



Modern Slavery and Human Trafficking Statement

Financial Year Ending 31st December 2025

1. Statement Overview



Modern slavery and human trafficking are serious global human rights abuses that can exist in every country, industry and supply chain. The Culina Group Limited (company number – 05525931) and its subsidiaries (“Culina”, “we”, “us” and “our”) recognise that, as a business operating within complex and often international supply networks, there is risk that modern slavery could occur within our operations and those of our suppliers.

This statement sets out the steps we are taking to identify, prevent and address those risks, and reflects our firm commitment to acting responsibly, transparently and in line with the UK’s Modern Slavery Act 2015. While we acknowledge that eliminating modern slavery is an ongoing challenge, we are resolute to a programme of continuous improvement and to us using our influence to help protect the rights and dignity of our workers.



2. Company Structure, Business and Supply Chains

We are a leading third-party UK logistics business that provides an array of services to a wide range of national and international companies. Our services include, UK and EU transport solutions, warehousing and e-commerce fulfilment, pallet networking and co-packing, co-filling and co-manufacturing solutions.

This statement covers our group activities, which includes our main trading entities (with company numbers):

- Culina Logistics Limited (05128194);
- Eddie Stobart Limited (00995045);
- Great Bear Distribution Limited (02899719);
- Integrated Packing Services Limited (06963601);
- Fowler Welch Limited (01001101);
- The Pallet Network Limited (03868401);
- iForce Limited (03441816);
- CML F&L (Telford) Limited (06663387);
- Morgan McLernon Telford Limited (NI611847); and
- Warrens Warehousing and Distribution (Midlands) Limited (02765595).

We generate a global turnover more than £2.2bn through our subsidiary brands and, collectively, these businesses operate over 20 million square feet of warehousing space across the UK and operate around 3,000 modern commercial vehicles. As such, we adopt an agency and sub-contractor model that enables us to flex our workforce with the varying demands of our customers.

3. Policies and Governance

In 2025 we created a new role within the organisation, the Group Compliance Director, who is specifically targeted at overseeing the ethical trading for the whole group of Culina companies and will report directly into the Board of Directors, whether that be for concerns raised or progression against key performance indicators. They will own the modern slavery risk internally, overseeing all related policies, procedures, risk assessments and compliance.

Culina maintains the following policies that help govern this issue:

- Anti-Slavery and Human Trafficking Policy;
- Anti-Bribery Policy;
- Equality, Diversity, Inclusion and Dignity at Work Policy;
- Ethical Trading Policy;
- Grievance Policy; and
- Whistleblowing Policy.

These policies enable employees and third parties the ability to report concerns anonymously, with all concerns raised in good faith being investigated accordingly. All concerns raised are done so with the reporting individual being free from retaliation.

4. Due Diligence Process

Our current measures for monitoring and mitigating the risks of modern slavery and human trafficking include the following:issues.

- clear expectations of set out by the Board of Directors for all employees, temporary agency suppliers, sub-contractors and any other third party with whom we do business with. Set the tone from the top through a Board level communication reinforcing our zero tolerance towards modern slavery and human trafficking;
- adopting a modern slavery policy and codes of conduct for our employees and any third-party supplier that we engage and do business with. These policies and codes are regularly reviewed and enhanced as part of our commitment to continuous improvement, whether due to legislative changes or in response to key risks that have been identified;
- undertaking thorough risk assessments of new and existing supplier relationships, specifically targeted at higher risk areas such as transient agency workers;
- reviewing procurement policies and procedures to ensure that they can respond to any issues identified in risk assessments;
- ensuring all commercial contracts are vetted by our in-house legal team to ensure that all parties are under a clear obligation to comply with the relevant legislation and our policies, procedures and codes of conduct;
- ensuring that whistleblowing policies cover modern slavery reporting, and that the hotlines are easily accessible to all employees across Culina and anyone we do business with; and
- implementing a targeted training programme, including e-learning, to ensure that those responsible for procurement or managing supply chains are aware of the issues.

5. Risk Assessments and Compliance Management

We consider ourselves to operate in a low-to-medium risk sector given the level of agency staff that are operating in some of our sites.

Given the nature of our operation and its associate risk, we regularly evaluate the effectiveness of our methods and our exposure to modern slavery and human trafficking. Our risk management framework enables suitable control measures to be actioned in terms of new supplier onboarding questionnaires and regular audits for existing suppliers. The frequency of our audits is linked to the scale of risk associated with the suppliers in question. As such, we fully comply with all the relevant legislation and professional standards.

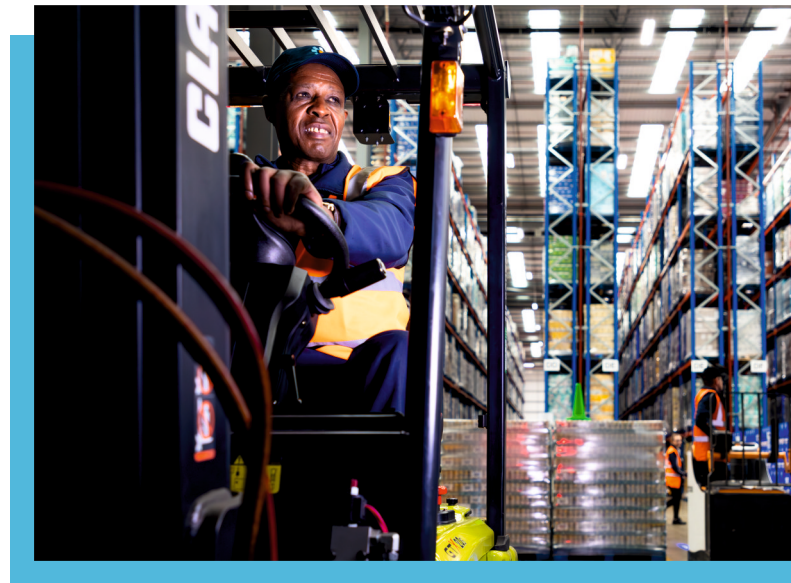
We aim to ensure all our suppliers adhere to our Anti-Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policy, we will immediately seek to terminate our relationship with the relevant supplier.



6. Effectiveness and Key Performance Indicators



Culina uses relevant management information to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. The current metrics require further work to ensure the highest of standards are achieved and that the results are an accurate reflection of our performance.



7. Training



We continue to invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our Anti-Slavery Policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

8. Future Commitments & Continuous Improvement

While we already place significant importance on this area, we remain committed to continuously improving how we operate.

Over the coming year, we will:

- continue our cross-divisional working group, developing even more effective ways to raise awareness of modern slavery and human trafficking;
- refresh our training to ensure it remains current, relevant and impactful;
- further strengthen our supplier onboarding process;
- introduce additional visual reminders for colleagues who are not desk-based; and
- challenge ourselves to uphold the highest standards of governance, striving to be best in class.



9. Approval, Signature and Publication



This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Culina slavery and human trafficking statement for the year ending December 2025.

I confirm on behalf of Culina Group Limited and its subsidiaries that this Modern Slavery and Human Trafficking Statement has been reviewed and approved by our Board of Directors. I also confirm that this statement and the supplementary policies and procedures will be made readily available to all our employees and that a copy of this statement will be published on our corporate website.

Signature:

Liam McElroy
Group CEO, Culina Group



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