

UK Modern Slavery Act Transparency Statement

Covers activities undertaken from April 2023 to March 2024

Vanderlande Industries United Kingdom Ltd.

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1. INTRODUCTION

This statement is issued by Vanderlande Industries B.V. on behalf of its subsidiary, Vanderlande Industries United Kingdom Ltd. (“**Vanderlande**” or the “**Corporation**” or “**our**” or “**we**”), for the financial year commencing April 2023 and concluding March 2024 (the “**Reporting Period**”). It outlines the measures implemented to enhance the detection, prevention, and remediation of “**Modern Slavery**” within our supply chain and organisation.

2. REPORTING CONTEXT

This Report provides an overview of our robust governance processes, existing risk mitigation measures, and the progress achieved during the 2024 fiscal year in addressing the risks associated with modern slavery across our supply chain. Section 54 of the Modern Slavery Act 2015 (“**Act**”) requires Vanderlande to develop a slavery and human trafficking statement each year. This statement sets out what steps Vanderlande has taken to ensure modern slavery is not taking place in our business or supply chains. This Report is made pursuant to the Act and was approved by the Vanderlande Board of Directors (the Board) on 24 September 2024.

Vanderlande Industries B.V. and its subsidiaries are part of Vanderlande Industries Holding B.V. (“**Vanderlande Industries Holding B.V.**”), which is ultimately controlled by Toyota Industries Corporation.

3. STRUCTURE, ACTIVITIES & SUPPLY CHAINS

Vanderlande's warehousing solutions are the first choice for many of the largest global e-commerce players and retailers in food, fashion, and general merchandise across the globe. The company helps them to fulfil their promise of same-day delivery for billions of orders, with nine of the 15 largest global food retailers relying on its efficient and reliable solutions.

As a global partner for future-proof airport automation, Vanderlande's market-leading baggage handling systems and related passenger solutions can move over 4 billion pieces of baggage around the world per year. These are active in more than 600 airports, including 12 of the world's top 20. In addition, over 380 of Vanderlande's security lanes are installed at checkpoints worldwide.

Vanderlande is also a leading supplier of process automation solutions that address the challenges in the parcel market. More than 52 million parcels are sorted by its systems every day, which have been installed for the world's leading parcel handling companies.

Established in 1949, Vanderlande has more than 9,000 employees, all committed to moving its customers' businesses forward at diverse locations on every continent. With a turnover of 2.1 billion euros, it has established a worldwide reputation over the past seven decades as a global partner for future-proof logistic process automation.

Toyota Industries Corporation (TICO) acquired Vanderlande in 2017 to cement its global leading position within material handling. It aims to achieve this by increasing its presence in all integrated and automated projects, and capitalising on the synergies between the organisations and the added value they offer to the market. TICO therefore launched the Toyota Automated Logistics Group (TALG), which consists of Toyota L&F, Bastian Solutions, Vanderlande and Viastore. TALG is a global partner for integrated logistic process automation, with its group companies collaborating under the guiding principle: *for every challenge, a reliable solution.*

Vanderlande's total value for the UK FY2024 reporting period by origin country:

Country of Origin	Percentage of total (%)	Country of Origin	Percentage of total (%)
United Kingdom	65,688	Denmark	0,067
Netherlands	15,854	Sweden	0,062
Germany	14,265	Israel	0,05
Lithuania	1,709	Spain	0,034
Romania	0,954	Switzerland	0,027
Italy	0,515	United States	0,020
Slovenija	0,268	Ireland	0,0148
Malaysia	0,179	Portugal	0,014
Czechia	0,114	Thailand	0,008
Poland	0,096	Austria	0,002
New-Zealand	0,064	Australia	0,001

4. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Vanderlande Industries United Kingdom Ltd. maintains strict adherence to the core policies, standards, and procedures established by its parent company; Vanderlande Industries B.V. These guidelines are instrumental in reinforcing the Vanderlande's commitment to upholding internationally recognized human rights and fostering decent working conditions.

4.1 Supplier Code of Conduct

In the year 2022, we updated our [Supplier Code of Conduct](#). This code delineates the essential ethical standards and principles that are to be adhered to by all our strategic and preferred suppliers and provides clear guidelines and expectations for our suppliers across various critical areas, including human rights, labour practices, legal and compliance, health and safety, environmental stewardship, anti-corruption measures, ethics, and governance. This Code is a testament to our dedication towards fostering an ethical and responsible business environment and explicitly incorporates respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services:

“Vanderlande is committed to ensuring that working conditions in Vanderlande supply chain are safe, that workers are treated with respect and dignity, and that manufacturing and operations processes are environmentally responsible. By signing this Code of Conduct, the supplier commits and contributes to the same values and acts accordingly.”

4.2 Employee Code of Conduct

As an organization committed to responsibility and integrity, we uphold the highest standards of ethics in all our own business activities. Our Policy on Good Business ([Employee Code of Conduct](#)) embodies Vanderlande's ONE company philosophy, guiding our actions and decisions. Through our ONE way of working, we empower our people to make informed choices based on our established policies, procedures, and guidelines. These guidelines set out our business practices and outline the responsibilities of both the Vanderlande and our employees towards its stakeholders.

4.3 Policy Suite

Enclosed are the main Vanderlande policies that pertain to human rights and respectable working conditions. For comprehensive details, we kindly request you to refer to each policy individually:

Policy	Overview
Speak-Up Policy	The purpose of this policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of negative consequences. It also describes what you can expect from our Company if you Speak Up.
Supplier Code of Conduct	This code delineates the essential ethical standards and principles that are to be adhered to by all our strategic and preferred suppliers and provides clear guidelines and expectations for our suppliers across various critical areas.
Gifts and Hospitality Policy	Provides anti-bribery and anti-corruption rules to prevent, detect and correct bribery and corruption.
Human Rights Policy	Vanderlande’s commitment to conduct business with respect for international human right standards, particularly in accordance with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.
Data Privacy Code of Conduct	Sets out Vanderlande’s commitment to uphold the highest standards of integrity in dealing with and protecting personal information.
Third-Party Screening Policy	Sets out Vanderlande’s commitment to doing good business and the screening of our third parties.
Fair Competition Policy	This Fair Competition Policy is a more in-depth Policy on Fair Competition in addition to the Policy on Good Business and provides guidance how to identify and deal with potential competition risks or issues.

We are steadfast in our commitment to detect, mitigate, and prevent any violations of Human Rights within our business activities, operations, supply chain, and the communities where we have a presence. Our aim is to foster a culture of respect and dignity, ensuring a positive impact on society.

5. VANDERLANDE'S HUMAN RIGHTS DUE DILIGENCE PROCESSES

Within Vanderlande we are implementing a risk-based approach for our supplier due diligence process. This system is designed to identify, prevent, mitigate, and/or eliminate supplier risks including human rights and environmental-related risks and violations. In accordance with our obligations, we integrate within its risk management an annual and an ad hoc risks assessment for our own business and our (in)direct suppliers.

5.1 Regular Risk Assessment

We assess our own business and direct third parties according to geographical and industry/sector risks by making use of external- and internal data. We assess all suppliers and customers to ensure compliance with regulations and laws. To achieve this, we use FircoSoft Compliance Link, a tool provided by the LexisNexis Risk Group, a division of the RELX Group. The Firco Global Watchlist encompasses politically exposed individuals and enforcement profiles sourced from over 1,000 enforcement agencies and 35,000 media sources. This comprehensive system provides information on sanctions and fines related to human rights, security, and environmental violations.

The primary regulation lists within the Firco Global Watchlist originate from more than 45 regulators and are compiled from verified international sources. In addition to core data, they leverage supplemental information such as ownership details, SWIFT/BIC routing codes, location data, and vessel information. This approach enhances our cross-checks and enables us to identify sanctioned entities not explicitly listed on government registers like OFAC and EU.

The outcomes guides Vanderlande within its development and continuous improvement of the risk management of human rights and environment-related risks.

5.2 Ad Hoc Risk Assessment

For the ad hoc risk analyses, we use the same approach that is used for regular risk assessment. Ad hoc risk assessments may stem from internal decisions for being related to specific investments, onboarding of new suppliers and or customers, a new sourcing country, or from external events, e.g., when a conflict breaks out or a natural disaster occurs in a country where the company operates.

For indirect suppliers, risk assessment will be undertaken if Vanderlande has actual indications of a violation of a human-rights or an environment related laws or regulations (substantiated knowledge). Concrete indications are not mere opinions or rumours; rather, they include a verifiable kernel of facts. This knowledge may come from, for example, a complaints channel, media reports or reports from non-governmental organizations.

Additionally, we perform on-site audits of selected suppliers, including a review of their human rights standards and supply chain practices.

We are committed to review, update and further develop our risk assessment process in the future to further enhance the impact of our risk management framework.

6. MITIGATING RISKS: STRATEGY AGAINST MODERN SLAVERY IN SUPPLY CHAINS

We have the belief that respect for human rights and environment-related risks is not only a fundamental corporate responsibility, but also a guiding principle that permeates every facet of our operations. As we conduct business globally, we place great importance on upholding human rights and environment-related risks. This commitment extends to our valued business partners, whom we expect to share this ethical imperative.

We have developed a set of preventative measures concerning our own business area and of our direct suppliers to prevent any adverse human rights and environment-related risks. We continuously (on a yearly and on an ad hoc basis) review and update these measures.

6.1 Own area of business

Employees – we have adapted a Policy on **Good Business/Employee Code of Conduct** and we expect our employees to act in accordance with this Policy.

Employees need to complete mandatory Good Business Trainings on Ethics and Compliance topics each year, which take approximately 30-60 minutes in total to complete. Employees need to demonstrate understanding of the content by answering check questions correctly. Our Good Business Policy includes basic principles of good conduct based in our company's core values. The training courses are provided in English and in local languages as well. Last year's e-learning focused on Sustainability, Good Business Practices and Corruption prevention. New Employees must complete an introductory "Good Business" course as part of the onboarding process. This training covers our Code of Conduct and includes which communication channels are available within Vanderlande in case of ethical or environmental concerns and when and how to use these channels.

An annual refresher course on the most important rules and regulations in the field of health, safety (Safety Briefing/ Life Saving Rules) is mandatory for all employees. Additional training courses are rolled out on a case-by-case basis. In the past, these have included topics such as Cultural Awareness, High Performance Culture, Behaviors and Mindsets, Global Good Conduct, shaping a Sustainable Future, Global Business Ethics, Global Cybersecurity Basics, Data Privacy Rules, Accurate Books & Records, Information Security and more.

In addition, articles that touch on aspects of these topics are published on a regular base on our global intranet. As part of the annual anonymous satisfaction survey, every employee can evaluate the company, its strategic orientation, leadership, behavior of superiors and other aspects of the working environment, and to make constructive suggestions for improvement. The management board stands by its ongoing obligation to derive concrete improvement measures from the results of the surveys.

Every other year a Compliance risk assessment is distributed to a random 10% of the workforce. Depending on the outcomes, additional measures are being discussed in the Risk Committee, before being rolled out. This is to maintain our Good Business culture.

Procurement – We have implemented dedicated procurement strategies and purchasing practices that prevent or minimize identified risks, which takes human rights and environment-related risks into account, to those covered by the applicable supply chain due diligence obligations such as the German SCDDA, the Norwegian Transparency Act and the Australian Modern Slavery Act.

6.2 Supply chain

Suppliers – We give preference to suppliers whose policies and practices are consistent with those of Vanderlande and suppliers who have appropriate measures in place to protect against violation of human rights and environment-related risks. We conduct annual reviews to a selection of our suppliers as part of quality audits we perform.

We have a program in place which requires all our strategic and preferred suppliers to commit to our [Supplier Code of Conduct](#). This code sets out our general expectations and requirements for our suppliers. We require all Strategic and Preferred suppliers to adhere to our Supplier Code of Conduct or provide their own code of conduct for our review and approval. We may decline to make future purchases from a supplier that does not certify to the Vanderlande Supplier Code of Conduct or does not provide an acceptable version of their own Code of Conduct.

7. EVALUATING EFFECTIVENESS: VANDERLANDE'S METRICS AGAINST MODERN SLAVERY

In our commitment to ethical business practices, Vanderlande adopts a risk-based approach to assess and manage the potential risks associated with human rights and decent working conditions within its supply chain. This strategic methodology allows Vanderlande to prioritize its efforts effectively and make informed decisions.

Vanderlande conducts thorough due diligence on its suppliers. This process involves evaluating several factors, including country-specific risk indicators, supplier categories, and the nature of products or services provided by each supplier. By assessing suppliers, Vanderlande identifies potential risks related to human rights and decent working conditions. Based on the data collected, Vanderlande assigns a risk score to each supplier, which determines the level of additional due diligence required. Suppliers with higher risk scores undergo closer scrutiny. Vanderlande maintains continuous monitoring of its suppliers, conducting regular reviews to ensure compliance with ethical standards. The frequency of these reviews varies based on risk scores and other relevant factors.

8. STRENGTHENING KNOWLEDGE: ANTI-SLAVERY TRAINING PROGRAMS

In the year 2023, we have conducted a comprehensive training program on “Anti-Bribery & Corruption” that has been sent to all our employees across the globe. In our commitment to fostering a culture of integrity, we have facilitated comprehensive training program focusing on good conduct. This initiative is designed to equip our team with the knowledge and understanding of the principles of good conduct, thereby promoting a positive work environment.

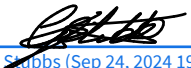
In addition, we have extended our educational efforts to the new members of the Vanderlande team. Recognizing the importance of good business practices, we have conducted specialized training sessions in this area, named the “Good Business Training”. These sessions are aimed at providing our new colleagues with the necessary insights into the standards of good business practices that Vanderlande upholds.


Our goal with these training programs is to ensure that all team members, both existing and new, are aligned with our core values and principles, thereby contributing to the overall success and reputation of our organization.

Concurrently, we are in the process of developing a more extensive training module that will encompass critical aspects of product compliance and human rights. This initiative underscores our commitment to fostering a culture of integrity and ethical conduct within our organization.

9. APROVAL AND ADOPTION

This Policy Statement has been approved and adopted by the management board on:


[Gary Stubbs \(Sep 24, 2024 19:10 GMT+2\)](#)
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