

## **Bibby Line Group – Modern Slavery Statement**

**Approved by the Bibby Line Group Board 28th June 2022**

### **Opening statement from Bibby Line Group**

Bibby Line Group is a family owned international business that is committed to acting responsibly.

We support the eradication of all forms of slavery, servitude, forced or compulsory labour and human trafficking.

We are unequivocally committed to operating within the law, adhering to our corporate values and policies, which promote ethical business practices, and being responsible to the communities in which we operate.

We have a zero tolerance of modern slavery, servitude and forced or compulsory labour and human trafficking. We also require the same high standards from our contractors, suppliers and other business partners, which include new suppliers of products and services in relation to the Covid-19 pandemic.

As a result, each of our subsidiaries publish a Modern Slavery Statement, regardless of whether they are required to do so by law. Bibby Line Group Head Office and its subsidiaries had no reported incidents in relation to modern slavery or human trafficking in 2021.

### **Overview and purpose of the organisation**

Bibby Line Group is a diverse and forward-looking family business delivering personal, responsive and flexible customer solutions for over 210 years.

Our purpose is 'To grow the long-term value of the Group'. Guided by our shared values, we are custodians of the family business for future generations, creating a diverse Group of innovative companies that develop colleagues, delight customers and give back to communities.

As part of the group's 'Compass' Sustainability programme, Bibby Line Group works towards its vision of "A family business, known for creating a better future together".

Bibby Line Group operates with strong corporate values below and it upholds high levels of corporate governance and corporate social responsibility:

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

During 2021, the Group was a circa £260million revenue business, operating in multiple countries and employing approximately 1,300 people in financial services, marine, and infrastructure support industries. In February 2021 we completed the sale of our retail business Costcutter Supermarkets Group to Bestway Wholesale and as a result Costcutter does not feature in this Modern Slavery Statement.

## Scope and structure

This statement covers Bibby Line Group Head Office (which includes Bibby Line Group Limited & Bibby Holdings Limited) and provides links to our subsidiary statements. We operate substantially autonomous operating subsidiaries, with each business responsible for its own strategy, results and operations.

Each subsidiary is responsible for its own Modern Slavery Statement which includes details of action taken by each company and next steps:

- [Bibby Financial Services Ltd \(and its subsidiaries\)](#)
- [Garic Ltd](#)
- [Bibby Marine Ltd \(and its subsidiaries\)](#)

## Bibby Line Group supply chains

Group Head Office employs around 20 people and procures products and services including facilities management, maintenance and cleaning, office equipment and supplies, utilities, communications, recruitment, management consultancy, legal and audit services.

## Supply Chain Risk and Assurance

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery within our business and supply chains. Our supply chains are limited, and we procure goods and services from a restricted range of UK suppliers.

BLG will continue to obtain assurance that the Modern Slavery Act is being complied with through its risk and audit work.

## 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;
- Recruitment Right to Work Checks;
- Bullying & Harassment policy;
- Whistleblowing Policy;
- Anti-Bribery & Corruption policy.

Our subsidiaries procure a wide range of services and products to meet their business needs and have their own policies and procedures in relation to modern slavery - these are listed within their individual statements.

## Due diligence

The potential risks of an inadvertent breach of the principles covered in this statement are managed through BLG's Risk Management Framework, and BLG operates a 'three lines of defence' approach to risk management.

Bibby Line Group requires all its subsidiaries to comply with the Modern Slavery Act 2015, and therefore subsidiary statements are reviewed by their relevant subsidiary Board and signed off by a director. The level and extent of due diligence carried out is as appropriate to the subsidiaries and is detailed in their individual statements.

Any incidents or breaches of the Act would be notified to the respective Boards through the risk management process.

As part of our commitment to monitor and reduce the risk of slavery and human trafficking from within our organisation and from those businesses with which we interact, we have adopted the following due diligence procedures:

- We work closely with our supply chains and expect those organisations to ensure compliance and adherence to legislative obligations and to have suitable anti-slavery and human trafficking policies and processes in place.
- We seek to build long standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them.
- We have in place systems to encourage the reporting of concerns and the protection of whistle-blowers.
- We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.
- We will terminate agreements where suitable anti-slavery arrangements are not in place.
- We maintain and monitor an anti-bribery and corruption register from quarterly employee data. This is approved by the Board on an annual basis.
- We expect an appropriate level of due diligence to be carried out by the subsidiaries and require them to detail it in their individual statements.

### **Modern Slavery Statement Registry Service**

Bibby Line Group and its subsidiaries subscribe to this government service (currently non-mandatory), enabling consumers, investors, NGOs and others to search for statements and scrutinise the action organisations are taking to eradicate modern slavery in businesses and organisations.

### **Next steps**

Bibby Line Group will continue to monitor best practice in this area as it develops and seeks to implement any necessary changes. We will continue to invest and implement relevant training, processes and procedures where appropriate and will also continue to ensure appropriate levels of risk awareness in respect of modern slavery and human trafficking is communicated to all our colleagues.

From 2022 we will deliver annual corporate ethics and modern slavery training to all colleagues.

**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' modern slavery and human trafficking transparency statement for the financial year ending 31st December 2021.

This statement will be reviewed and updated on an annual basis.



**Jonathan Lewis**  
**Group Managing Director**