

Modern Slavery Transparency Statement

Relating to the period from 1 January 2022 to 31 December 2022



1. Introduction

This is the seventh statement published in accordance with Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and sets out the steps taken by Associated British Ports (**ABP**) during 2022 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.

This statement has been approved by the Board of ABP and has been signed by the Chief Executive Officer of ABP.

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.

In this document:

1. Introduction
pg. 2

2. ABP's Business & Supply Chain
pg. 3

3. Modern Slavery Risk Within ABP's Business & Supply Chain
pg. 4

4. ABP's Approach to Procurement & Transparency in Supply Chains
pg. 5

5. Policies & Contractual Controls
pg. 6-7

6. Awareness
pg. 8

7. Review of ABP's Progress
pg. 8



2.

ABP's Business & Supply Chain

ABP is the UK's leading ports operator. As the main operating company within the ABP group of companies, ABP employs over 2350 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 the provision of related services to ship and cargo owners and the users of seaports in the UK.

Together with its customers, ABP supports c.119,000 jobs around Britain and contributes approximately c. £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". We are redefining what Keeping Britain Trading means in the greener, cleaner economy of the future. This is reflected in the launch of our sustainability strategy, Ready for Tomorrow, which sets out our plan to reach net zero greenhouse gas emissions from our own operations by 2040 and enable the UK's energy transition.

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 procurement categories:

Infrastructure Projects: development, design and engineering services, project management, construction delivery, cost, and commercial services (e.g. quantity surveying support);

Port Specific Equipment: plant and equipment for lifting materials, moving materials, moving people and marine equipment.

Maintenance, Repair and Overhaul: services, spares and tools relating to maintaining, repairing, and overhauling ABP's assets.

Utilities: supply of electricity, gas and water, removal of waste, fuels, renewable energy generation, metering, and related consultancy.

Facilities Management & Property: facilities management, property, technical and legal services, and minor works.

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 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 and stakeholders in relation to these issues. 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. During the course of 2022, we focused on increasing the awareness of our front-line workers on how to spot and report potential red flags in relation to any human trafficking through our ports (*see section 6 for more information about this*).

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. 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. Modern slavery is an issue for the UK construction industry due to the risk of vulnerable workers being exploited. In addition, 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 may be 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, resulting in ABP having less visibility of the workforce and terms of employment used.

Stevedoring Services: ABP procures significant stevedoring and other quayside services across its ports. Some of these services are provided via agencies or similar providers of contingent labour services, again resulting in ABP having less visibility of the workforce and terms of employment used.



4.

ABP's Approach to Procurement & Transparency in Supply Chains

Through ABP's 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.

Some other key points to note include:

- ABP uses an online Supplier Portal to manage the registration, sourcing and selection of suppliers, and other supplier data verification processes.
- We carry out an annual business ethics compliance "check in". As part of this process, ABP writes to a selection of suppliers asking them to declare any non-compliance or issues in regard to certain matters (including in relation to any modern slavery issues in connection with their supply of goods or services to ABP). Any potential issues or red flags are followed up.
- In response to the potential risk posed by ABP's procurement of PPE that may be partly manufactured in high-risk jurisdiction, we are increasingly choosing to procure products from companies that hold an SA8000 certification, which demonstrates that the supplier takes steps to focus on employees' rights and wellbeing, offering them a safe place to work and good working conditions.
- In 2023 ABP will be refreshing our Supplier Code of Conduct.. We will also be reviewing and where appropriate updating our internal procedures in relation to the checks that we carry out in relation to modern slavery.



5. Policies & Contractual Controls

ABP is committed to conducting all aspects of its business in an honest, ethical and safe manner and to maintaining the highest possible standard of integrity in all our business dealings. ABP is also committed 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 consistent with this.

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:

- ABP's 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 these issues. This Policy is reviewed and updated (as appropriate) on an annual basis;
- a Whistleblowing Policy which provides a way for employees or any other person to anonymously raise concerns or provide information that they believe shows wrongdoings. All reports are appropriately investigated;
- an Employee General Code of Conduct which set out clear expectations of how ABP expects its employees to conduct business on its behalf; 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 some areas of our supply chain, our recruitment procedures incorporate several steps that are designed to eliminate any such risks. These include:

- carrying out "right to work" checks on day one of employment to confirm



an employee's eligibility to work in the UK.

- using a system of “preferred suppliers” for agencies supplying temporary workers to ABP. Part of the selection procedure for the preferred suppliers was an assessment of the checks that the agencies employ to assess right to work status of their temporary workers;
- 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.

ABP continues to aim to reduce the number of contractors within our workforce, allowing ABP to exercise greater control over the recruitment and onboarding processes. ABP maintains healthy relationships with its trade union partners and holds meetings with them on a regular basis. Matters such as ABP's terms and conditions of employment, learning and development, and business change and strategy are often discussed at these meetings.



6. Awareness

We recognise that the risk of modern slavery is ongoing. During 2022, ABP carried out the following steps to help raise the awareness of the risks of modern slavery and human trafficking:

- we created a Tool Box Talk which sets out key messages, including red flags to look out for both in everyday life and more specifically in our ports, and provided details on how to easily report any suspected human trafficking or modern slavery. The Tool Box Talk was delivered to our front line employees, including, operational, marine, engineering and compliance teams.
- we carried out a poster campaign which emphasized the key messages from the Tool Box Talk in a complimentary and eye catching manner. These were put up in staff rooms, mess rooms and displayed around all office locations. The posters carried messages which said
 - *“Human trafficking is the fastest-growing criminal industry in the world, with discoveries of trafficked migrants in shipping containers and trucks a regular occurrence at ports in the UK.*
 - *Look out for:*
 - *A person distressed afraid or unaware where they are*
 - *Individuals fearful of those they are with*
 - *Individuals being verbally abused by other crew members*
 - *Signs of abuse, trauma or malnourishment*
 - *Women and children on vessels*
 - *If you have your suspicions, do not approach them directly unless they come to you. Inform your Line Manager as soon as possible and/or contact the Police if you believe it to be an emergency.”*
- awareness communications to the business via company email newsletters.

This year ABP will continue with building awareness, by refreshing our training modules, and creating further visual reminders.

7.

Review of ABP's Progress

ABP is committed to improving its practices to combat slavery and human trafficking. During 2022, we worked to increase awareness of modern slavery and human trafficking by way of a new poster campaign and rolling out a new tool box talk.

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 2022. This statement has been approved by ABP's board of directors.

Signed by



Chief Executive Officer on behalf of
Associated British Ports