

Modern Slavery Transparency Statement

Relating to the period from 1 January 2021 to 31 December 2021



1. Introduction

This is the sixth statement published in accordance with Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and sets out the steps taken by Associated British Ports (**ABP**) during 2021 to ensure that no slavery, forced labour or human trafficking is taking place in ABP's supply chain or in any part of ABP's business.

This statement has been approved by the Board of ABP and has been signed by the Chief Executive Officer of ABP.

ABP's previous statements can be found via the following link: (<https://www.abports.co.uk/marine-information-and-compliance/modern-slavery-statement/>).

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

ABP does not tolerate or condone abuse of human rights within any part of ABP's supply chain or business and will take seriously any allegations that human rights are not being properly respected. ABP also continues to reinforce its commitment to operating in an ethical manner and with integrity.

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2.

ABP's Business & Supply Chain

ABP is the UK's leading ports operator. As the main operating company within the overall ABP group of companies, ABP employs over 2,000 individuals across the UK and facilities within its Statutory Harbour Authority jurisdictions handle approximately a quarter of the country's seaborne trade.

The principal activities of ABP comprise the ownership, operation and development of port facilities and provision of related services to ship and cargo owners and users of seaports in the UK.

Together with its customers, ABP supports c.119,000 jobs around Britain and contributes approximately c. £7.5 billion of gross value to the UK economy every year. Delivering jobs and driving growth are key to ABP fulfilling its core purpose of "Keeping Britain Trading". ABP is also an essential partner for the Offshore Wind industry, providing Operations and Maintenance for over 50% of the sector's activity, as well as investing in infrastructure to realise future renewable energy generation.

ABP's current supply chain is extensive with a significant number of suppliers providing a broad range of goods, services and works to ABP.

ABP's supply chain can broadly be broken down into the following procurement categories:

Infrastructure Projects: development, design and engineering services, project management, construction delivery, cost, and commercial services (e.g. quantity surveying support);

Port Specific Equipment: plant and equipment for lifting materials, moving materials, moving people and marine equipment.

Maintenance, Repair and Overhaul: services, spares and tools relating to maintaining, repairing, and overhauling ABP's assets.

Utilities: supply of electricity, gas and water, removal of waste, fuels, renewable energy generation, metering, and related consultancy.

Facilities Management & Property: facilities management, property, technical and legal services, and minor works.

Business Support Services: quayside contractors and stevedores, business consultancy, IT, HR, finance, marketing & communications and compliance related services.





3.

Modern Slavery Risk Within ABP's Business & Supply Chain

As ABP's business operations are generally carried out in the UK, the risk of modern slavery taking place in ABP's business is relatively low compared to other organisations which carry out activities in jurisdictions which are considered higher risk.

However, it is a known issue that ports can be used as an entry route into the country for human trafficking. It is also a known issue that crews on vessels from other jurisdictions using a port can sometimes be forced to work in sub-standard conditions and that also human trafficking may occur through ports. ABP works closely with the relevant authorities and stakeholders in relation to these issues. ABP's Anti-Slavery and Human Trafficking Policy includes guidance for ABP employees about what to do if they have any concerns about these issues. During the course of 2022, we will be focusing on increasing the awareness of our front line workers on how to spot and report potential red flags in relation to any human trafficking through our ports.

In respect of ABP's supply chain, there are certain areas which have been identified as giving rise to a potentially greater risk of modern slavery occurring and therefore warrant further focus. These include:

Construction: ABP is constantly developing its port facilities, and this typically involves contractors carrying out development activities on ABP's behalf, including in relation to significant infrastructure projects. Modern slavery is an issue for the UK construction industry due to the risk of vulnerable workers being exploited. In addition, the procurement of raw materials used in construction may be sourced from higher risk jurisdictions.

PPE: Although ABP procures its PPE from a UK supplier, parts of the PPE are manufactured in higher risk jurisdictions.

Port Equipment: ABP procures some of its significant port equipment (such as cranes) from outside of the UK and parts of the equipment may be manufactured in high-risk jurisdictions.

Facilities Services: ABP procures significant cleaning and security services across the group and such services are generally provided via agencies.

Stevedoring Services: ABP procures significant stevedoring and other quayside services across its various ports with some of these services being provided via agencies or similar providers of contingent labour services.



4.

ABP's Approach to Procurement & Transparency in Supply Chains

Through ABP's supplier selection and onboarding process, ABP asks for confirmation from its suppliers that they employ robust procedures for ensuring that slavery, forced labour and human trafficking are eliminated from their supply chain. ABP also has a Supplier Code of Conduct which sets out a clear set of ethical principles which ABP requires its suppliers to comply with.

Some other key points to note include:

- ABP use an online Supplier Portal to manage the registration, sourcing and selection of suppliers, and other supplier data verification processes;
- ABP's HR Services function has been brought back in-house, which assists in simplifying ABP's supply chain; and
- in 2021, we implemented a business ethics compliance "check in". As part of this new process, ABP wrote to a selection of suppliers asking them to declare any non-compliance or issues in regard to certain matters (including in relation to any modern slavery issues in connection with their supply of goods or services to ABP). No issues were flagged as a result of this exercise. We will be carrying this out on an annual basis.



5. Policies & Contractual Controls

ABP seeks to continually promote a business culture and behaviours that are in line with its company values. These values are core to how we do business and set out what our customers and colleagues should expect to see. The behaviours that underpin each value are embedded in our business and reflect ABP's commitment to ensuring that everyone is treated fairly and consistently, thereby engendering a workplace that is open, honest, inclusive, and collaborative. We strive to maintain a business environment in which individuals, customers and suppliers are encouraged to speak up when they see that our high standards are not being met. Our policies and procedures relating to modern slavery are in line with our culture and values.

ABP has a number of internal policies which underpin ABP's commitment to ensuring no slavery, forced labour or human trafficking takes part in ABP's supply chain or in any part of ABP's business. These include:

- the ABP Anti-Slavery & Human Trafficking Policy, which demonstrates ABP's commitment to the issues of modern slavery and forced labour and ensures that there is focus within the business on this issue. This Policy is reviewed and updated (as appropriate) on an annual basis
- a Whistleblowing Policy which provides a way for employees or any other person to anonymously report any wrongdoings including any concerns that they may have. All reports are fully investigated;
- an Employee General Code of Conduct which set out clear expectations of how ABP expects its employees to conduct business on its behalf;
- ABP's Supplier Code of Conduct and procurement procedures as referred to above; and
- specific modern slavery contractual provisions in ABP's standard form of contracts so that our suppliers and business partners know what is expected of them.

Although the risk of modern slavery taking place within ABP's business is much lower than through some areas of our supply chain, our recruitment procedures incorporate several steps that are designed to eliminate any such risks. These include:

- carrying out "right to work" checks on day one of employment to confirm



an employee's eligibility to work in the UK.

- using a system of “preferred suppliers” for agencies supplying temporary workers to ABP. Part of the selection procedure for the preferred suppliers was an assessment of the checks that the agencies employ to assess right to work status of their temporary workers;
- carrying out pre-employment checks to verify the identity of prospective employees and to ensure that such employees are aged over 16;
- ensuring that an employment contract is in place with each employee prior to the commencement of their employment at ABP; and
- ensuring that the bank accounts to which salaries are paid match the name of the relevant employee.

ABP continues to aim to reduce the number of contractors within our workforce, allowing ABP to exercise greater control over recruitment and on boarding processes. ABP also maintains healthy relationships with its trade union partners. Matters such as ABP's terms and conditions of employment, learning and development and business change and strategy are often discussed at these meetings.



6. Awareness

We recognise that the risk of modern slavery is ongoing and during 2021 the ABP Legal Team provided specific training to areas of the business to raise awareness of the Modern Slavery Act 2015 and the requirements as set out in ABP’s Anti-Slavery & Human Trafficking Policy. The training included information on how to spot potential red flags, and the appropriate reporting procedures. We also ensure ongoing awareness of the risks of modern slavery in connection with ABP’s business through periodic updates in our internal communications.

This year ABP will continue with building awareness, by including the creation of visual reminders and toolbox talks, with a particular focus on spotting and reporting potential red flags in relation to human trafficking through our ports.

7. Review of ABP’s Progress

ABP is committed to improving its practices to combat slavery and human trafficking. We have continued to work to increase awareness of modern slavery across the business and will continue to focus on this during the course of 2022.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ABP’s slavery and human trafficking statement for the financial year ended 31 December 2021. This statement has been approved by ABP’s board of directors.

Signed by 

Chief Executive Officer on behalf of
Associated British Ports

