



# Modern Slavery Statement

Rico Logistics Limited – TVS SCS IFM

Financial Year – 2023-24





## Rico Logistics Limited – Modern Slavery Statement

Financial Year 2023-2024

### PURPOSE OF THE STATEMENT

Modern slavery is a violation of fundamental human rights such as slavery, servitude, forced and compulsory labour and human trafficking. It is a global issue that can affect any organization and its supply chains.

This Statement is made by “Rico Logistics Limited”, and its entities/subsidiaries (as identified Annexure A), (collectively hereinafter referred to as “**TVS SCS IFM**” or “**we**”) pursuant to Section 54 of the UK Modern Slavery Act 2015, for the financial year ending 31<sup>st</sup> March 2024.

We are committed to a zero-tolerance approach towards any form of modern slavery and act ethically with integrity and transparency in all business dealings. We ensure that effective systems and controls are put in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### OUR BUSINESS

TVS SCS IFM is a global integration supply chain solutions company operating across United Kingdom, and countries in Europe, North America and Asia Pacific region. Our integrated solutions offering are based around break fix, emergency repair & maintenance contracts in Telecom, IT/Hitech, EPOS and money handling equipment market sectors through a network of logistics centres including central country stock, field stock locations and pick-up and drop-off points (PUDOs).

TVS SCS IFM Group delivers a multi-faceted suite of solutions from same day courier services, to break/fix technical repair and replace solutions, to warehousing and distribution management. Specialist IT repair, refurbishment and upgrade services are also available within the IFM Group portfolio alongside a freight distribution network offering such diverse services from air & sea connectivity, part-load and full truck load, hazardous and out-of-gauge freight.

### OUR POLICIES

We comply with several internal policies to ensure that we conduct business in an ethical and transparent manner.

These policies cover purchasing and recruitment activities, and include:

**Ethical Sourcing Policy** - This policy encompasses comprehensive criteria on anti-corruption, labour rights, fair and safe working conditions and environmental compliance.

**Terms and Conditions of Purchase Policy** - These terms and conditions are used with all our suppliers in the purchase of all parts and services. They flow down our policy with regards to anti-bribery, corruption, slavery and human trafficking.

**Whistleblowing Policy** - We adhere to whistleblowing policy that ensures all our stakeholders and employees raise concerns about the treatment of colleagues or practices within our business and supply chain without fear of retaliation.

**Code of Business Conduct** - Our code of business conduct outlines our organizational values and behaviour. It also establishes the standards we expect from our suppliers. This includes adherence to practices that prohibit forced labour, ensure a discrimination-free environment, provide fair wages and benefits, and uphold ethical conduct.



**Recruitment Selection Policy** - We implement a strong recruitment policy to protect against human trafficking and forced labour. This includes verifying the eligibility to work in the United Kingdom for all employees. New hires must provide work references, proof of their right to work in the United Kingdom, and identification documents. Additionally, recruitment agencies must comply with and adhere to our policies.

**RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS**

We recognise that modern slavery and human trafficking can exist in the supply chain. We require all our suppliers to adhere to the same high standards that we adopt, with many of our suppliers also meeting their requirements and publishing their own modern slavery and human trafficking statements.

Our activities to combat modern slavery and human trafficking are risk-based and correspond to the level of risk identified; we believe that this approach is proportionate and appropriate. In the main our suppliers work in low risk.

Modern Slavery is a challenge that requires continuous efforts, and we are committed to continually improving our processes to meet Modern Slavery legislation.

**OUR INITIATIVES TOWARDS SUPPLIERS**

We operate a supplier selection policy and maintain a preferred supplier list. The risks associated with a supplier are assessed and we conduct due diligence with all suppliers before allowing them to become a preferred supplier. This due diligence may include a supplier questionnaire, an online search to ensure that a particular organization has never been convicted of offences relating to modern slavery and on-site audits of suppliers identified as “at risk” which includes a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They comply with all applicable anti-slavery and human trafficking legislation.
- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- That our UK based suppliers pay their employees at least the national minimum wage / national living wage as appropriate.
- That our international suppliers pay their employees any prevailing minimum wage applicable within their country of operations

We emphasize that we reserve the right to terminate the contract immediately if any evidence of slavery is found.

**REMEDIATION**

This table provides guidance on remedial action when cases of forced labour are identified either during an audit, risk assessment or a reported issue. This table has been adapted from the CIPS website (<https://www.cips.org>)

**Table 1: Remediation of Recruitment Practice Issue**

Circumstances	Remediation Action
Workers abducted, confined during the recruitment process or sold.	Work with law enforcement and local groups especially NGOs to provide victims a safe place to stay and link them to needed services.



<p>Workers recruited through a loan or advance and are working to pay it off.</p>	<p>If the supplier paid the loan or advance, determine whether the terms were reasonable. If not, work out reasonable terms between supplier and worker. If the loan/advance was paid by a labour recruiter, determine whether the supplier had knowledge of the arrangement. If so, work out reasonable terms between supplier, recruiter and worker. If not, require the supplier to discontinue its relationship with the recruiter. Report unscrupulous recruiters to authorities.</p>
<p>Deceptive recruitment: workers promised types of work, working conditions, contract terms, housing or living conditions, job locations, employers or wages/earnings that do not materialize.</p>	<p>If the supplier made a false promise, the supplier should provide all employees who wish to leave their full wages due and transportation home. If the false promises were made by a labour recruiter, determine whether the supplier had knowledge of the arrangement. If so, the supplier is still responsible for the above. If not, require the supplier to discontinue its relationship with the recruiter. Report unscrupulous recruiters to authorities</p>

**Table 2: Remediation of Working and Living Conditions Issues**

<p>Workers working excessive overtime beyond legal limits.</p>	<p>Ensure that the supplier pays workers back wages for all overtime hours worked. Work with the supplier to evaluate staffing policies and compensation practices, such as piece rates, that are contributing to overtime. Examine your own sourcing practices, including lead times, changes in orders, pricing and other pressures that could necessitate extreme cost-cutting measures on the part of the supplier, including excessive overtime. Ensure that all workers receive training on their rights under the law and the social compliance system.</p>
<p>Workers expected to work “on call”</p>	<p>Work with the supplier to design a more structured staffing plan that meets your code’s requirements. Ensure that all workers receive training on their rights under the law and your code of conduct.</p>
<p>Employer restricts workers’ freedom of movement or communication</p>	<p>Determine who—management, supervisors, shift leaders, etc. —are involved in restricting workers’ freedom of movement or communication and investigate these individuals’ actions. If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination. If these restrictions came from management, terminate the relationship with the supplier or provide the supplier a short window of time to end all such practices. Further investigate conditions and circumstances at the worksite that management or supervisors may be trying to conceal – including through off-site interviews with workers and other knowledgeable community members. Ensure that all workers receive training on their rights under the law and your code of conduct, including channels for grievances. Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p>



<p>Degrading living conditions</p>	<p>Ensure that the supplier fully understands your minimum standards for employee housing. Give the supplier a short window of time to remedy all living conditions. Ensure that all workers receive training on their rights under the law and your code of conduct, including housing standards. Ensure that workers who wish to leave the job are able to do so and receive their full wages due. Follow up with an unannounced investigation that includes off-site interviews with workers and other knowledgeable community members. If the living conditions have not improved, terminate the relationship with the supplier – while mitigating the impact of this on the workers.</p>
<p>Workers forced to engage in illicit activities, to work for private home/family or to take addictive drugs</p>	<p>Determine who—management, supervisors, shift leaders, etc. —are involved in restricting workers’ freedom of movement or communication and investigate these individuals’ actions. If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination. If these restrictions came from management, terminate the relationship with the supplier or provide the supplier a short window of time to end all such practices.</p> <p>Further investigate conditions and circumstances at the worksite that management or supervisors may be trying to conceal—including through off-site interviews with workers and other knowledgeable community members. Ensure that all workers receive training on their rights under the law and your code of conduct, including channels for grievances. Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p>
<p>Supplier inflates workers’ indebtedness</p>	<p>Determine the source of workers’ initial debt. If the initial debt was to the supplier, require the supplier to cancel this debt. If the initial debt was to a labour recruiter, investigate whether the supplier had knowledge of the debt arrangement. If so, require the supplier to cancel the debt. If not, require the supplier to terminate its relationship with the recruiter. Report the recruiter to authorities. With respect to the inflation of the debt, require the employer to immediately stop charging any form of interest on the debt. If debt is inflated through purchases from the employer, such as at a canteen, determine whether workers have other options. If purchases at employer owned stores are the only viable option for workers, work with the supplier to ensure that prices and terms are reasonable. Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p>
<p>Workers depend on employer for housing, food or other necessities</p>	<p>In some cases, particularly for migrant workers, provision of housing, food and other necessities by the employer may be the best option for all involved. However, the quality of the housing and foods must be examined and if it does not meet minimum standards, work with the supplier to improve quality. Follow up with an unannounced investigation that includes off-site interviews with workers and other knowledgeable community members. If the living/food conditions have not improved, terminate the relationship with the supplier.</p>



Workers have personal dependency on employer	Ensure that all workers receive training on their workplace rights under the law and your code of conduct, regardless of personal relationships.
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**Table 3: Remediation of "Impossibility of Leaving" Issues**

Workers do not feel free to resign because of benefits they have received or because employer restrictions	If a supervisor or other individual is leading workers to believe they cannot leave because the supplier has provided training or other benefits, or because of an illegal contractual requirement, require the supplier to take appropriate corrective action against this individual, from training to termination. If workers simply do not understand their rights, provide training to ensure they know when they may resign. Ensure that workers who wish to leave the job can do so and receive their full wages due.
Workers feel compelled to stay because they are due wages	Ensure that wages are being computed accurately and that all employees involved in payroll are adequately trained in wage computation. Require the supplier to pay all wages due under local law (for example, if local law requires payment biweekly, require all wages to be paid, at a minimum, through two weeks ago). Ensure that payment schedules are formalized, within legal limits and the limits of your code. Follow up with an unannounced audit. Ensure that workers who wish to leave the job can do so and receive their full wages due.
Workers work for an excessive or indefinite amount of time to repay a debt or advance from the employer or recruiter	If the supplier paid the loan or advance, determine whether the terms were reasonable. If not, work out reasonable terms between supplier and worker. If the loan/advance was paid by a labour recruiter, determine whether the supplier had knowledge of the arrangement. If so, work out reasonable terms between supplier, recruiter and worker. If not, require the supplier to discontinue its relationship with the recruiter. Report unscrupulous recruiters to authorities.

**Table 4: Remediation of Penalty or Threat Issues**

Supplier or recruiter has possession of workers' identity or travel documents / Employer restricts workers' communication	Suppliers should never confiscate or take control of workers' identity or travel documents unless it is purely for safekeeping purposes, and then only if workers are able to retrieve their documents promptly upon request. Require the supplier to return all workers' identity documents. If workers prefer that the supplier hold them for safekeeping, ensure that a policy is in place for retrieval of documents and that all workers are aware of the policy. Follow up to check on the issue through an unannounced audit.
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<p>Employer threatens to turn workers in to immigration authorities</p>	<p>In any situation of violence, penalty, intimidation or threat, determine who— management, supervisors, shift leaders, etc. —are involved in these violations. If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination. If these penalties, threats, etc., were initiated by management or if management was complicit, terminate the relationship with the supplier or provide the supplier a short window of time to end all such practices. Ensure that all workers receive training on their rights under the law and your code of conduct, including channels for grievances. Ensure that workers who wish to leave the job can do so and receive their full wages due. Follow up with unannounced audits that include off-site interviews with workers and knowledgeable community members.</p>
<p>Employer perpetrates or threatens physical or sexual violence.</p>	
<p>Employer or recruiter threatens to remove privileges like promotion potential, threatens further deterioration in working conditions or threatens to fire workers.</p>	
<p>Employer or recruiter exploits religious or cultural beliefs of workers</p>	
<p>Employer or recruiter withholds workers’ pay or assets or threatens financial penalties</p>	
<p>Employer threatens extra work for uncooperative workers</p>	
<p>Employer uses blackmail to coerce workers</p>	

**OUR PERFORMANCE INDICATORS**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**TRAINING**

To increase our awareness and understanding the risks of modern slavery and human trafficking, all other related policies and procedures in our supply chains and business, we regularly conduct training to our relevant members to understand the signs of modern slavery and on how to proceed if they suspect any wrong happening within our supply chain. We also provide training to our employees on their rights, including relating to wages, benefits and grievance redressal forums.



## CONTINUOUS IMPROVEMENT

TVS SCS IFM continually improves our staff awareness of slavery and human trafficking and update all the related policies and procedures as our understanding of the current issues evolves.

## CONCLUSION

We are dedicated to upholding human rights throughout our operations. To support this commitment, we focus on continuous improvement by engaging suppliers on issues related to slavery and human trafficking, collaborating with industry groups and external stakeholders, and benchmarking to evaluate human rights risks.

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 has been approved by the Board of Director of Rico Logistics Limited on 12<sup>th</sup> September 2024.

DocuSigned by:  
  
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**Name:** Jonathan Richard Croyden

**Designation:** Director & CEO, Rico Logistics Limited





## ANNEXURE A

S.No	Entity
1	Rico Logistics Limited
2	Eltec IT Services S.L. U
3	Triage Services Limited
4	Order Logic Limited
5	Triage Holdings Limited
6	Tri – Tec Computer Support Limited UK
7	Tri – Tec Support Limited UK
8	Ricochet Spain S.L.U Spain
9	SPC International Limited, UK
10	SPC International (Engineering) Limited, UK
11	Pitcomp 171 Limited, UK
12	SPC EBT Trustees Limited, UK
13	SPC International Inc. USA
14	SPC International s.r.o. Slovakia
15	TVS SCS Rico Italia SRL, Italy
16	Rico Logistique, France
17	Rico Logistics Pty Limited, Australia
18	SPC INT Limited, UK