



Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It outlines the steps taken by Steder Group (UK) Limited ("Steder Group") to identify, prevent, and mitigate modern slavery and human trafficking within our business operations and global supply chains.

This statement relates to the financial year ending 01/01/26 to 31/12/26 and is reviewed and updated annually.

1. Our Commitment

Modern slavery is a crime and a violation of fundamental human rights. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking—all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

In accordance with our Code of Conduct, Steder Group maintains a zero-tolerance approach to modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings, and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our approach is aligned with:

- The UK Modern Slavery Act 2015
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Labour Standards
- OECD Due Diligence Guidance for Responsible Business Conduct

2. Our Organisation, Structure, and Business

Steder Group (UK) Limited is a UK-registered private limited company operating in the global logistics and supply chain sector. Senior management and the Board of Directors provide oversight of ethical conduct, legal compliance, and risk management.

We provide a comprehensive range of logistics services, including:

- Project logistics and complex cargo movements
- Air and Sea freight forwarding (FCL and LCL)
- Road transport and intermodal solutions
- Warehousing, storage, and fulfilment services
- Customs clearance and compliance support

3. Our Supply Chains

Our supply chains involve a diverse range of partners, including transport providers, shipping lines, airlines, warehouse operators, and professional service providers.

We recognise that the global logistics sector presents inherent risks of modern slavery, particularly regarding subcontracted labour, international road transport, and operations in high-risk jurisdictions. We adopt a risk-based approach to manage these complexities.

4. Policies and Governance

Our commitment is embedded within our governance framework. Key policies include:

- Code of Conduct: Sets the ethical standard for all employees and representatives.
- Anti-Slavery and Human Trafficking Policy: Explicitly prohibits forced labour.
- Supplier Code of Conduct: Outlines the standards we require from our partners.
- Whistleblowing Policy: Provides a safe channel for reporting concerns.

We perform rigorous background checks on all employees and recruitment agencies. Every employee receives a written contract and is compensated in full compliance with local national minimum wage laws. We strictly adhere to regulations regarding working hours, rest breaks, and health and safety.

5. Due Diligence and Supplier Management

Steder Group conducts proportionate due diligence during supplier onboarding. This includes:

- Risk Assessment: Evaluating suppliers based on geography and service type.
- Verification: Requesting confirmation of compliance with human rights laws.
- Contractual Obligations: Including specific clauses that require suppliers to comply with the Modern Slavery Act.
- Ongoing Monitoring: Engaging with suppliers to address and remediate any identified risks.

6. Risk Assessment and Management

We identify and assess risk by considering the nature of the services, geographic location, and the use of temporary or migrant labour. Controls are applied proportionately, with heightened scrutiny given to high-risk logistics hubs or regions with limited labour protections.

7. Training and Awareness

To ensure a high level of understanding of the risks of modern slavery, we provide guidance to relevant employees. This training focuses on "red flags"—recognising the signs of exploitation and understanding the internal procedures for reporting suspected cases.

8. Reporting and Whistleblowing

We encourage the reporting of concerns by employees or third parties. Reports are investigated thoroughly and handled with the strictest confidentiality. Steder Group guarantees that no person will suffer retaliation or victimisation as a result of reporting a concern in good faith.

9. Continuous Improvement

We recognize that the fight against modern slavery is an ongoing process. Steder Group is committed to the continuous improvement of our policies, supplier engagement strategies, and risk monitoring as our global business activities evolve.

10. Approval

This statement was approved by the Board of Directors of Steder Group (UK) Limited and signed on its behalf.

Signed: Fraser Speirs Name: Fraser Speirs Position: Director Operations

Date: 01/01/26