
Summary from Trans Ocean Bulk Logistics Limited

Modern slavery is a crime and a violation of fundamental human rights. It 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.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2019.

Organisational structure

Trans Ocean Bulk Logistics Ltd is a specialist Bulk Freight Forwarder of wines, spirits and other non-hazardous bulk liquids.

Trans Ocean Bulk Logistics Ltd is a wholly owned subsidiary of the JF Hillebrand Group, a network of over 53 offices located in 87 wine producing and consuming countries. The Group transports over 550,000 Teu and is the largest specialist carrier of beverage products worldwide

Since inception in 1844, the company has been dedicated solely to the efficient and cost-effective logistics of beverages. Today, we work with some of the world's leading retailers, producers and brewers to manage the global flow of beverages, with approximately 2500 staff within our network.

Exceptional service quality, coupled with an innovative and open approach to the movement of freight is key to maintaining the trust of our customers. Naturally we recognise that these guiding principles cannot be achieved without the valued support of our partner Carriers.

We therefore require our supplier partners to share our vision and commitment to our customers, embracing three essential elements; Minimising risk to our customers supply chain, Maximising reliability and Optimising costs. In turn, we aim at a consistently professional approach to our freight procurement and ongoing carrier relations.

Our organisation takes pride in being an innovative group, ever changing to the needs of the market in which we operate. As well as offering first class logistics services, our companies also lead the way in the development of leading edge products, services and IT tools for the industries in which they operate.

We provide solutions from wherever beverages are produced around the World, including consolidation and in market distribution. Whether moving single cases or full loads, or shipping bulk liquid, we provide simplified solutions encompassing every component of the end to end movement, including the Customs formalities and transit insurance. We can also help to optimise the overall efficiency of your Supply Chain using our award winning supply chain management solutions. However, while we continue to grow and expand our horizons, we also recognise that it is our people, ideas and values that enable us to do what we do.

Our global annual turnover is \$69,905,481

Our supply chain

Our Supply Chain: We are reliant upon third party organisations in two key areas of our operations:

1. Transportation of beverages from source (normally outside the UK) to the UK and onward delivery of these goods to our customer-base nationwide.

With these third party organisations, we have, or plan to have, systems and protocols in place to identify and mitigate risk. These include:

- Ensuring that all new suppliers adhere to our Code of Conduct which includes statements from them confirming that they abide by the Modern Slavery Act.
2. Methodically working through our existing supply-base to:
 - a. Identify and engage higher risk and higher volume suppliers to convey our Anti-Slavery policy to gain written assurance from them that they abide by our Code of Conduct. Our commitment is to have these undertakings in place by the end of 2019.
 - b. Work through the remaining suppliers, whether low risk or low volume, to ensure that by the end of 2019 all suppliers have been confirmed as confirming to our Code of Conduct.
 - c. Protecting any whistleblowers internal or external to our company
 - d. Putting in to place a rolling programme of review and spot-checking of all suppliers

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains. Through a due diligence process where our supplier's information and processes are checked on a yearly basis
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, through working with ethical suppliers and sub-contractors
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

We have various policies and practices in place to ensure internal adherence to the Modern Slavery Act 2015 including:

- Whistleblowing Policy
- Anti-Bribery Policy
- Monthly reviews of pay to ensure adherence to the national minimum wage
- Recruitment Policy
- Equal Opportunities Policy
- Dignity at work Policy
- Child Labour Policy

Further steps

This Modern Slavery statement can be found on our website and will be reviewed on an annual basis. Our customers and suppliers will be requested to confirm that they have adhered to the Modern Slavery Act 2015 and have processes and policies in place to mitigate the risk within their own Supply chain.



Kevin Fry

Director

Trans Ocean Bulk Logistics Ltd

Date: 12th December 2018