

# CLH-PS Modern Slavery and Human Trafficking Statement

Version 1

1 May 2020



This Statement made by CLH-PS is in accordance with the Modern Slavery Act (MSA) 2015.

## 1. Introduction

Modern Slavery and human trafficking is completely unacceptable in modern society and business plays an important role in tackling it. CLH-PS fully supports the principles of the Modern Slavery Act and takes a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain.

This statement outlines the steps taken during the 2019 financial year and our future plans to prevent slavery and human trafficking taking place in any part of our business or in any of our supply chains.

## 2. About CLH-PS

CLH Pipeline Systems is an oil product logistics company and owns, manages and operates the pipeline system network across the UK. We are a subsidiary of CLH Group which is based in Spain. Our mission is 'to solve the logistics needs of our customers by applying the latest technologies to provide them with the most efficient and reliable solutions in a safe and environmentally responsible manner'. Our financial year ends on 31<sup>st</sup> December.

Our Values within CLH-PS play an integral part in delivering our service. Ethics play a key role in every aspect of the business and enables us to achieve our Vision which is *'To be the FIRST CHOICE for both our customer and our employees by DELIVERING RESULTS IN A CULTURE OF TRUST'*.

Our business employs around 270 colleagues. While we do not believe we have a high risk, we can have most impact on modern slavery and human trafficking by focusing our efforts on our supply chain and so this is our priority.

## 3. Our Policies

CLH-PS aims to provide an environment that it is inclusive, rewarding and enable our colleagues to play an important part in the development of our business. We operate several internal policies/processes to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all colleagues know that they can raise concerns about how team members are being treated, or practices within our business or supply chain, without fear of reprisals.
- Bullying & Harassment Policy. Emphasising that this type of behaviour will not be tolerated, we outline how we will investigate and deal with any allegations.
- Fraud Policy. We outline the steps we take to reduce the opportunity for fraud and what action to take in suspected cases.
- Anti-Bribery & Corruption Policy. This document describes how we approach gifts and offers of hospitality to avoid opportunities for and allegations of bribery and corruption.
- Near miss reporting. This reporting is for individuals who have witnessed near miss incidents and any unsafe acts.

## CLH-PS

- Code of Conduct. CLH Group have put into place processes for reporting violations of the law or non-compliance with the Groups Code of Conduct and introduced an Ethics Committee whose aim is to monitor, promoting, disseminating, raising awareness and ensuring compliance with the Code of Conduct. In order to ensure our team members understand and comply with policies that govern working at CLH-PS, we ask everyone as part of their induction to read through our mandatory Code of Conduct. We are looking to improve the awareness of this across the business in 2020 by asking all colleagues to read and sign to commit to working within the Code of Conduct.

### 4. Our Suppliers

CLH-PS keeps the risks on ethical conduct in our supply chain under review. To ensure our supply chain reflects our values, ethics and code of conduct during our sourcing processes we include due diligence measures through the Achilles UVBD and/or our pre-qualification questionnaires.

Our standard procurement and contract documentation are continually reviewed and enhanced where necessary to ensure they address anti-slavery and anti-trafficking.

### 5. Training

As we anticipate the highest risk area to be our supply chain, we conduct training for our procurement team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. All our colleagues know that they should raise any suspicions around instances of modern slavery or human trafficking to their manager. Any new colleagues are briefed on our stance on modern slavery when they join us and we will be introducing e-learning on the subject for all CLH-PS colleagues in the 2020 financial year.

### 6. Previous Incidents

There were no reported incidents of Modern Slavery or Human Trafficking in CLH-PS Ltd or, to the best of our knowledge, in our supply chain during the 2019 financial year.

Approved on behalf of the CLH-PS Ltd Board:



**Nacho Casajus**

**CEO**

15 May 2020

