SIG / TRANSPORT

Modern Slavery & Human Trafficking Policy

Responsible transport, fair work and prevention of exploitation

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SIG Transport Ltd does not tolerate slavery, servitude, forced or compulsory labour, child exploitation or human trafficking in its operations or supply chain. This document is a company policy, not a retrospective claim of historic compliance or an annual statutory transparency statement.

1. Purpose and coverage

This policy sets out the standards and practical steps SIG Transport Ltd (SIG) adopts to identify, prevent and respond to modern slavery and human trafficking risks. It covers SIG personnel and, as relevant to their engagement, independent subcontracted hauliers, couriers, drivers, recruitment intermediaries, storage providers and other suppliers used to deliver transport or logistics services.

2. Our operations and risk areas

SIG arranges and performs road transport, courier and related logistics services. Some work, particularly larger HGV movements, is carried out by independent transport providers. Potential risk factors include layered subcontracting, labour recruitment through intermediaries, insecure immigration or employment status, wage deductions, excessive driving or working hours, and cross-border movements.

3. Non-negotiable standards

- Work must be freely chosen. No person may be coerced through threats, debt bondage, restricted movement, withheld wages or confiscated identity documents.
- Child labour, trafficking and exploitative recruitment practices are prohibited. Any young worker must be lawfully engaged and protected from hazardous work.
- Workers must receive their lawful pay, rest and working protections according to their actual employment status; recruitment fees or deposits must not be imposed unlawfully.
- Everyone must be treated with dignity, without intimidation, violence, harassment or unlawful discrimination.
- Concerns can be reported without retaliation. The safety of potentially affected people takes priority over commercial convenience.

4. Leadership and responsibilities

The Director is accountable for adoption, supplier expectations, escalation of serious concerns and periodic review. Anyone arranging transport, engaging a supplier or supervising work is expected to be alert to warning signs and to refer credible concerns promptly. Suppliers remain responsible for their own workers and legal duties.

5. Supplier prevention and proportional due diligence

From adoption, SIG will seek basic identity, lawful operating status and appropriate insurance evidence for new subcontractors, and communicate this policy and the Supplier Code of Conduct. Risk-based additional enquiries may be made where work involves high-value cargo, unfamiliar supply chains, international activity, agency labour or other relevant indicators. Existing suppliers will be reviewed progressively as relationships renew or material concerns arise.

Verification checks are not a guarantee that exploitation cannot occur. SIG will record material concerns, seek suitable clarification, and may pause allocation or end a relationship where necessary and legally permitted.

6. Warning signs and reporting

Warning signs may include a worker appearing fearful of a supervisor, being unable to access personal documents, unexplained wage deductions, a recruitment debt, unsafe accommodation tied to work, inconsistent accounts of who employs or pays a driver, or evidence of coercion.

Raise concerns confidentially with the Director via info@sigtransport.co.uk. Include factual details where safe; do not investigate or confront suspected exploiters yourself. If someone is in immediate danger in the UK, contact emergency services on 999. SIG will handle personal information carefully, consider safeguarding and seek appropriate professional or authority assistance.

7. Responding and improving

A credible report will be reviewed promptly, with an appropriate record of the concern, initial safeguarding action, any request for supplier explanation and the outcome. Serious cases may require suspension of work, external advice or reporting to the appropriate authorities. SIG will not knowingly retaliate against someone who raises a concern in good faith.

8. Communication, monitoring and review

This policy will be made available to relevant colleagues and suppliers. The Director will review it at least once a year, and may introduce proportionate supplier questionnaires, refresher guidance and stronger controls as the business develops. No claim is made that historic independent supplier audits or formal training programmes have been completed.

9. Legal and reporting context

The Modern Slavery Act 2015 applies alongside relevant employment, immigration and criminal law. The annual transparency statement obligation in section 54 generally applies to qualifying organisations with at least £36 million in annual turnover. This policy is voluntary governance documentation and is not presented as a section 54 annual statement.

Guidance: www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide; www.legislation.gov.uk/ukpga/2015/30/section/54

Document ownership and review

Policy owner: Gergo Szemok, Director, SIG Transport Ltd. This is the first published edition, dated 11 November 2026. It is subject to operational adoption and implementation. Review at least annually, or sooner following material changes in law, business operations or identified risks.