



**MODERN SLAVERY STATEMENT
TIP TRAILER SERVICES UK LIMITED AND SUBSIDIARIES
(INCLUDING GRAYRENTALS LIMITED AND WILLIAMS TANKER SERVICES LIMITED)**

Modern Slavery statement for financial year 2019

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. 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 390 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.

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 Non-Retaliation Commitment. 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 works 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 an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and onsite audits where feasible. In addition, Anti-Money Laundering/ Counter-



Terrorism Financing (“AML/CTF”) and credit checks are carried out in order to ensure TIP will conduct business only with reputable suppliers who are involved in legitimate business activities and whose funds are derived from legitimate sources.

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 identified high risk suppliers. We have categorised as high those suppliers who either work in a perceived high risk sector (e.g. clothes manufacturers, recruitment of temporary workers), suppliers who in turn have a wide supply chain (e.g. tyre suppliers) or suppliers that are located outside the EU or Canada. TIP does not have significant direct relationships with suppliers in high risk environments but does deal with suppliers who themselves have wide supply chains.

Procedures relating to high risk suppliers

High risk suppliers are not allowed entry into our supply chain before we receive the following:

- A Trade Register or certification documenting the Ultimate Beneficial Ownership (UBO) of the supplier to ensure the owners are not subject to sanctions
- A Trade Register or certification documenting the Ultimate Beneficial Ownership (UBO) of the financial institution where TIP will transfer or receive funds to ensure the owners of the financial institution are not subject to sanctions
- Approval of the Risk Director or Compliance Leader recording that the supplier and the financial institution are not subject to sanctions

Following the said risk assessment we have:

- Updated our Business Partner Code of Conduct and created our Anti-Slavery and Human Trafficking Policy which forms part of the Business Partner Code of Conduct (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 Business Partner Code of Conduct to all suppliers and prioritised obtaining signed acknowledged copies from high risk suppliers;
- Requested copies of their own statements on modern slavery from all high risk suppliers
- Introduced a process to provide a copy of the TIP Modern Slavery 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;



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.

Training

Training on our Anti-Slavery and Human Trafficking Policy and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all TIP Trailer Services employees (not just UK). Regular training will be provided as necessary. This includes a detailed online course for employees who frequently deal with AML/CTF issues, a brief overview in TIP's annual ethics training, and as needed WebEx training on the risks of modern slavery aimed at recognising red flags and who to report these to.

Red flags

It should be considered a red flag if a person working for a supplier:

- Appears to suffer from physical or psychological abuse. He/she might appear malnourished, unkempt or withdrawn
- Seems isolated or under the control of other. Possible signs include rarely interacting with colleagues or inability to travel alone
- Lives in poor conditions
- Owns very few personal possessions. For example, he/she might always wear the same clothes to work. Lack of ID/travel documents might consequently restrict this person's freedom of movement.
- Seems frightened or hesitant to talk to strangers and law enforcement in particular.
- Travels to work at unusual times i.e. very early in the morning or late at night

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:

- Anti-Slavery and Human Trafficking Policy

<https://www.tipeurope.com/files/2019001/raw/b3c6373bf059f47c187cfdbc19de6811.pdf>

- Business Partner Code of Conduct ("Supplier Guide")

<https://www.tipeurope.com/files/2019001/raw/b3c6373bf059f47c187cfdbc19de6811.pdf>



- Respectful Workplace Conduct Policy (f.k.a.: Fair Employment Policy)

<https://www.tipeurope.com/files/2019001/raw/c3d7ecbd82169c41817fcca6c7ed5799.pdf>

- TIP Integrity Concerns and Ombudsman system

<https://www.tipeurope.com/files/2019001/raw/0f279b8588068d72f793817af4d60ee9.pdf>

- Code of Conduct

<https://www.tipeurope.com/files/2019001/raw/aa8a69c3594eca52d46b89ad21bcc241.pdf>

Our performance indicators

In order to ensure the risk of modern slavery and/or human trafficking is effectively mitigated within our business or supply chain, we will continuously monitor 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.

Approved by the Board of Directors of TIP Trailer Services UK Ltd. on 01/05/2019

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