



# MODERN SLAVERY - POLICY STATEMENT

## RHENUS WAREHOUSING SOLUTIONS LUTTERWORTH LTD MODERN SLAVERY STATEMENT

### Introduction

Rhenus Warehousing Solutions Lutterworth is committed to ensuring that our team understand the risks and impact of modern slavery. We are not legally required to produce a Modern Slavery Statement, but have opted to produce a voluntary statement as part of our commitment to upholding our values.

Despite the abolition of traditional slavery in the 19th century, slavery still exists today in many forms. Fortunately, very few governments sanction these activities, but they are still widespread and occur in almost every country in the world. The term 'Modern slavery' encompasses activities such as the following:

- Human trafficking
- Forced labour
- Bonded labour
- Child slavery
- Domestic slavery
- Slavery in supply chains

The 2017 Estimates of Modern Slavery Report suggests that 24.9m people were victims of forced labour in 2016, with a further 15.4m in forced marriages, which is also considered a form of slavery.

### Organisational Structure

Rhenus Warehousing Solutions Lutterworth is a third party logistics provider with services ranging from storage of goods, VAT/duty deferment, transport and value added services such as repackaging and embroidery. As such, we in turn use many suppliers to provide these services. We have over 300 employees in the UK, across 4 sites. Our head Office is at the following address:

Rhenus Warehousing Solutions Lutterworth Limited  
Vulcan Way  
Magna Park  
Lutterworth  
LE17 4XR

We are part of Rhenus SE & Co KG in Germany.

### Our Supply Chain

We regularly liaise with our labour providers and transport partners to ensure that they are guarding against human trafficking and forced labour in their own organisations. Any of our suppliers who are subject to the provisions of the Modern Slavery Act must produce their own Modern Slavery Statement and we review all such statements as and when they become available.

Over half of our workforce is made up of non-UK citizens and we are diligent in our referencing process to ensure that all of these employees have the right to work in the UK. However, this does not necessarily confirm that they are working for us by choice and we have implemented new policies and processes to make sure that this is the case.

## Our Risks

The primary areas of risk for Rhenus Warehousing Solutions Lutterworth with regard to Modern Slavery are:

- Non-UK employees
- Third party labour

## Due Diligence

Although UK citizens may be victims of forced labour, human trafficking generally involves the exploitation of migrant workers. Therefore, the risk is greater when employing large numbers of non-UK citizens. In order to combat this, we have implemented policies and processes to increase vigilance and spot warning signs. These processes include:

1. Cross-referencing bank information to spot payments made to multiple employees but into the same bank account. This is often the case when an individual is exerting control over a group of individuals.
2. Regular review of bank accounts to identify occurrences where the employee name and account name are different
3. Regular review of employee addresses, to determine whether multiple employees reside at the same address, a common sign of exploitation.
4. Training supervisors and managers to spot signs of malnutrition or abuse among employees
5. Actively encouraging employees to come forward with any concerns or suspicions regarding possible exploitation and making the reporting process clear

Alongside our directly-employed staff, Rhenus Warehousing Solutions Lutterworth also utilises temporary labour via a labour agency. We also sometimes use employment agencies to fill permanent vacancies. Some of these third party providers are considered 'large' companies for the purposes of the Modern Slavery Act and are therefore responsible for publishing their own Modern Slavery Statement and implementing similar processes to those outlined above. However, we do not simply rely on these measures and intend to draft a questionnaire for completion by labour providers to ensure that they are satisfying our requirements as well as their own. These questionnaires will be held on file and updated annually, which will allow us to monitor any changes in policy/processes by our suppliers.

## Effectiveness

Despite the overwhelming global statistics in relation to modern slavery, we do not anticipate a high volume of occurrences within Rhenus Warehousing Solutions Lutterworth, which will make it difficult to monitor the effectiveness of our policies and processes from a purely quantitative point of view. Therefore, we intend to measure the diligence of our processes comparatively, as follows:

- Number of staff trained on Modern Slavery initiatives
- Number of assessments completed on bank and address information
- Number of cases of suspected exploitation reported
- Action taken as a result of these reports
- Volume and frequency of questionnaires completed by suppliers
- General feedback from employees
- Number of actual cases of Modern Slavery identified and the action taken in those cases