Modern Slavery Statement

Introduction

This statement sets out PPF Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2024 to 31 March 2025. (note change to financial year reporting, resulting in a 15 month period)

As part of the recruitment and logistics sectors the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of PPF Ltd.

- PPF Ltd operates under two trading names.
    - ADR Network is involved in the supply of HGV drivers to major retailers and 3PL's (3rd party logistics companies). This brand focuses on Lead Vendor services whereby we manage the entire agency labour requirement at the depot and our client has one point of contact for ordering and invoicing.
    - TW Network supplies warehouse operatives within its 'industrial' arm of the division. Again, the brand focuses on Lead Vendor services where we act as the main agent for a client with one point of contact.

Countries of operation and supply

The organisation currently operates in the following countries:

- UK only.

The following is the process (and steps taken by the company) by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

High-risk activities

- The business has determined that all activity within our supply chain is low risk. We meet face to face with all Suppliers providing driving services and go through a thorough approval process before placing any individual on assignments. All agency staff that we directly engage with are subject to a vigorous registration process. Only those individuals that we meet face to face are presented for assignments. High risk activities will be reviewed annually along with the entire policy.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** All policies are reviewed annually by the HR Director and Managing Director. External advice is sought where appropriate, and the Directors responsible are committed to keeping updated with current and pending legislation changes.

- **Training:** Operational Directors meet with the Board Directors every quarter to discuss and implement any new training requirements. The business runs one communications days each year with its entire staff. These events are held for training and business updates. Any subsequent training requirements are dealt with in groups of no more than 10 on a case by case basis. Email is used to update the company with any relevant bulletins. This is then loaded to the company intranet where all updated policies exist.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Modern Slavery and Human Trafficking Policy** The policy outlines the company stance in relation to Modern Slavery and the responsibilities it expects from everyone working for the business to uphold the policy.

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our 3rd party whilstleblowing by following this link https://adrnetwork.integrityline.com/.

- **Code of business conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the uk and abroad and managing its supply chain.

- **Supplier Agreements** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's Supplier Agreement will lead to the termination of the business relationship. Suppliers providing driving services to PPF Group Ltd are required to undergo an on-line audit and work to the conditions set out in our 2nd tier supplier agreement. Following a successful supplier setup, an annual desk audit then takes place.

Preventative measures – PPF Ltd has fully implemented a new front office system with strong compliance protocols built into the system. This further strengthens our compliance to the Modern Slavery act and minimises risk. For example, our system cannot pay a temp less than the National Minimum Wage, and if bank details appear twice anywhere on our system, a Director is made aware so an investigation can take place. Further strengthening of our procedures took place in 2022 with the use of an accredited ID Service Provider. All proof of right to work checks are now either undertaken with YOTI or direct with the Home Office where a share code is made available.

Board Director approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Director's signature:

Date: 4 March 2025