

Bibby Line Group – Modern Slavery Statement

1. Introduction

Bibby Line Group is a diverse and forward-looking family business delivering personal, responsive and flexible customer solutions for over 200 years.

Bibby Line Group is a £1.2 billion business, operating in more than 20 countries, employing over 4,500 people in industries including retail, offshore, financial services, distribution, shipping, marine based businesses and plant hire.

Bibby Line Group operates with strong corporate values:

- Work together
- Be better
- Trust each other
- Be innovative
- Do the right thing

Bibby Line Group upholds high levels of corporate governance and corporate social responsibility. We are committed to operating within the law, with ethical business practices, and being responsible to the communities in which we operate.

We strongly support the eradication of slavery, as well as the eradication of servitude, forced or compulsory labour and human trafficking.

2. Scope and structure

This statement covers Bibby Line Group head office and our qualifying subsidiaries. We operate substantially autonomous operating subsidiaries each responsible for their own strategy, results and operations.

Each qualifying subsidiary is responsible for its own statement in relation to Modern Slavery – please review the individual statements.

<http://www.bibbydist.co.uk/pdf/bibby-distribution-anti-slavery-statement.pdf>

<https://www.bibbyfinancialservices.com/footer/modern-slavery-act>

<http://www.bibbyoffshore.com/about-us/ethical-behaviour.aspx>

<http://www.costcuttersupermarketsgroup.com/wp-content/uploads/Modern-Slavery-Statement-2017.pdf>

3. Bibby Line Group supply chains

Group head office employs less than 50 people and procures products and services including facilities management, maintenance and cleaning, office equipment and supplies, utilities, communications and IT software/hardware, recruitment, management consultancy, legal and audit services.

The qualifying subsidiaries procure a wide range of services and products to meet their business needs and these are listed within their individual statements.

4. Policies in relation to slavery and human trafficking

All our suppliers are expected to comply with all national and local, relevant law and regulations.

Where we become aware of any organisation that has been or is found to be knowingly involved in modern slavery we will cease to trade with that organisation.

Other relevant BLG policies and procedures:

- BLG Procurement Policy;
- BLG Equal Opportunities policy - as part of the recruitment process we will require all prospective employees to produce appropriate ID (originals must be produced) to demonstrate that individual's legal right to live and work in the UK before employment is allowed to commence;
- Bullying & Harassment policy, which outlines our policy in respect of any oppressive behaviour within or in relation to the workplace;
- Whistleblowing Policy, which outlines the steps that may be taken by individuals within or outside the company, in relation to any concerns an individual may have about their own treatment or about the practice of employees, managers or the company. This policy is currently being strengthened with the addition of an independent international service provider to support whistle-blowers in raising their concerns;
- Anti-Bribery & Corruption policy, which governs how we ensure we do not undertake unethical, illegal and immoral behaviours; though not specifically designed to deal with modern slavery, it does cover all forms of corruption and general business ethics.

In addition, our qualifying subsidiaries each have their own policies and procedures in relation to Modern Slavery – please review the individual statements.

5. Due diligence, risk management and KPIs in relation to slavery and human trafficking

The potential risks of an inadvertent breach of the principles espoused in this statement are managed through our corporate risk framework, based on the “3 levels of defence” approach.

Bibby Line Group requires its qualifying subsidiaries to comply with the Modern Slavery Act, and therefore subsidiary statements are reviewed by their relevant subsidiary Board and signed off by a director.

Although policies were not finalised throughout 2016, any incidents or breaches of the Act should have been notified to the respective Boards through the risk management process. We have no recorded incidents of our own, or suppliers', breaching of the Act in 2016.

The level and extent of due diligence carried out varied across the qualifying subsidiaries, and is detailed in their individual statements.

The Group head office approach to due diligence and appropriate KPIs in this area is being considered and will be implemented during 2017.

There has been specialist training for key staff in subsidiaries, particularly in roles with some responsibility for modern slavery and human trafficking, and the roll-out of training for wider staff groups will take place in 2017.

6. Next steps

In 2017 the Group will monitor best practice in this area as it develops and seek to implement relevant training, processes and procedures where appropriate. This will include procurement policies, employment policies, due diligence, staff training and risk management, as well as the modern slavery policy and statements themselves.

7. Validation

This statement is made in relation to the UK Modern Slavery Act 2015, Section 54 and constitutes Bibby Line Group Limited and its subsidiaries' slavery and human trafficking transparency statement for the financial year ending 31st December 2016.

Reviewed by the Board of Directors on 23 May 2017.

Signed

A handwritten signature in black ink, appearing to read 'M. Bibby', with a long horizontal flourish extending to the right.

Sir Michael Bibby, Bt
Managing Director
Bibby Line Group