



OPTIMUM DRIVING GROUP MODERN SLAVERY POLICY

This statement has been published in line with the requirements of the Modern Slavery Act 2015 and sets out the Company's position on the prevention of modern slavery and human trafficking for the year ending December 2025.

Optimum Driving Group takes the issue of modern slavery very seriously with a zero-tolerance approach to the subject and with continual review by our Operational teams. We collaborate with our clients and registered work seekers as part of our attempts to expose any incidents of modern slavery in the workplace. Our efforts have continued throughout 2024, and we are pleased to report that no incidents were identified, and none have ever occurred in the life of our business. We are in support of the Act and will not knowingly work with any businesses found to be involved in modern slavery.

Our Business

The Optimum Driving Group operates as both an Employment Agency and Business in the UK, supplying contingent and permanent recruitment workforce solutions to the Logistics sector for over 25 years. Whilst our purpose remains constant, in the world of recruitment technology has reduced traditional value. We strive to maintain person-to-person relationships with clients and workers.

We help organisations in the UK and Europe to develop and maintain their workforce to support their business demands and growth, and volume of labour fluctuations. To be able to flex up and down in workers is a priority within Logistics and we have access to a pool of compliant and ready to work candidates. Our agile approach, industry insights, expertise and experience aid us to create a workforce, providing clients and candidates with the right match at the right time.

We invest in our people. Through training and our development programme, to develop our people with the skills critical to their job.

The size of our temporary workforce fluctuates throughout the year. All the companies/organisations we supply and all the work-seekers we provide to them are met with and identified by our staff. The hiring organisations that we work with are located in the UK and Europe. The work-seekers/workers we supply have the right to live and work in the UK. The use of other agencies in the supply of our recruitment services is minimal. Limiting our supply chain and reducing risk.

Contracts with our suppliers of goods place an obligation on them to comply with the Modern Slavery Act and where appropriate also include rights of audit to help us identify unethical practices.

Our Policies

The Optimum Driving Group policies are established by our compliance team and based on advice from Peninsula HR professionals, industry best practice and legal advice. We review our policies on a regular basis, and adapting to changes as required.

As a company we have the following relevant policies in place:

Modern Slavery and Human Trafficking Policy sets out our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Ethical Purchasing Policy - stipulates the conditions under which the Company will conduct its business in respect of the procurement of all externally supplied goods and services and requires our supply chain to provide positive assurance towards, including but not limited to, zero tolerance on human trafficking and use of any form of forced or compulsory labour and freedom of employees.

Code of Business Conduct and Ethics - promotes honest and ethical conduct throughout the Company, as well as provides a mechanism to report unethical conduct to us, to help preserve our culture of honesty and accountability and is part of our annual update training undertaken by all employees.

Whistleblowing Policy - sets out our position on whistleblowing and encourages the reporting of any legal or regulatory violations or any failure to comply with internal regulations, ethical standards, and legislation.

Supply Chain Business Partner Policy - details our expectation of suppliers to adhere to our ethical and social standards including minimum labour standards.

Fair Labour Practices – worker questionnaire (completed anonymously).

Adherence to our policies is expected of all employees. Any employee who breaches our policy on Modern Slavery and Human Trafficking Policy will face disciplinary action, resulting in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they do not meet our corporate expectations.

We review our policies and procedures on a regular basis and as legislation may dictate to ensure not only ongoing compliance to our standards but also that our supply chain shares the same principles and commitment to the Modern Slavery Act.

Our Processes for Managing Risk

Our standard practices are designed to protect and promote human rights and fair labour practices throughout the recruitment, selection, and employment of both our employees and the work-seekers we place with our clients. We operate within all applicable recruitment legislation.

The Compliance team conducted remote audits of our network. These audits included establishing as an employer, we comply to the Proof of Right to Work rules governed by the Immigration, Asylum and Nationality Act 2006 legislation, undertaking of the right checks at the right time, to establish an individual's entitlement to work. This includes the completion of follow up checks for those employees who have limited permission to be in the UK to ensure we do not employ an individual who is not permitted to work, proof of history/references and qualifications (as required) for all our workers.

Our Payroll department carry out regular checks on our workers bank details to identify where individuals may be sharing bank accounts, or addresses, as this could be an indication of illegal behaviour. All workers continue to have on-line access to their weekly or monthly pay records allowing them to view all deductions we legally make from their salaries.

Due Diligence

A commitment to human rights, fair labour practices and ethical business dealings is essential to our principle-based culture.

- Ensuring all workers and work-seekers in the UK have access to free help and advice.
- Working with employers and recruitment businesses to help prevent job scams and labour market abuses.
- Bringing the voices of workers and businesses to UK Gov, to help inform labour market policy.

We seek positive assurance, within our UK supply chain, that they agree to comply with the principles of Supply Chain Business Partner Policy, which forms part of the contract with our supply chain. Where appropriate, we carry out due diligence on prospective suppliers, as well as auditing existing and prospective suppliers about legal and contractual compliance.

The Optimum Driving Group takes a risk-based approach to addressing concerns that may arise from our supply chain. Modern Slavery considerations are included as part of our risk management and supplier selection processes. We also review how we align with our suppliers on this issue. We expect all suppliers to operate in accordance with our Supply Chain Business Partner Policy. We procure that our supply chain disseminates these terms down to their own suppliers and subcontractors.

Training

Our Code of Business Conduct and Ethics provides guidance to all our staff on the conduct of our business according to the highest moral standards. The code and our other ethics policies help to focus our staff on the areas of this type of risk. It offers guidance in recognising and dealing with any ethical issues and provides mechanisms to report unethical conduct without fear of retaliation.

Additionally, where we have supply arrangements in a sector where the use of modern slavery practices is a known concern (e.g. food pickers and packers), we have introduced further training for the recruitment teams involved.

Our Performance

There have not been any breaches of the Modern Slavery Act reported during the history of our group. As to the future, we will:

- provide annual CSR training update including Modern Slavery to all our employees,
- promote the importance of human rights across our business,
- carryout internal audits of our branch network.

We are committed to ensuring there is transparency in our own business and in our approach to tackling unethical business practices, including modern slavery, throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.