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# Modern Slavery Policy

Our commitment to delivering a more sustainable  
world, free from human rights abuses

## Our Commitment

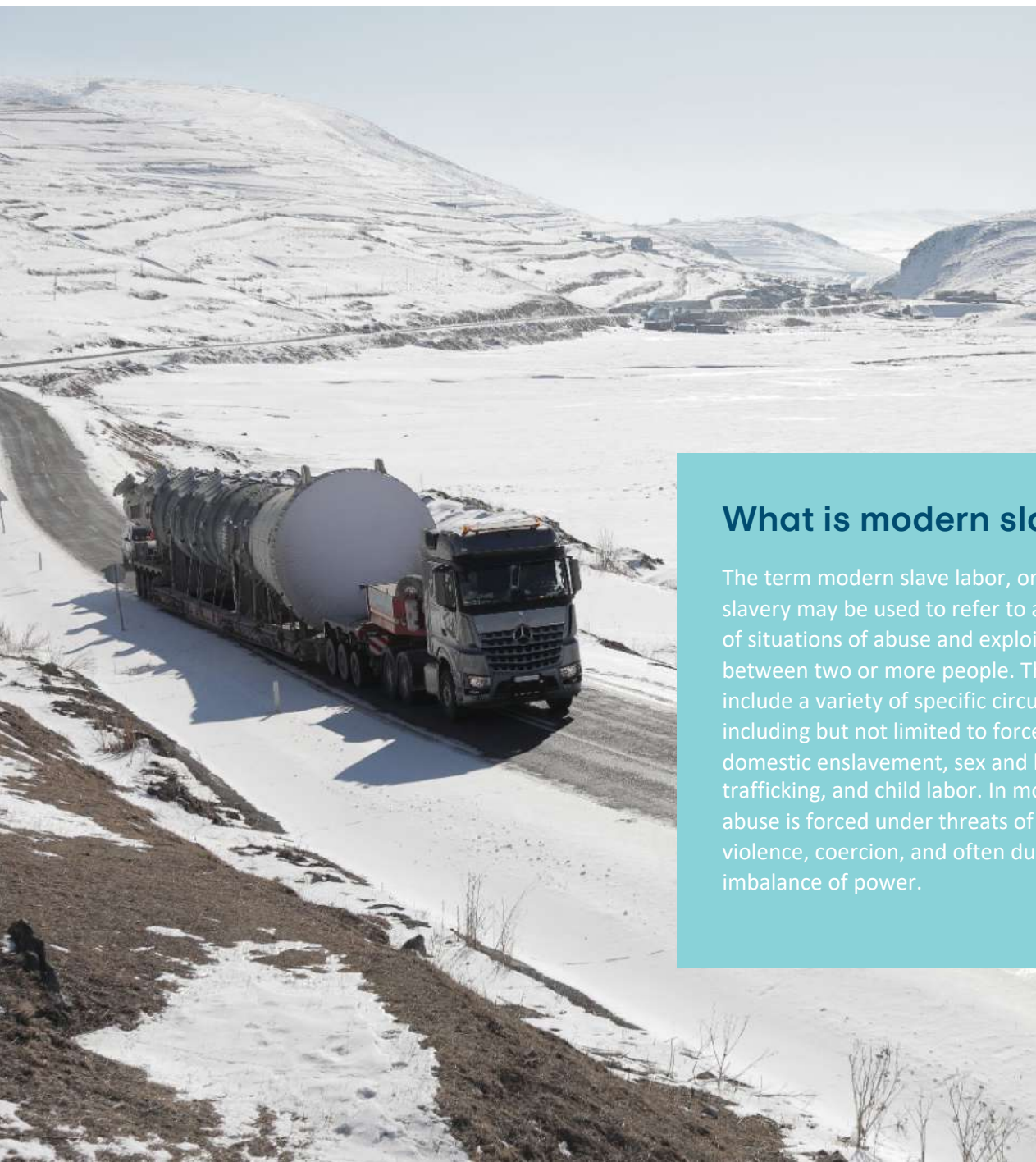
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# Our pledge to the community

As a company, we prioritize the rights of our employees and condemn any and all activity involving the mistreatment of workers. We stand strongly against human trafficking, modern slavery, and child labor, strictly holding all parties included in our daily work processes to the same standards and requirements.

Through this statement, we strongly denounce inhumane labor practices and pledge no presence of it within our business. We are dedicated to our ethical code, and vow to move forward in our business relations with actions that fall in line with those principles.

Our commitment to the highest standards of business ethics is reflected in our Code of Conduct to contributing positively to the community in which we operate and benefit from.



## What is modern slavery?

The term modern slave labor, or modern slavery may be used to refer to a wide range of situations of abuse and exploitation between two or more people. This can include a variety of specific circumstances, including but not limited to forced labor, domestic enslavement, sex and human trafficking, and child labor. In most cases, abuse is forced under threats of deceit, violence, coercion, and often due to an imbalance of power.

## General

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# Modern slavery

“Eleven Danir 19” group of companies provide sustainable logistics solutions to all industries, around the world. Our values define how we develop our business, our employees, and our service we provide to the clients and partners.

As a community builder we take a large responsibility for work environment. We take advantage of our position in the industry to make every effort to fight and prevent modern slavery in any manifestation.

Firstly, we of course start with ourselves. The developed requirements and policies are applied to the entire group of companies and to each employee. Personal example and developed procedures help us work exclusively with those companies who support and comply with our developed procedures, respect human rights, and stand in solidarity with our ethical vision.



### We take responsibility

We take responsibility for the people involved in all the aspects of workflow and services we provide. From our employees to the employees of contractors by assisting and guiding them through developed policies, modern requirements, and workflow processes.



### We educate

We always make sure that our employees and partners keep up with the modern requirements and updated policies. And we promptly instruct all involved parties on new changes, new features, and requirements. We share the knowledge gained and the materials developed with everyone we work with demanding full compliance from them.



### We supervise

All our top managers and directors are additionally trained to have a possibility to observe the compliance of the requirements, policies and developed procedures. As experts on many related issues, they make sure that all norms and requirements are observed in company daily work.



### We challenge

We have high demand on the quality of service we provide, and we expect the same to be done by our contractors, clients, and partners. We have a strong desire to grow and stay ahead of the market. We are not afraid of new goals - and always put them on the brink of the possible - to achieve the best results and stay at high level.



### We are competent

We have the skills and competence to meet the needs of customers and society. We therefore set high standards, for both ourselves and for our suppliers, contractors, clients, and partners. Through the collaboration and exchange of experience we search for innovative solutions to meet the needs.

# Modern slavery & human trafficking policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Eleven Danir 19 has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations.

We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## Responsibility for the policy

Eleven Danir 19 has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Eleven Danir 19 has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

# Policy

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## Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify our officials as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries

## Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

# Policy

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## Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

### Last Update

28/09/2021, Development department, Valds Stunza, Development Director, vs@11d19.com



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