POLMOD – Modern Slavery Policy

1 – Policy Statement

Liam Connolly (Roadfreight) Ltd is committed to conducting business ethically, responsibly and with integrity.

The Company has a zero-tolerance approach to modern slavery, forced labour, human trafficking, servitude and exploitation in all its forms.

We are committed to ensuring that modern slavery does not occur within:

- Our business operations.
- Our workforce.
- Our supply chains.
- Our transport activities.
- Our contractor and agency relationships.

The Company expects all employees, suppliers, contractors, recruitment agencies and business partners to share this commitment.

2 – Purpose

The objectives of this policy are to:

- Prevent modern slavery and human trafficking.
- Promote ethical employment practices.
- Protect vulnerable workers.
- Ensure lawful recruitment practices.
- Support responsible supply chain management.
- Encourage reporting of concerns.
- Demonstrate compliance with legal and customer requirements.

3 – Scope

This policy applies to:

Employees

- HGV Drivers.
- Warehouse Operatives.
- Forklift Operators.

- Yard Personnel.
- Office Staff.
- Cleaning Staff.
- Supervisors and Managers.

Third Parties

- Agency Workers.
- Labour Providers.
- Contractors.
- Suppliers.
- Service Providers.
- Recruitment Agencies.

The policy applies throughout all Company operations.

4 – What is Modern Slavery?

Modern slavery can take many forms including:

- Human trafficking.
- Forced labour.
- Debt bondage.
- Servitude.
- Child labour.
- Forced criminality.
- Exploitation of vulnerable workers.

Modern slavery may involve:

- Threats or coercion.
- Physical or psychological abuse.
- Restriction of movement.
- Confiscation of identity documents.
- Withholding of wages.
- Exploitative working conditions.

5 – Company Commitment

The Company is committed to:

- Treating all workers fairly and lawfully.

- Paying employees correctly and on time.
- Respecting employment rights.
- Providing safe working conditions.
- Preventing exploitation.
- Investigating concerns promptly.
- Taking action where risks are identified.

6 – Recruitment and Employment Practices

The Company will seek to ensure that:

- Employment is freely chosen.
- Workers are employed voluntarily.
- Employment contracts are transparent.
- Employees understand their terms and conditions.
- Workers retain control of their own identity documents.
- Recruitment fees are not charged unlawfully.
- Employees are free to leave employment in accordance with contractual arrangements.

The Company will not knowingly engage in practices associated with modern slavery.

7 – Agency Workers and Labour Providers

Where agency workers are utilised, the Company will seek to work only with reputable labour providers.

The Company expects labour providers to:

- Comply with employment legislation.
- Operate ethical recruitment practices.
- Prevent worker exploitation.
- Cooperate with audits and enquiries where appropriate.

Concerns relating to agency workers will be investigated promptly.

8 – Supplier Expectations

The Company expects suppliers and contractors to:

- Comply with applicable laws.

- Prevent modern slavery within their operations.
- Operate ethical labour practices.
- Cooperate with reasonable enquiries regarding labour standards.

The Company reserves the right to review supplier arrangements where concerns arise.

9 – Employee Welfare

The Company seeks to maintain a workplace where employees:

- Are treated with dignity and respect.
- Are free from coercion.
- Have access to grievance procedures.
- Can raise concerns without fear.
- Receive appropriate support where required.

The Company encourages employees to speak up if they have concerns regarding exploitation.

10 – Transport & Logistics Risks

The Company recognises that the transport sector may encounter risks relating to:

- Human trafficking.
- Illegal immigration.
- Smuggling.
- Stowaways.
- Organised criminal activity.

Drivers and operational staff must remain vigilant and report suspicious activity.

11 – Vehicle Security and Border Controls

Drivers involved in cross-border and international movements must:

- Conduct vehicle security checks.
- Inspect trailers and load compartments.
- Follow Company security procedures.
- Report evidence of tampering.
- Report suspected stowaways immediately.

The Company's Operational Security Policy shall apply.

12 – Recognising Warning Signs

Employees should be aware of potential indicators of exploitation including:

- Individuals appearing fearful or intimidated.
- Workers who are unable to communicate freely.
- Individuals whose documents are controlled by others.
- Signs of physical abuse.
- Unusual living or working arrangements.
- Workers who appear under the control of another person.

The presence of one indicator does not necessarily confirm exploitation, but concerns should be reported

13 – Reporting Concerns

Employees are encouraged to report concerns regarding:

- Worker exploitation.
- Human trafficking.
- Forced labour.
- Suspicious recruitment practices.
- Suspicious transport activities.
- Potential victims of modern slavery.

Reports may be made through:

- Line Management.
- Senior Management.
- Company Directors.
- The Company's Whistleblowing Procedure.

Concerns raised in good faith will be taken seriously.

14 – Protection for Reporting Individuals

No employee will suffer retaliation for raising a genuine concern regarding modern slavery or human trafficking.

The Company will not tolerate:

- Victimisation.
- Harassment.
- Retaliation.
- Intimidation.

Such behaviour may result in disciplinary action.

15 – Investigating Concerns

The Company will investigate concerns appropriately and proportionately.

Investigations may involve:

- Interviews.
- Employment record reviews.
- Supplier enquiries.
- Agency worker reviews.
- Security investigations.
- Liaison with relevant authorities.

Where necessary, external agencies may be informed.

16 – Training and Awareness

Relevant employees may receive training covering:

- Modern slavery awareness.
- Human trafficking indicators.
- Ethical employment practices.
- Reporting procedures.
- Supply chain risks.

Particular emphasis may be placed on:

- Drivers.
- Managers.
- Recruitment personnel.
- Warehouse Supervisors.

17 – Responsibilities

Employees

Employees must:

- Remain vigilant.
- Report concerns.
- Cooperate with investigations.
- Treat others with dignity and respect.

Managers

Managers shall:

- Promote awareness.
- Take concerns seriously.
- Escalate reports appropriately.
- Support investigations.

Senior Management

Senior Management shall:

- Demonstrate commitment to ethical practices.
- Review risks periodically.
- Support policy implementation.
- Promote continuous improvement.

18 – Breaches of Responsibility

The Company will take appropriate action where:

- Exploitation is identified.
- Ethical standards are breached.
- Individuals fail to report serious concerns.
- Suppliers fail to meet expected standards.

Serious breaches may result in termination of contracts, disciplinary action or referral to authorities.

19 – Related Policies

This policy should be read alongside:

- Whistleblowing Policy.
- Equality, Diversity & Inclusion Policy.
- Operational Security Policy.
- Anti-Bribery & Anti-Corruption Policy.
- Recruitment & Selection Policy.
- Grievance Procedure.
- Disciplinary Procedure.
- Health & Safety Policy.
- Supplier Approval Procedures.

20 – Policy Review

This policy shall be reviewed annually or sooner if:

- Legislation changes.
- Business activities change.
- Significant incidents occur.
- Customer requirements change.