

MODERN SLAVERY STATEMENT

TIP TRAILER SERVICES UK LIMITED

Modern Slavery statement for financial year 2017

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 ("Act") and sets out the steps that TIP Trailer Services UK Limited (**TIP**) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. TIP has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within our business or our supply chain.

Our business

TIP provides trailer leasing, rental, maintenance and repair and other services to transportation and logistics customers in the UK. It is part of the TIP Trailer Services group which provides similar services across 17 countries in Europe and Canada.

TIP employs approximately 375 people and operates from 16 branches around the UK and Ireland and a head office in Manchester. All employees are based at one or more of these sites. The annual turnover of TIP is around £91 million.

Our employees

TIP has a robust recruitment process and uses professional background screening companies to screen all its employees, both permanent and temporary, before offering employment. The screening includes conducting eligibility to work in the UK checks to safeguard against human trafficking or individuals being forced to work against their will. All new employees are trained on our policies, on how to report concerns and on TIP's no retaliation policy. Furthermore, TIP ensures all temporary workers are paid comparable rates to its full term employees for carrying out similar roles so that all employees are treated equally.

Our suppliers

TIP work with a large number and type of suppliers across a number of different countries ranging from large multinational companies to sole traders and from trailer manufacturers and tyre suppliers to cleaning companies. TIP conducts due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes AMLAT and credit checks, an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery, and onsite audits where feasible.

Risk assessment of TIP on supply chain

Following the introduction of the Act, we have carried out a risk assessment on the supply chain of TIP and have categorised all our suppliers as high, medium or low risk based on the perceived risk environment of the suppliers. We have categorised as high those suppliers who either work in a perceived high risk areas (e.g. clothes manufacturers, recruitment of temporary workers) or those suppliers who in turn have a wide supply chain (e.g. tyre suppliers). TIP does not have significant direct relationships with suppliers in high risk environments but does deal with suppliers who themselves have wide supply chains.

Following the said risk assessment we have:

- Updated our Supplier Integrity Guide and created our Modern Slavery policy which forms part of the Supplier Integrity Guide. (These policies apply to the whole TIP Trailer Services group and not just to the UK.) Under these policies TIP Trailer Services requires all suppliers to comply with the Act and that they :
 - Do not directly or indirectly engage in forced labour or human trafficking;
 - Do not discriminate;
 - Pay employees a fair wage in accordance with law;
 - Provide safe working conditions.
- Sent out our updated Supplier Integrity Guide to all suppliers and prioritised obtaining signed acknowledged copies from high and medium risk suppliers;
- Requested copies of their own statements on modern slavery from all high and medium risk suppliers;
- Introduced a process to provide a copy of the TIP Anti -Slavery and Human Trafficking Statement to all new suppliers at the time of engagement which they are asked to acknowledge;
- Ensured suitable contractual provisions are included when creating new supplier contracts including the right to audit the supplier and termination provisions where the Act is breached;
- Conducted telephone training on the risks of Modern Slavery to all TIP Trailer Services employees (not just UK) training in particular employees to recognise red flags and who to report these to.

For those suppliers we have categorised as high risk we will continue to closely engage through senior management relationships and supplier visits to understand their supply chain practices and policies, closely monitoring for red flags.

When we identify problems with the practices of our suppliers we will take appropriate action. This action could be working more closely with the relevant supplier to help solve relevant issues, providing training using TIP resources, conducting site visits, sending an independent auditor, or removing the supplier from our approved supplier database.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. We also operate an ombuds system and actively encourage employees to report breaches of these policies and integrity concerns. These include:

1. Modern Slavery policy.

[Link to Modern Slavery policy]

2. Supplier Policy

[Link to Supplier Policy]

3. Fair Employment Policy and Recruitment policy.

[Link to Fair Employment and Recruitment Policy]

4. TIP Integrity Concerns and Ombuds system.

[Link to Integrity Concerns and Ombuds system doc]

5. Code of conduct.

[Link to Code of conduct]

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We discover no red flags in our due diligence checks around new and existing suppliers.

None of our suppliers are featured in campaigns or articles from pressure groups and publications. We will actively monitor our industry press for these and for any examples of any modern slavery practises being identified within the road transport industry.



Michael Furnival

Managing Director TIP Trailer Services UK Limited