# Horizon International Holdings Limited Horizon International Cargo Limited

## Modern Slavery and Human Trafficking

Horizon International Holdings Limited (company number 05942131) is a group of international freight forwarding businesses. Horizon International Cargo Limited (02602566) is a related company by virtue of shared ultimate ownership and two directors in common. The respective Boards of Horizon International Holdings and Horizon International Cargo have decided to have a common policy related to modern slavery and human trafficking. Accordingly this statement is applicable to both businesses and for convenience where appropriate in the following text "Horizon" "we" and "our" is used to refer to both businesses.

References to the Act mean the Modern Slavery Act 2015.

We totally and willingly acknowledge that we have a responsibility in conducting our business to minimise any risk of modern slavery or human trafficking occurring either within our own businesses or within our supply chain.

This statement is effective 31 March 2019 and particularly relates to planned actions during the next 12 months. Progress will be reported annually by means of an updated statement.

The respective Boards are responsible for ensuring the terms of this statement are implemented and monitored within our businesses, including where appropriate allocation of resources for training of employees or guidance to our suppliers.

This is our first such statement and accordingly there is no report concerning actions related to the Act in the previous 12 months.

## Organisational structure and supply chains

Horizon International Holdings operates internationally through or with a number of subsidiary or associated businesses. Subsidiary businesses are based in the EU, Japan and the USA.

This scope of this 2019 statement is our business operations and suppliers with in the UK.

### Supplier adherence

We are committed to ensuring that our suppliers deal with us according to the highest ethical standards. Reciprocally this applies to our dealings with our suppliers. We have in place robust business ethics policies (including antibribery) which are integral to our employment standards.

During the next year we will be conducting a review with our suppliers to establish their commitment to the principles of the Act including practical steps they are taking to implement practices that minimise likelihood of human trafficking or modern slavery. When we have completed this review we will develop a comprehensive code of conduct specifying our requirements from suppliers. Adherence to that code will then become a term in all our commercial contracts. It should be noted that many of our suppliers are substantial corporate entities with their own well-developed policies and practices concerning human trafficking and modern slavery. Accordingly where in our view such suppliers have policies that at least match our requirements we may alternatively cross refer to these in related commercial documentation.

## Policies within our businesses

We have comprehensive guidelines for all employees concerning the standards that we expect of them in conducting our business. We are updating the existing statement on business ethics to specifically include actions an employee should take if ever suspecting human trafficking or modern slavery either within our businesses or within our supply chain.

#### Risk assessment

Our initial assessment of risk related to the Act (and related to the geographic scope of this statement) is that internal risk is low. We directly employ staff only rarely using agency workers. Our employees are professionals or skilled workers, subject to full verification of their right to work

in the UK, paid very competitively in the context of our market i.e. very significantly more than national living wage.

Concerning our supply chain, as noted above many suppliers are major businesses with well-developed policies and practices relevant to the Act. Services delivered to us by suppliers are primarily specialist or professional, without roles (involved in services to us) that are likely to be vulnerable to trafficking or slavery.

We acknowledge there is a risk of complacency. Our planned review of supplier compliance with the Act, noted above, will be conducted thoroughly.

#### Summary of planned actions

- Review of supplier compliance, development of new code, updating of commercial contracts.
- Updating employment materials to specifically raise employee awareness of the issues and obligations under the Act. It will include robust channels for reporting any concerns. There will be a communications (and if judged necessary training) programme for all employees to raise awareness.
- We will appoint a senior executive to be accountable for our programmes related to the Act; this person will report to our Boards on progress & further actions needed.

#### **BOARD APPROVAL**

This statement has been approved by the Boards of both Horizon International Holdings Limited and Horizon International Cargo Limited. It will be reviewed and updated annually. This statement is made pursuant to the section 54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the current financial year.

Signed:

By Nigel Davies director of both Horizon International Holdings and Horizon International Cargo.

Dated: 31 March 2019