

Modern Slavery Transparency Statement

Relating to the period from 1 January 2024 to 31 December 2024



1. Introduction

This is the ninth 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 2024 to ensure that no slavery, forced labour or human trafficking is taking place in ABP's supply chain or in any part of its 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 ABP group of companies, ABP employs over 2390 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 the provision of related services to ship and cargo owners and the users of seaports in the UK.

Together with its customers, ABP supports c.200,000 jobs around Britain and contributes approximately c. £15 billion to the UK economy every year, handling £157 billion of trade. Delivering jobs and driving growth are key to ABP fulfilling its core purpose of "Keeping Britain Trading" and "Enabling the Energy Transition". We are redefining what Keeping Britain Trading means in the greener, cleaner economy of the future. This is reflected in our sustainability strategy, Ready for Tomorrow, which sets out our plan to reach net zero greenhouse gas emissions from our own operations by 2040 and enable the UK's energy transition.

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.



Openness & Honesty



Making A Difference



Exceeding Expectations



Teamwork & Respect



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. ABP is also aware of similar issues within the fishing sector where vessels and operators can be registered and operate from the UK. 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.

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. 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 as a whole due to the risk of vulnerable workers being exploited. In addition, 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 may be 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, resulting in ABP having less visibility of the workforce and terms of employment used.

Stevedoring Services: ABP procures significant stevedoring and other quayside services across its ports. Some of these services are provided via agencies or similar providers of contingent labour services, again resulting in ABP having less visibility of the workforce and terms of employment used.



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.

Some other key points to note include:

- ABP uses an online Supplier Portal to manage the registration, sourcing and selection of suppliers, and other supplier data verification processes.
- We carry out an annual business ethics compliance "check in". As part of this process, ABP writes 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). Any potential issues or red flags are followed up.
- In response to the potential risk posed by ABP's procurement of PPE that may be partly manufactured in high-risk jurisdiction, we are increasingly choosing to procure products from companies that hold an SA8000 certification, which demonstrates that the supplier takes steps to focus on employees' rights and wellbeing, offering them a safe place to work and good working conditions.



5. Policies & Contractual Controls

ABP is committed to conducting all aspects of its business in an honest, ethical and safe manner and to maintaining the highest possible standard of integrity in all our business dealings. ABP is also committed 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 consistent with this.

ABP has a number of internal policies that underpin its 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:

- ABP's 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 these issues. 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 raise concerns or provide information that they believe shows wrongdoings. All reports are appropriately investigated;
- an Employee General Code of Conduct which set out clear expectations of how ABP expects its employees to conduct business on its behalf; and,
- specific modern slavery contractual provisions in ABP's standard forms of contract 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 is an assessment of the checks that the agencies employ to assess the “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 the recruitment and onboarding processes. ABP maintains healthy relationships with its trade union partners and holds meetings with them on a regular basis. 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

ABP recognises that the risk of modern slavery and human trafficking is ongoing and raises awareness within the business of such risks in various ways, including:

- published awareness communications via internal newsletters;
- posters displayed in prominent places around the ABP sites;
- tool box talks delivered to front line employees setting out red flags to look out for at the ports;
- raising awareness of modern slavery and human trafficking in team meetings;
- ABP's Anti-Slavery and Human Trafficking Policy which includes guidance on what to do if employees have any concerns;
- training on modern slavery and human trafficking for employees;
- clear communication channels for employees to report any concerns which they may have in respect of modern slavery and human trafficking;
- involvement with the Merchant Navy Welfare Board and meeting regularly with Port Welfare Officers from the various seafarer missions who visit vessels and raise anything of concern taking place onboard with ABP; and
- briefing pilots on warning signs to look out for when onboard visiting vessels.

This year ABP will continue to build awareness of modern slavery and human trafficking, including through training, internal communications and visual reminders.

7.

Review of ABP's Progress

ABP is committed to improving its practices to combat slavery and human trafficking. During 2024, we continued to ensure that awareness and the ability to report acts of modern slavery and human trafficking remained a priority, and our associated policies and contractual controls remained appropriate and relevant.

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 2024. This statement has been approved by ABP's board of directors.

Signed by



Chief Executive Officer on behalf of
Associated British Ports