

Introduction

The UK Modern Slavery Act 2015 requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. Connect Group PLC ("Connect Group") is fully committed to preventing acts of modern slavery and human trafficking from occurring within each business within the Group and their respective supply chains, and seeks to impose those same high standards on its suppliers. We take a zero-tolerance approach to non-ethical practices and we are committed to acting professionally, fairly and with integrity in all our business dealings and supply chain relationships, wherever we operate, implementing and enforcing effective systems to uphold ethical standards and to combat modern slavery and human trafficking.

Connect Group's Role in the Supply Chain

Connect Group is a leading specialist distributor operating in complex and fragmented markets, primarily in the United Kingdom but with increasing prominence internationally. The Group's networks are focused on serving high drop density early morning deliveries, and the demands of irregular parcels and freight.

The Group's core businesses are each leading players in their markets:

Smiths News

Smiths News is the UK's largest newspaper and magazine wholesaling business with an approximate 55 per cent. market share. It distributes newspapers and magazines on behalf of the major national and regional publishers, delivering to approximately 27,000 customers across England and Wales on a daily basis. The speed of turnaround in the UK and density of Smiths News' coverage is critical to one of the world's fastest physical supply chains.

Dawson Media Direct supplies newspapers, magazines and inflight entertainment technology and content to over 80 airlines in 50 countries. Delivering to strict time windows with security accreditation, DMD serves the specialist needs of airlines and travel points in the UK and worldwide with printed and digital media.

Tuffnells

Tuffnells is a leading distributor of irregular parcels and freight, serving approximately 5,000 small and medium sized enterprises across the UK. Its network of 37 depots collects and delivers parcel freight consignments, specialising in items of irregular dimension and weight ("IDW"), examples of which include bulky items, building materials and automotive parts. With a mix of local and national clients, Tuffnells completes up to 70,000 daily deliveries, offering a range of timed services that are responsive to customer demand.

Connect Group employs over 5,000 people worldwide and has business operations in 10 countries, principally through its international media business, Dawson Media Direct Limited.

Connect Group has a global annual turnover of c£1.5bn. To find out more about the nature of our business, please see www.connectgroupplc.com.

Policies

As part of our commitment to combating modern slavery, we have the following policies within our organisation:

- Ethical Trading Policy;
- Procurement Policy and Supplier Code;
- Dignity at Work Policy;
- Code of Business Conduct;
- Right to Work Recruitment Guide;
- Anti-Bribery Policy;
- Anti-Fraud Policy;
- Whistleblowing Policy; and
- Agency Workers Regulations Policy.

We also make sure that our suppliers are aware of our key policies and Code of Business Conduct through our website “supplier zone”, and encourage them to adhere to the same high standards. These policies have been developed and adopted by Connect Group in order to ensure that we conduct all business in an honest and ethical manner.

Risk and Compliance

At an operational level, the nature and extent of the Group’s exposure to the risk of modern slavery occurring in our supply chains is carried out by means of regular and on-going risk assessments conducted by our employee relations team, our procurement team and sub-contractor management team as well as our senior management, Executive Leadership Team and Board.

Given the nature of the Group’s services (principally providing distribution and logistics services in the United Kingdom to its customers and suppliers, rather than as a stock-holding company with large volumes of inventory originating overseas), we do not consider that the Group operates in high risk sectors or locations. That said, we remain alive to the potential risk of modern slavery arising in our distribution businesses and in our broader supply chain for services to the Group. Accordingly, before we commence dealing with (i) a new supplier, we will conduct a risk-based assessment and may then audit their practices, policies and procedures using our standard modern slavery due diligence questionnaire, with an increasing focus on the suppliers’ ethical trading standards and (ii) with a delivery contractor or employee, we will seek to apply best practice and look to audit their right to work in the United Kingdom, ensuring that such labour is not forced and ensure that pay is made direct to the recipient’s own bank account.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have established the following procedures and

protocols in order to combat any modern slavery risk and have sought to put in place measures as appropriate to reduce this risk and provide adequate protection for whistle-blowers:

- where we source products and/or services from overseas we will periodically undertake supplier audits, whether conducted internally or through external agencies, together with checking supplier references with external third parties;
- we seek to ensure that all our suppliers adhere to our ethical standards and anti-slavery policies and provide a copy of our Ethical Trading Policy to each supplier – for instance, our standard terms of purchase, available via our supplier zone and on all of our purchase orders, cross refer to our Ethical Trading Policy requirements;
- we expect to introduce contractual protections in our dealings with certain suppliers to reinforce our ethical standards and anti-slavery policies;
- we enforce a strict code of compliance and do not tolerate slavery or human trafficking within our supply chains – if we find evidence of a failure to comply with our policies we will terminate our relationship with the relevant supplier; and
- in particular, we have reviewed, amongst others, our relationships with both recruitment agencies for the supply of permanent and temporary resource and our relationships with independent service providers (ISPs) who provide composite delivery services across the Group and we will continue to look to audit the capability of these agencies and the ISPs against our key policies and Code of Business Conduct, together with checking references, in order to combat any modern slavery risk and promote compliance with an individual's right to work in the relevant jurisdiction.

Training

As part of our annual policy compliance training module, we look to educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through such education programmes and ad hoc monitoring of suppliers, employees are encouraged to identify and report any potential breaches of this anti-slavery and human trafficking policy (or any other Group policy).

We are pleased that our employees understand the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Developments in Tackling Modern Slavery

In the last financial year, we have further increased our efforts on tackling modern slavery and human trafficking, strengthening our work in the areas which pose the greatest risk:

- in line with the implementation of a group-wide people system, we have automated our employee on-boarding processes, thereby minimising manual intervention, enabling improved management information and automating follow-up reviews for 'right to work' checks for our workers;

- we have invested in and strengthened our contractor management team, allowing us to standardise our contractor on-boarding process across both of our businesses as well as allowing us to more closely monitor
- we have built upon capacity within our Connect Source procurement system, to allow us to more closely monitor our suppliers and conduct additional due diligence where required; and
- we have raised awareness of anti-slavery and human trafficking issues through a group-wide re-launch of our updated Modern Slavery policy and manager guidelines.

Concluding Remarks

This statement has been approved by the Connect Group PLC Board of Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Connect Group's modern slavery and human trafficking statement for the 2019 financial year (1 Sept. 2018 – 31 Aug. 2019).

Gary Kennedy
Chairman

August 2019