



# ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

2022/2023

**ASENDIA**

BY LA POSTE & SWISS POST



# OUR SEVENTH ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

***'Slavery is an umbrella term for activities involved when one person obtains or holds another person in compelled service. Modern slavery is an issue that happens everywhere and affects us all – from the clothes we wear, to consumer electronics, to the food and drink we consume. Slavery is not just something that's happening beyond our borders. It is happening right here in the UK, too.'***<sup>1</sup>

Logistics plays an important role in keeping supply chains moving across every sector and therefore industry players in this sector must be extra vigilant to identify and prevent any instances of modern slavery.

This is the seventh annual Modern Slavery Statement to be published by Asendia UK Limited, for the year 31st May 2022 to 30th May 2023.

## **Introduction**

***'Mobile phones. Clothes. Shoes. Flowers. Wine. Food. Many of the products we buy and use every day are produced by people trapped in modern slavery. Every day, millions are exploited to fulfil our relentless drive for cheap products.'***<sup>2</sup>

There is an estimated 40.3 million people in modern slavery, including 24.9 million people who are thought to be trapped in forced labour worldwide. It is estimated of this figure that 16 million people are exploited in the private sector which is linked to supply chains of international businesses who supply our goods and services.

Slavery exists in all stages of the supply chain, from the picking of the raw materials through to the manufacturing of goods such as garments, finally to shipping and delivery to consumers.

Most products pass through a long chain of producers, manufacturers, distributors and retailers before they get to you. It can be very difficult to track a product's component back to a particular producer, for example cotton in a t-shirt back to a particular cotton farm.

These long and complex supply chains make it difficult to oversee of who is working where and under what conditions, and the relentless drive for lower prices increases the human cost.

***'Almost 20% of the world's global cotton production is linked to China's forced labour meaning almost every high-street garment company could be implicated.'***<sup>3</sup>

## **Asendia UK's business and supply chains**

Asendia provides e-commerce parcel solutions for e-tailers selling internationally. We help growing businesses to achieve international e-commerce success by providing managed logistics solutions which overcome the challenges of global expansion.

Our network delivers to over 200 countries and territories. We are located in 4 continents and deliver parcels and mail worldwide.

Asendia UK's 'direct supply chain' consists of our valued e-commerce retailer clients from around the world, and our trusted business partners: collection, sortation and freight forwarding partners in the UK, and also customs clearance and delivery partners in several international jurisdictions.

## **Our Goal and Vision**

Our vision is to deliver on our promise to make cross-border e-commerce and mail easy and reliable, worldwide. That means we make it easy for our customers to get their mail, publications and packages out to their customers, wherever they are in the world. We support e-commerce operations with efficient and dependable delivery and returns services. Whether it is a large number of items or a young business starting out and growing, we provide easy-to-use services that can be relied upon, so they can focus is on developing their business.

<sup>1</sup> Unseenuk.org

<sup>2</sup> Antislavery.org

<sup>3</sup> Antislavery.org



## Synopsis by Simon Batt, CEO

As we move into 2022 we are learning to live with COVID-19 and recognise this may be with us for some time. We were in a fortunate position that e-commerce saw an increase in online shopping as people stayed home and shopped online. As a direct result we were able to recruit throughout 2021 to accommodate this growth in business but this in turn put more pressure on us to ensure due diligence when recruiting and selecting candidates. All businesses therefore need to be mindful of the issues that the pandemic has exacerbated, such as low pay, insecure work and inequality.

The war in the Ukraine has brought further pressure with regards due diligence. The rise in human trafficking in conflict and post-conflict situations has been well documented in Eastern Europe, as well in more recent conflicts such as those occurring in Iraq and Syria. The current crisis in the Ukraine has led to an increase in the number of people susceptible to human trafficking.

As the business grows we are working with more suppliers and partners, therefore further expanding our supply chain. We acknowledge that you cannot eradicate slavery from the supply chain overnight. We acknowledge that investigating the supply chain takes resources and time – sometimes years – to get to the bottom of a problem and achieve sustained improvements for workers among all relevant suppliers. We need to maintain focus and ensure that follow-up action is taken with urgency. Decreasing visibility and/or lack of leverage within deeper tiers of supply chains means there is less ability to influence supplier practices. In conjunction with the largely hidden nature of modern slavery it is key that we collaborate with others to address issues systemically.

We are committed to understanding our supply chain, being transparent about what we find, and then working to help eradicate modern slavery. We recognise that as a company with a global presence, we can also work with others to tackle modern slavery by pushing for positive changes for workers. Eliminating human suffering is not something that can be done on a piece of paper. Awareness of modern slavery alone will do little to help exploited people. This is an issue that requires constant, proactive attention.

To combat the risks of modern slavery and human trafficking in our own business and in our supply chains, we have taken (and continue

to take) steps that we are proud to share with you in this statement; therefore I present our 2022 Modern Slavery Statement, our 7th statement to date, which outlines how we have built up previous foundations to increase the scope and impact of our modern slavery work.

### Risk Assessment

We take a broad approach to combat modern slavery within our business and our supply chain. To understand risks, actively support human rights and remedy any issues we identify.



### Our Key Challenges

As a logistics company shipping parcels around the world, we work with a lot of businesses and partners who entrust us with the shipping of their parcels to their valued customers. All our partners in turn have their own individual supply chain and associated risks. We recognise that modern slavery risks are higher in our supply chains than in our own operations. Our key challenge lies in the risks of our partners supply chains and trusting that they are doing the appropriate due diligence in their supply chains - identifying modern slavery risks and how they would address issues, should they find any. We have therefore continued to focus our attention on third party agencies that supply our temporary workers as we deem this to be our highest risk area. To address this risk, we work closely with a selection of external recruitment agencies to recruit our temporary and permanent staff.

All our agency providers are asked to provide us with their Modern Slavery policy and statements and to advise us of their processes to ensure that their workers are not trafficked or victims of modern slavery. This year we rolled out a more in-depth audit of a sample of these agencies to ensure compliance to prevent the risk of modern slavery as well as ensuring they comply with other legislative requirements such as Health and Safety and the Right to Work in the UK.

### Our Approach

We therefore want to work with suppliers who share our values, who understand the salient risks, and will address any human rights violations should they find them.

The relationships with the majority of our partners and clients have been established over a number of years and are built upon trust, respect and mutual values. We have close and personal links and keep in regular contact with the owners, directors and senior managers of each partner and client business we work with, to ensure our business and ethical values are aligned. As a global business we use carriers from around the world to deliver our customers parcels, where steps to eradicate Modern Slavery are not as advanced – therefore posing a potential risk to our business. To address this we tend to use suppliers who already have a connection with a part of our global group of companies, so a trusted relationship has already been formed.

We adopt several approaches to prevent, identify and address all forms of modern slavery:

- Implementing policies and processes that clarify good practice and unacceptable practices
- Conduct employer training
- Communicate to our employees and business partners, to raise widespread awareness of risks and highlight how as a business, we can be a force for good in identifying hidden issues and speaking up to ensure these are investigated and dealt with in the right way



## Due Diligence

At Asendia UK we take a strong stance in undertaking due diligence and addressing any human rights risks that appear within our supply chain. Asendia UK continues to conduct appropriate supply chain due diligence which includes assessing common symptoms of modern slavery risks.

Internally, we have appointed a dedicated HR representative to the warehouse, who is aware of the signs of modern slavery, who walks the floor on a regular basis, building relationships with the workers, therefore engendering a workplace of trust and respect. Our supervisors are trained to monitor, record and report where workers' appearance may show signs of injury or malnourishment. Our supervisors and managers are also encouraged to talk informally to workers to understand whether they are experiencing issues.

Our supplier contracts contain clauses related to modern slavery and human trafficking and our due diligence processes. As well as complying with all applicable modern slavery laws, we require our suppliers to assess the risk of these practices within their business and to take reasonable steps to ensure they don't exist in their own supply chain, striving to achieve the best practice possible in line with UK standards. We now require our suppliers to complete our supplier due diligence questionnaire before we contract business.

### *Being a responsible employer*

To ensure that we recruit and treat employees fairly, eliminating modern slavery at all costs, we recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates.



We employ around 400 permanent staff across 3 sites in the UK in a variety of professions including warehouse workers, operations, human resources, IT, legal, finance. We also employ agency workers during peak season.

We aim to employ a workforce that reflects, at all levels, the diversity of society as a whole.

Our recruitment process incorporates checks to ensure that we adhere to employment age and right to work laws. Proof of eligibility to work in the UK is verified during the recruitment process before any offer of employment. We provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, break times, holiday entitlements and benefits.

Employees are not contractually required to work more than a 40 hour week, and overtime will only be worked on an optional basis.

We value everyone's contribution equally and are committed to providing a healthy and safe working environment. We will not tolerate any discriminatory behaviour or attitudes in the workplace and in dealings with our customers, agents, suppliers or anyone we come into contact with during the working day. We are committed to respecting, protecting and championing the human rights of all who come into contact with our operations, including employees, supply chain workers, customers and local communities.

### **Listening to our people**

We seek feedback from employees throughout the year and more formally through our annual people survey which is open to all Asendia employees globally. The results from this survey helps our leaders and HR teams to identify behaviours and practices that could lead to a failure of ethics, controls or governance before they occur. This confidential feedback also allows for potential instances of exploitation in any form to be raised and investigated.

### **Policies and Practices**

We have several policies in place that help us to enforce the standards set to prevent the risk of modern slavery in our supply chains and to also encourage disclosure of any such practices within

our business and throughout our supply chains. Some of our employment policies including the Anti Modern Slavery policy and our Employee "Code of Conduct and Business Ethics" policy forms part of our employee induction process. Employees also have their own individual training sessions on induction to the business, to ensure that all employees understand the seriousness of the subject and how it can impact our business and supply chain. Employees must confirm that they are committed to and will participate in further training on these policies. These policies are available to all staff via our HR software too, and also within our Employee Handbook.

All employees must behave in a way that reflects our ethical principles of honesty and integrity. Disciplinary measures may be taken against any employee who violates our policies.

### *Our Anti-Slavery & Human Trafficking Policy*

This policy clearly defines Asendia's position on Modern Slavery and sets the minimum standards that we expect all of our suppliers to comply with, to ensure the fair treatment and well-being of all workers in our supply chains.

### *Our Whistleblowing Policy*

This policy encourages our employees and anyone within our supply chains to report concerns of illegal or unethical malpractice within our business or supply chains, and ensures their protection for speaking up. The anonymity of whistleblowers and anyone raising concerns or bringing to our attention practices that do not comply with our policies, is protected.



The policy outlines how an individual can access a confidential 'Speak Out' hotline (available in nine languages, 24 hours a day) to report any concerns about behaviour or practices within our organisation, including breaches of company policy.

*Our "Code of Conduct and Business Ethics" policy*

This policy incorporates our stance on the following ethical subjects: Anti-competition, Anti-bribery and corruption, Gifts and Hospitality, Anti-money laundering, Data protection and IT security, Procurement, the Environment, Anti-modern slavery, Human rights, Equal opportunities, Bullying and harassment.

Breaches of these policies are not taken lightly. Where there is opportunity to influence change, we will work hard with our suppliers to do so.

**Training and Raising Awareness**

Asendia engage a number of agency staff at our warehouse units and we understand the associated risks. Therefore all of our staff must have a clear understanding of the risks of modern slavery to our business and especially within our workforce. We train all teams within the business in order to educate them about the risks and to be able to recognise the indicators of modern slavery. Equipped with this knowledge, our staff are more likely to identify possible warning signs related to modern slavery and they can raise issues, if they have any suspicions that any of our agency workers are trafficked or victims of modern slavery. Our staff can also recognise if any of our suppliers appear not to be meeting our expected standards.

We also send regular modern slavery communications out to all staff, in order to continue to raise awareness of the issue. Our Anti-slavery and Human trafficking policy and our Modern Slavery statements are published on our website for staff, suppliers, customers and anyone with an interest to read about the risks to our business and the steps we are taking to combat modern slavery.

**Future steps for 2022 – 2023**

Asendia UK understands that it has an ongoing responsibility to continue to assess and mitigate the risk of modern slavery for the long term. Going forward into our next financial year 2022-2023, we hope to continue to combat modern slavery in the following ways:

- We have many supply chains that contribute to the operation of our business. Asendia UK continues to grow in size and our supply chains do so too. We have released our Supplier Compliance Questionnaire, the purpose of which is to survey, open a dialogue and to gather information from our supply chain, that will help us to identify positive practices within our supply chains and to focus on what support might be needed amongst it. This questionnaire will be sent out on supplier set up as we begin working with new partners and thereafter annually for all suppliers to complete. We hope that the additional information that we gather from responses to our questionnaire will enable us to benchmark suppliers and practices in order to ensure that modern slavery is a key focus when selecting potential business partners.
- Maintain a declaration of commitment from our suppliers.
- Maintain a declaration of commitment at Board level, to eradicate slavery from our supply chains and to work collaboratively with others to address those issues that we cannot resolve alone.
- Continue to raise awareness of the risks of modern slavery and human trafficking within our business and our direct supply chain.
- Continue to request further information on the business practices of our current and future direct supply chain clients and partners and as travel permits attend supplier sites in person to observe operations and discuss business practices with the senior management of each of our partners face to face.
- Measure and benchmark our performance against the action steps identified in this statement, best practice amongst similar commercial organisations and emerging case law in this area and to identify further areas of improvement to add to our annual compliance risk management process.
- Continue to conduct appropriate supply chain due diligence which includes assessing common symptoms of modern slavery risks.
- Maintain regular and engaging staff training.

To date we have not been made aware of, or discovered any instances of human trafficking or slavery within our own business or within our direct supply chain. However, as a business, we are committed to continually strive to ensure that any mistreatment of individuals is identified and eradicated at each touch point of our business and direct supply chain.

This Statement is made in accordance with the Modern Slavery Act 2015 section 54(1) and constitutes Asendia UK's Slavery and Human Trafficking Statement for the year 31st May 2022 to 30th May 2023 and will be reviewed annually.



Simon Batt - CEO, Asendia UK Limited  
Date: 31st May 2022

