

Modern Slavery Statement for the financial year ending 31 December 2024

1. Introduction from top level management

Thermottraffic Ltd. is, and remains, fully committed to operating with integrity, honesty and in compliance with all relevant laws and regulations in the course of our business operations and or dealings. Accordingly, it continues to be a priority for Thermottraffic Ltd. to ensure that we trade ethically and with social responsibility, and persistently work to ensure we prevent modern slavery and human trafficking throughout our organisation and in our supply chain(s).

The UK Modern Slavery Act 2015 (the "Act") requires certain businesses to publicise the specific actions they have taken during the financial year to ensure modern slavery and or human trafficking is not taking place in their operations. The financial year ending 31 December 2024 is the first occasion upon which Thermottraffic Ltd. satisfy the legislative criterion of the Act, which now requires it to publicise this statement. Accordingly, this statement surmises the key activities, and positive steps, we have undertaken and are continuing to take to ensure that modern slavery and human trafficking does not take place within our supply chain(s) and or otherwise in any part of our business undertakings. Although this statement primarily focuses on the financial year ending 31 December 2024, it also encompasses key updates and progress made up to the date of publication to provide a transparent and current overview of our operations. It is provided pursuant to section 54, Part 6, of the Act.

We recognise and comprehend our responsibility to manage and seek to prevent the risks of human trafficking, forced, bonded and child labour and to respect everyone's human rights in our respective operations and our supply chain(s). Thus, we continuously review, audit and improve our practices to ensure that we have proper and effective responses to prevent, detect and remediate any negative impacts that potentially arise.

Our commitment to our stakeholders is clear – we will always treat people in our business and supply chain(s) fairly and with respect. We have a zero-tolerance approach to modern slavery and human trafficking.

2. Organisation's Structure

Thermottraffic Ltd. (company number: 01088811) is a private limited company that was formally incorporated on 28 December 1972 and formally adopted its current trading name in January 2024 following an overall 'Group' restructuring whereby it hived up the trade and net assets of its 100% owned subsidiaries. Moreover, in May 2024, Thermottraffic Ltd. acquired Admark Shipping Solutions Limited.

The registered office of Thermottraffic Ltd. is at the Northern Industrial Estate, Bury St Edmunds, Suffolk, England, IP32 6NL. However, its temperature-controlled division operates from 7 different sites throughout the United Kingdom and 2 forwarding offices on different locations. Thermottraffic Ltd. has annual turnover for the financial year ending 31 December 2024 in the sum of circa £38.7 million and directly employs (± 184 individuals).

Thermottraffic Ltd. is owned by Thermottraffic (N.I.) Ltd and is part of the wider Nichirei Group in Tokyo, Japan. As a global market leader in temperature-controlled logistics, the Nichirei Logistics Group Inc. has been represented in Europe for in excess of 30 years. The focus is on offering comprehensive, worldwide, temperature-controlled logistics solutions. The Nichirei Logistics Group has 225 locations worldwide, of which 52 are situated in Europe and the United Kingdom. The European Group of 'sister' companies can be located in France, Germany, the Netherlands and Poland.

3. Our Business

Thermottraffic Ltd. is a complete, temperature controlled, logistics service provider that is active for customers within the overarching food industry. We specialise in the provision of a one stop service for the worldwide logistics of food by offering comprehensive transportation, cold chain logistics and value added services for frozen, chilled or non-chilled products together with the importation and exportation of chilled, frozen, ambient, raw and cooked meat, poultry, fish and food products (including fresh produce, dairy and other products tailored for diverse markets). Our segments of business include manufacturers, producers, importers/ exporters, and traders.

We work internationally to develop and evolve routes to market for suppliers to work closely in conjunction with our customers by virtue of end-to-end supply chain solutions. This includes (but is not limited to) collection of containers from a production facility, ocean freight, customs documentation and clearance, inspections at Border Control posts, and onwards storage and delivery. We always aim to cultivate and establish long term relationships and solutions for all our customers and or business partners.

We acknowledged that food safety is a multifaceted concern that requires continuous efforts, collaboration, stringent regulation(s), and adherence to best practices throughout the food supply chain to protect public health and continually promote a safe and reliable food system.

Thermottraffic Ltd. is fully certified, and working towards or otherwise achieved accreditation, in respect of its overall business operations (processes and procedures) pertaining to food safety and alike. This includes, but is not limited to, ISO9001 (in progress);, AEO (in progress), BRC, and IFS. These demonstrate we are dedicated to maintaining high standards in our operations and assuring everyone concerned of our reliable and safe temperature-controlled logistics services. As part of that process, we are also a longstanding member of SEDEX (Supply Ethical Data Exchange) which is an online system that allows for an auditing process and for suppliers to maintain data on ethical and responsible practices, whilst equally enabling the sharing of information with its customers.

Further, we have a fully auditable HACCP, TACCP, VACCP and Quality Systems in place that identifies any points in the process that needs actions or monitoring to ensure (food) safety of the products and our operations. All staff are trained against the in-depth policies and procedures prior to conducting any tasks to ensure compliance and excellence.

4. Our Supply Chains

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

The supply chains involved in the overall sourcing, production, packaging, storage and transportation of produce (of any applicable description) involves multiple levels with differing complexities and within multiple jurisdictions. We use our Tier 1 and Tier 2 direct suppliers to manage the risks of modern slavery throughout the supply chain and clearly communicate the expectations and requirements we have.

Our key Tier 1 and Tier 2 supply chains comprise of:

- i. A network of established customers and suppliers
- ii. Temporary staff from employment agencies governed by the Gangmasters (Licensing) Act 2004 and who are regulated by GLAA.

5. Our People

We are seeking to conduct a periodical review of our overall employment practices (in respect of both directly employed individuals and also those retained via third party employment agencies), since we have not currently identified any working practices that raises any such concerns that our personnel are:

- Forced to work through mental or physical threat.
- Owned or controlled through mental or physical abuse or threat of abuse.
- De-humanised, treated as a commodity or bought and sold as property; and or
- Physically constrained or whose freedom of movement is restricted.

6. Our Policies

In addition to this statement, we also have specific policies in place that underscore and underpin our ongoing commitment to ensure that there is no modern slavery or human trafficking in our supply chains or otherwise in any part of our business operations. We will periodically review and update all of our policies as appropriate.

In doing so, our Anti-slavery, Anti-Bribery & Corruption, Whistleblowing, and Anti-Tax Evasion, policies reflect (individually and collectively) our approach and ongoing commitment to acting ethically and with integrity in all our business relationships. Furthermore, it conveys our implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere (directly or indirectly) in our supply chains or indeed any part of our business.

In addition, and relevant to modern slavery, we are bound to conform with the Nichirei Group Policies (including the Supplier Code of Conduct) that is implemented and can be found on our website at: [Group Company Policies - Thermotrafic](#) The contents define the required standards that are designed to ensure safe working conditions across the procurement chain and respectful treatment of workers, as well as eco-friendly business operations. In particular, it sets out the following core principles:

1. Child labour is not used

- Children who are younger than the minimum age permitted by law in the relevant country, or who are younger than the minimum age for completing compulsory education, shall not be employed.
- Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions.

2. Employment rights

- Full time employees shall have a regular employment contract and not forced to work more than 48 hours per week. If overtime is available, then it is optional and not mandatory.
- Staff are provided with written terms and conditions of employment in the form of a contract, which details salary, holiday entitlement, absence and sick pay terms, grievance and disciplinary procedure, and notice periods.
- Pay slips detailing legal deductions from wages will be provided monthly.
- Wages are fair and comparable within the industry and above legal standards.
- We strictly prohibit any exploitative labour practices or any associated criminal conduct.
- Mandatory training has been provided to all staff that forms part of the induction process.

3. Discrimination

- Discrimination will not be tolerated under any circumstances.
- Career development opportunities shall be equally accessible to all staff members.

4. Corruption or degrading treatment shall not be tolerated:

Mandatory training has been provided to all staff, which forms part of the induction process.

5. Governance

We have a clear governance process for dealing with modern slavery and human trafficking issues in our operations and supply chains.

Assessing compliance with our modern slavery and human trafficking values (along with monitoring of the effectiveness of the controls within the business to mitigate the risks associated with compliance with laws, regulations and company policies) is undertaken by our Compliance Team who are supported by the HR and Legal and Governance function of Nichirei Holding Holland B.V. A review process is undertaken periodically and subject to an internal audit function.

6. Assessing, Managing and Mitigating Risk

We are acutely aware there may be the risk of modern slavery or human trafficking within supply chains. Accordingly, we have in place appropriate systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

As part of the overall process seeking to mitigate and eliminate any such risk we take the following key actions:

Supplier Adherence to Our Values:

We have zero tolerance to slavery and human trafficking. As part of that process, we are striving to ensure all suppliers and any other service providers follow the Nichirei Group Human Rights Policy, the Nichirei Group Supplier Code of Conduct and any other policies related to this subject. The contents therein outline our minimum expectations in various areas, and we expect all businesses involved in the supply of goods and services to do so from a position of trust, teamwork, honesty, and mutual respect.

Nevertheless, prior to any supplier being appointed, Thermottraffic Ltd. undertakes a comprehensive review of their commercial, financial and reputational standing. To ensure all those in our supply chain comply with our values we have now implemented a Supplier Due Diligence Questionnaire. The recently updated process explicitly requests our suppliers to confirm whether (or not) they are compliant with the requirements of the Act.

In addition, we equally require our suppliers to abide with all local laws relating to health and safety, and welfare, in the workplace. We also actively encourage our suppliers to manage all waste they generate in accordance with applicable environmental laws and seek to generally reduce their carbon footprint.

Contractual Controls:

We now seek to ensure that our suppliers expressly reference compliance with the Act, which contractually obliges our suppliers to ensure that any such activity or conduct is not occurring in their business. The relevant contractual clauses, therefore, also oblige them to report any adverse findings to us.

Other Controls:

- Members of the Board and management make regular visits to our operational sites.

- We conduct employee surveys which include seeking employee views on welfare matters.
- We have grievance and whistleblowing procedures. Our whistleblowing process is a confidential and independently managed service which is available to all employees, so they can raise any concerns about how the company conducts its business. Any reports made through the process are investigated fully and professionally by suitably experienced and senior members of the organisation. Every investigation includes reporting back to those who have raised concerns. To that end:
 - We have never received a report which would raise concerns of modern slavery or human trafficking in our business operations and or dealings.
 - Our HR team is alert to flags, which could signal risks relating to modern slavery and human trafficking and understand how to report or otherwise escalate issues to senior management.

7. Training & Awareness

We recognise that to be effective at preventing, and eradicating, modern slavery we need to raise and maintain awareness of this issue and the associated risks.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we will now implement periodical training, as necessary, to our staff.

We confirm that at the time of publication all colleagues have received communications which provided them with a high-level overview of what is meant by modern slavery and human trafficking, the methods by which Thermottraffic Ltd. looks to combat it and to re-iterate that our stance is of zero tolerance regarding this matter.

8. Further steps

Following a review of the effectiveness of the steps we have taken to ensure there is no Modern Slavery or Human Trafficking in our supply chains we intend to take the further steps set out below, which form part of our wider strategy on ESG matters:

- Continuing to ensure the effectiveness of the due diligence we undertake on our suppliers and (in turn) the effectiveness of our supplier's own due diligence procedures to ensure that no modern slavery is taking place further down the supply chain.
- Continuing a programme of communication and education on legal and regulatory compliance matters. This will include modern slavery and human trafficking, bribery and corruption and failure to prevent tax evasion.
- A specific anti-slavery and human trafficking policy, which is to be communicated to all staff and included in the employee handbook that will be required to confirm they have read and understood the contents.

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 31 December 2024.

This statement was approved by R.W. Haesackers, Managing Director on behalf of the Board of Directors for Thermottraffic Ltd.