

# CityFleet Networks Limited

## Policy Statement January 2019

# Slavery and Human Trafficking

COMFORT EXECUTIVE

CITY FLEET  
CITY FLEET

ComCab

westbus

CityFleet Networks Limited are committed to improving our practices to combat slavery and human trafficking.

### ORGANISATION STRUCTURE

We are a Leading Global Land Transport Company. We are part of the ComfortDelGro Corporation Limited (“ComfortDelGro”), who is our ultimate parent company head quartered in Singapore. ComfortDelGro has over 24,500 employees worldwide and operates in seven countries with a global annual turnover of S\$3,805m.

### OUR BUSINESS

This statement covers all of the activities of CityFleet Networks Limited. CityFleet Networks Limited is the parent company for taxi companies operating in major cities within the UK; Computer Cab plc, Computer Cab (Liverpool) Limited and Computer Cab (Aberdeen) Limited. The group also operates an executive private hire business branded Comfort Executive operated by Flightlink International Limited. We also operate a coach hiring service through our subsidiary Westbus Coach Services Limited.

### Our supply chains include:

Our UK business has in excess of 1,000 suppliers who provide a range of products and services including transport services, capital equipment, professional

services, facilities, maintenance repair & operating and support services totalling nearly £40 million per year in spend. Whilst all the Tier 1 suppliers are based in the UK there are a handful whose operations and Tier 2 supply chains are also performed outside the UK.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Purchasing Policy and Supplier Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The policy has been built around and adopts elements of the of Ethical Trade Initiative (ETI) Base Code as a means of evaluating suppliers and contractors who may be considered high risk in terms of modern day slavery and selected sections of the Ten principles of the United Nations Global Compact.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have established an industry based risk matrix, developed an assessment tool, mapped

our first tier supply chain, identified those suppliers who accounted for 90% of our total spend along with those identified as operating in High Risk Industries.

This process identified number of suppliers who have been or will be over the next 12 months assessed against the Procurement Policy criteria to ensure that these principles are upheld.

#### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we have in place a Compliance team, which consists from the following departments who will be responsible for developing and implementing policies, assessments and remediation with non-conforming suppliers.

The compliance team will be led by the Head of Purchasing & Contracts and the Head of Human Resources.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff with key procurement personnel undertaking an independent and certified (Chartered Institute of Purchasing) yearly assessment on Ethical Procurement.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of Supplier Assessments completed
- Number of Assessment Non Compliance Notices issued
- Number of Ethical Procurement certificates obtained in the year

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to extend the scope of the assessment to those suppliers outside the top 90% and those who are in the second tier of our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2018.



CEO

Date:

11/5/19