

## Blue Circle Express Ltd – Modern Slavery Policy 2019

Modern slavery and human trafficking are both crimes and violations of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Blue Circle Express Ltd are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

Blue Circle Express Ltd are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process we have undertaken a review of our supply chain to identify and assess potential risk areas and maintain a register detailing the same.

We expect high standards from all of our subcontractors, suppliers and other business partners and have made this a contractual term in all of our agreements with significant suppliers wherever possible.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and Blue Circle Express Ltd may amend it at any time.

The management of the Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it, they are responsible for the day-to-day implementation of this policy and will regularly review the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery and human trafficking.

Our zero-tolerance approach to modern slavery and human trafficking is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

