking place in ABP's supply chain or in any part of ABP's business. ABP's previous statements can be found via the following link: (<https://www.abports.co.uk/marine-information-and-compliance/modern-slavery-statement/>).

Modern slavery is a crime and a violation of fundamental human rights which takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

ABP does not tolerate or condone abuse of human rights within any part of ABP's supply chain or business and will take seriously any allegations that human rights are not being properly respected. ABP also continues to reinforce its commitment to operating in an ethical manner and with integrity.

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2. ABP's Business & Supply Chain

ABP is the UK's leading ports operator. As the main operating company within the overall ABP group of companies, ABP employs over 2,000 individuals across the UK and facilities within its Statutory Harbour Authority jurisdictions handle approximately a quarter of the country's seaborne trade.

The principal activities of ABP comprise the ownership, operation and development of port facilities and provision of related services to ship and cargo owners and users of sea ports in the UK. ABP also owns and operates an inland rail freight terminal which handles sea freight containers.

Together with its customers, ABP supports 119,000 jobs around Britain and contributes approximately £7.5 billion of gross value to the UK economy every year. Delivering jobs and driving growth are key to ABP fulfilling its core purpose of "Keeping Britain Trading".

ABP's current supply chain is extensive with a significant number of suppliers providing a broad range of goods, services and works to ABP.

ABP's supply chain can broadly be broken down into the following six procurement categories:

1. **Infrastructure Projects:** development, design and engineering services, project management, construction delivery, cost and commercial services (e.g. quantity surveying support);
2. **Port Specific Equipment:** plant and equipment for lifting materials, moving materials, moving people and marine equipment.
3. **Maintenance, Repair and Overhaul:** services, spares and tools relating to maintaining, repairing and overhauling ABP's assets.
4. **Utilities:** supply of electricity, gas and water, removal of waste, fuels, renewable energy generation, metering and related consultancy.
5. **Facilities Management & Property:** facilities management, property, technical and legal services and minor works.
6. **Business Support Services:** quayside contractors and stevedores, business consultancy, IT, HR, finance, marketing & communications and compliance related services.

3.

Modern Slavery Risk Within ABP's Business & Supply Chain

As ABP's business operations are generally carried out in the UK, the risk of modern slavery taking place in ABP's business is relatively low compared to other organisations which carry out certain activities in jurisdictions which are considered higher risk. However, it is a known issue that ports can be used as an entry route into the country for human trafficking. It is also a known issue that crews on vessels from other jurisdictions using a port can sometimes be forced to work in sub-standard conditions. ABP works closely with the relevant authorities in relation to these issues and ABP's Anti-Slavery and Human Trafficking Policy includes guidance for ABP employees about what to do if they have any concerns about these issues.

In respect of ABP's supply chain, there are certain areas which have been identified as giving rise to a potentially greater risk of modern slavery occurring and therefore warrant further investigation and focus. These include:

Construction

ABP is constantly developing its port facilities and this typically involves contractors carrying out development activities on ABP's behalf, including in relation to significant infrastructure projects. The construction industry has identified that modern slavery is an issue for the UK construction industry due to the risk of vulnerable workers being exploited. In addition, the procurement of raw materials used in construction may be sourced from higher risk jurisdictions.

PPE

Although ABP procures its PPE from a UK supplier, parts of the PPE are manufactured in higher risk jurisdictions.

Port Equipment

ABP procures some of its significant port equipment (such as cranes) from outside of the UK and parts of the equipment may be manufactured in high risk jurisdictions.

Facilities Services

ABP procures significant cleaning and security services across the group and such services are generally provided via agencies.

Stevedoring Services

ABP procures significant stevedoring and other quayside services across its various ports with some of these services being provided via agencies or similar providers of contingent labour services.

4. ABP's Approach to Procurement & Transparency in Supply Chains

In 2018, ABP began a strategic review of its procurement processes and this review is continuing into 2020. ABP currently has approximately 3,130 active suppliers (most of which are based in the UK) and continues to simplify its supply chain in order to reduce that number. This will enable ABP to have more focus and control over its supply chain.

The following actions have also been undertaken since the publication of ABP's 2019 Statement:

- implementation of an online Supplier Portal to manage the registration, sourcing and selection of suppliers. The portal includes classification and qualification questions to support the measuring and monitoring of the percentage of ABP's key suppliers identified as high risk suppliers, as well as the percentage of high risk suppliers that have modern slavery and/or responsible procurement policies in place and reporting internally on those statistics periodically; and
- implementation of a ABP Supplier Code of Conduct which sets out a clear set of ethical principles which ABP will require its suppliers to adhere to.

Through the supplier selection and onboarding process ABP asks for confirmation from its suppliers that they employ robust procedures for ensuring that slavery, forced labour and human trafficking are eliminated from their supply chain.

In 2020, ABP expects to:

- continue to strategically review ABP's supply chain, with the aim of removing the details of suppliers' who have not contracted with ABP in the last year from the Supplier Portal. This will help to ensure that ABP only keeps the records and details of suppliers who ABP have actively approved; and
- continue to roll out the use of the online Supplier Portal for use by ABP's regional teams.

ABP is alive to the impact and challenges that COVID-19 has had and continues to have on ABP's supply chain, particularly with respect to resource availability and extended response times. In this regard, ABP continues to work in a constructive manner with affected suppliers in order to manage such impact and challenges.

5.

Policies & Contractual Controls

ABP seeks to continually promote a business culture and behaviours that are in line with its company values. These values are core to how we do business and set out what our customers and colleagues should expect to see. The behaviours that underpin each value are embedded in our business and reflect ABP's commitment to ensuring that everyone is treated fairly and consistently, thereby engendering a workplace that is open, honest, inclusive and collaborative. We strive to maintain a business environment in which individuals, customers and suppliers are encouraged to speak up when they see that our high standards are not being met. Our policies and procedures relating to modern slavery are in line with our culture and values.

ABP has a number of internal policies which underpin ABP's commitment to ensuring no slavery, forced labour or human trafficking takes part in ABP's supply chain or in any part of ABP's business. These include:

- the ABP Anti-Slavery & Human Trafficking Policy, which demonstrates ABP's commitment to the issues of modern slavery and forced labour and ensures that there is focus within the business on this issue;
- a Whistleblowing Policy which provides a way for employees or any other person to anonymously report any wrongdoings including any concerns that they may have. All reports are fully investigated;
- an Employee General Code of Conduct which sets out clear expectations of how ABP expects its employees to conduct business on its behalf.
- ABP's Supplier Code of Conduct and procurement procedures as referred to above; and
- specific modern slavery contractual provisions in ABP's standard form of contracts so that our suppliers and business partners know what is expected of them.

Although the risk of modern slavery taking place within ABP's business is much lower than through our supply chain, our recruitment procedures incorporate several steps that are designed to eliminate any such risks. These include:

- carrying out rigorous “right to work” checks to confirm a prospective employee’s eligibility to work in the UK and ensuring that any agencies used to supply temporary workers carry out equivalent checks. In light of the challenges to movement imposed by COVID-19, we have modified the process by which such “right to work” checks are carried out so as to ensure that the checks can continue despite the current challenges;
- carrying out pre-employment checks to verify the identity of prospective employees and to ensure that such employees are aged over 16;
- ensuring that an employment contract is in place with each employee prior to the commencement of their employment at ABP; and
- ensuring that the bank accounts to which salaries are paid match the name of the relevant employee.

Throughout 2019 and into 2020, ABP has increased its permanent headcount and reduced the number of contractors within our workforce, allowing ABP to exercise greater control over recruitment and on boarding processes. ABP also maintains healthy relationships with its trade union partners. Matters such as ABP’s terms and conditions of employment, learning and development and business change and strategy are often discussed at these meetings.

ABP continues to monitor the risks and challenges imposed by COVID-19 and is mindful that fluctuations in demand and changes in ABP’s operating model as a result of COVID-19 may lead to new or increased labour exploitation risk. Accordingly, ABP has adapted many of its procedures, activities and priorities in response to this. For example:

- ABP recognises that the steps set out in the recruitment procedures above are even more essential in order to protect vulnerable workers (and has adapted them as appropriate in relation to COVID-19);
- ABP has been working with local resilience forums to discuss increased risks associated with COVID-19 and has also been liaising with representatives from bodies such as Border Force and port security;
- given the new ways of working due to COVID-19, ABP has ensured that procedures are in place to allow remote reporting of employee grievances; and
- ABP has put in place detailed risk assessments and guidance (reflecting the Government and Public Health England’s guidelines) on how to stay safe in the workplace regarding COVID-19 and communicated these to both workers and unions.

6. Awareness

ABP periodically reminds its employees of the Modern Slavery Act 2015 and the ABP Anti- Slavery & Human Trafficking Policy through its internal communications. We recognise that the risk of modern slavery is ongoing and as such, ABP will keep under review the guidance and whether any specific training may be required.

7. Review of ABP's Progress

ABP is committed to improving its practices to combat slavery and human trafficking. Over the previous year ABP has continued to make progress in seeking to ensure that its supply chain environment remains free from slavery, forced labour and human trafficking. ABP has progressed its strategic review of its procured goods, services and works and has continued to develop its central and regional procurement function across the ABP group. ABP has also made adjustments as appropriate to address some of the challenges and risks which have arisen in relation to COVID-19.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ABP's slavery and human trafficking statement for the financial year ended 31 December 2019. This statement has been approved by ABP's board of directors.

Signed by



**Chief Executive Officer on behalf of
Associated British Ports**

