



ANTI MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

Introduction

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the actions taken by all subsidiary companies of Kinaxia Limited ("the **Group**") to prevent modern slavery and human trafficking risks related to its business. A full list of the Group's current subsidiaries is set out in the Schedule. This statement relates to actions and activities taken by the Group during the financial year 1 January 2024 to 31 December 2024 to ensure that there is no slavery or human trafficking in its own business and its supply chains.

As part of the transport and warehousing industry, the Group recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

The Group is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from modern slavery and human trafficking.

The Group Structure and Supply Chains

This statement covers the activities of the Group.

The Group operates in the logistics industry, with its focus on transport and warehousing of products for external companies, which can involve picking and packing products stored in any of the Group's warehouses.

Countries of operation and supply

The Group currently operates in the UK.

The Group's main purchases include fuel, office equipment, uniforms, tyres and parts for vehicles that have been purchased or leased from European manufacturers.

High-risk activities

The following activities are considered to be at high risk of modern slavery or human trafficking: if the Group doesn't have sufficient staff of its own, typically drivers or warehouse staff, we will either use temporary agency staff or subcontract the work.

The Group has four main categories of employees: drivers, warehouse, workshop and administration. As the Group operates in the UK, whilst it might handle products imported by our customers, there is limited scope for any of the Group's direct activities to be exposed to modern slavery or human trafficking.

Responsibility

Responsibility for the Group's anti-modern slavery and human trafficking initiatives are as follows:

- **Policies:** the Group HR Director is responsible for putting in place and reviewing policies and the process by which they are developed to ensure they meet all UK Employment Legislation requirements including the National Minimum Wage.
- **Risk assessments:** the Group's board of directors have ultimate responsibility for human rights and the Group's strategy, including overseeing day-to-day implementation, and within the local operations, the Senior Management team of each company within the Group maintain an ongoing assessment of the risk of exposure to modern slavery and human trafficking.

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- **Investigations/due diligence:** we will take any cases or suspicions of modern slavery and human trafficking seriously and investigate any concerns thoroughly. There are no known or suspected instances of modern slavery and human trafficking in the 2023 – 2024 financial year.

Relevant Policies

The Group has implemented the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** the Group encourages its workforce, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the Group. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The Group's whistleblowing procedure has been designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee Code of Conduct:** the Group's code of conduct has made it clear to employees the actions and behaviour expected of them when representing the Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and managing its supply chain.
- **Right To Work Policy:** the Group has a duty to prevent illegal working and carries out relevant document checks to ensure each person employed is legally allowed to do the work in question.

Due Diligence

The Group undertakes ongoing due diligence and risk assessments of its supply chain and operations. This includes when considering taking on new suppliers, and periodically reviews its existing suppliers.

In some of the Group's outward-facing contracts there are obligations imposed on the supply chain relating to compliance with applicable laws. In the event that the Group becomes aware of a breach of applicable laws, its contractual rights may include a right of termination, in addition to a right to make regulatory and/or criminal reports.

Training

The Group recognises the importance of training staff, including through implementation of its policies, and will look to deliver a comprehensive training programme at key levels of the business during the 2025 or early 2026 financial years, taking into account updated government guidance in the area.

Approval

This statement has been approved by the Group's board of directors on 30 June 2025, who will review and update it annually.

A handwritten signature in black ink, appearing to read 'G. Cox'.

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Graham Cox
Group Chief Executive Officer, 1 July 2025



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Schedule

Mark Thompson Transport Ltd

A. J Maiden and Son Limited

Panic Transport (Contracts) Limited

Bay Freight Limited

William Kirk Limited

BC Transport (Bollington) 1991 Limited

BC Transport 2017 Limited

N. C. Cammack & Son Limited

Cammack Limited

Foulger Transport Limited

GAG57 Limited

Lambert Brothers Haulage Limited

Lambert Brothers Holdings Limited

AKW Global Logistics Ltd

A K Worthington Ltd

AKW Global Logistics Birmingham Ltd

AKW Global Warehousing Ltd

AKW Group Limited

AKW Warehousing Ltd

Global Logistics (UK) Ltd

Kinaxia Logistics & Fulfilment Ltd (formerly AKW Global Warehousing Ltd)

Kinaxia Logistics Limited

Kinaxia Logistics Training Limited

Fresh Freight Limited

Internet Distribution Highway Limited

Specialist Logistics Solutions (SLS) Limited

David Hathaway Transport Limited

Flybikefly Limited

Flybikefly.com Limited

Kinaxia Transport & Warehousing Ltd