DAIFUKU LOGAN LTD ("the Company")

ANTI-SLAVERY STATEMENT

FOR THE FINANCIAL YEAR 2019

INTRODUCTION

The Company values its reputation for ethical behaviour and financial probity and has a commitment to act professionally, fairly and ethically.

DAIFUKU LOGAN LTD is a member of the DAIFUKU group of companies and is therefore subject to the Daifuku commitments to ethics and sustainable development (including environmental and social responsibilities) as set out in the Daifuku corporate code of conduct and associated documents. The Company has a clear policy to ensure that slavery and human trafficking is not taking part in any of its supply chain and recognises that any such practice would reflect adversely on the Company’s image and reputation and on that of its owners.

This statement is made pursuant to s. 54 of the Modern Slavery Act 2015.

This statement sets out the steps the Company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

STATEMENT OF POLICY

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. It has a commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in its business or in its supply chains.

APPLICATION OF THIS POLICY

This Policy applies to the entire DAIFUKU LOGAN LTD organisation.

The Company is a designer, manufacturer, installer and integrator of baggage handling and screening systems to airport customers worldwide and as a consequence it has supply chains in diverse areas of the World. It also works for many large clients in the airports sector who wish to ensure compliance with the Modern Slavery Act 2015 and ethical practices among their preferred baggage handling suppliers.
The Company is therefore committed to creating and maintaining effective systems and controls to safeguard against any form of modern slavery taking place within its business or supply chain.

This Policy will be made known to customers, contractors and suppliers. The Company will encourage the application of this Policy amongst its business partners, including contractors, suppliers, agents and joint venture partners.

MEASURES TO BE TAKEN TO COMBAT SLAVERY AND HUMAN TRAFFICKING

Internal Policies

1. The Daifuku corporate code of conduct issued by its shareholder, Daifuku Co., Ltd, states that it and its subsidiary companies aim to achieve “awareness as a global company and compliance with rules and social principles” and that it does so by the implementation of “fair and transparent corporate activities in compliance with relevant laws and social principles, both foreign and domestic, while taking fully into consideration international standards and rules in a global perspective”.

2. The Company avoids dealing with contractors and suppliers known or reasonably suspected to be in breach of its anti-slavery policy requirements. It undertakes due diligence, as appropriate, in evaluating prospective contractors and suppliers to ensure that they have effective practices and policies before they are accepted as a supplier or contractor. The Company’s supplier questionnaires have been amended to ensure that this issue is raised with every supplier.

3. The Company conducts its procurement practices in a fair and transparent manner. It will continue to comply with its existing Practical Guide to Ethics when dealing with Suppliers which ensures that suppliers are dealt with fairly and transparently but also that in doing so the Company respects laws and regulations, external business practices, company values and internal procedures and that those dealing with suppliers make known and ensure compliance with the Company’s obligations as regards ethics, sustainable development and social responsibility.

4. The Company monitors contractors and suppliers as part of its regular review of relationships with them and ensures that its contracts with contractors and suppliers include policies to give the Company a right of termination in the event that they conduct themselves or their business in a manner inconsistent with this Policy. This is achieved by the inclusion in supply contracts and subcontracts of its Ethics and Sustainable Development clause which includes a provision that the subcontractor/supplier shall “refrain from utilising child labour or any form of slavery, servitude, forced or compulsory labour or other similar exploitation in compliance with the International Labour Organisation standards and the provisions of the Modern Slavery Act 2015”.

5. The Company’s Whistleblowing Policy ensures that all employees are aware that they can raise concerns with the Company or directly to its shareholder about how the
Company’s workers are being treated or practices within its business or supply chain without fear of reprisals.

6. Compliance with the aims of this policy will be assured by the Senior Management of the Company and their respective departments.

Internal Controls and Record Keeping

The Company will maintain records of its compliance with this policy and the due diligence it carries out.

Monitoring and Review

Senior management will monitor this Policy and periodically review its suitability, adequacy and effectiveness and implement improvements as appropriate.

Training

This Policy will be communicated to all employees through established internal communication channels.

Training has been developed by the Company for all of its employees to make them aware of the issues surrounding modern slavery and the provisions of the Modern Slavery Act 2015. It explains what practical steps employees can take to protect the supply chain and offers examples of good practice and practical steps to take. This training has been delivered to all Company employees and is given to any new employees joining the Company.

Raising Concerns and Seeking Guidance

Any person with concerns regarding the implementation of this Policy or possible violations of its provisions is encouraged to report those concerns to a member of the senior management of the Company or the Company Solicitor or the HR Manager. Any such report will be treated in confidence and without risk of reprisal.

The Company has in place a whistle-blowing policy which is set out in Appendix 2 of its Employee Handbook.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Directors of the Company on 26th February 2019.

[Signature]
Managing Director
DAIFUKU LOGAN LTD

Date: 25th March 2019