

# UK Modern Slavery Act Statement

For Financial Year Ended 31 December 2022

Uber Boat

by **thames clippers**



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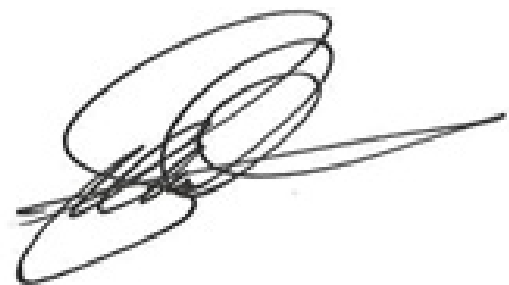


# Introduction

Uber Boat by Thames Clippers<sup>1</sup> is the fastest, most frequent and reliable river bus operator on the River Thames. The business was founded in 1999 with just one boat; since then we have grown to operate over 20 high-speed vessels, regularly serving over 20 piers in and around London. We carried over four million passengers in 2022 and our plan is to continue to grow in a sustainable and responsible way. As our business has grown significantly over the past few years, it is now appropriate for us to deliver our first formal statement in accordance with the Modern Slavery Act 2015.

Although this is our first formal statement, Uber Boat by Thames Clippers has always looked to trade fairly and ethically, source the goods and services that we use in the business responsibly, and do everything we can to prevent modern slavery throughout our business. We are proud of our history and the manner in which we look to do business, and are committed to maintaining our focus in this area as we continue to grow. Our aim is to operate sustainably and effectively, as a responsible member of the vibrant communities in which we do business, in partnership with our employees, suppliers, and other stakeholders across the broader ecosystem of the River Thames.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for our financial year ended 31 December 2022. It was approved by the board on 16 June 2023.



Sean Collins  
Chief Executive Officer  
Uber Boat by Thames Clippers

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<sup>1</sup> Uber Boat by Thames Clippers is a trading name of Collins River Enterprises Limited, a company registered in England and Wales with number 03713645 and having its registered office at 3rd Floor Clipper House, Trinity Buoy Wharf, London, England, E14 0JY







# Our business, ownership structure and supply chains

We are primarily an operator of river bus services in and around central London, and as of 24 May 2023 have 481 employees, the majority of whom are based at our offices at Trinity Buoy Wharf, London E14, as well as our dry dock facility at Tilbury. We also have smaller elements of our business that support visiting cruise ship operations (in partnership with the Port of London Authority) and intend to grow both our passenger business and our fast light freight operations in the coming years.

In April 2022, Northleaf Capital Partners acquired a majority interest in Uber Boat by Thames Clippers from AEG, the world's leading sport and live entertainment company. Northleaf's acquisition brings new investment to support our ambitious plans to deliver sustainable and responsible growth, enhanced infrastructure and greater economic development on and around the River Thames, to further support the diverse communities we serve. As our majority shareholder, Northleaf is similarly committed to responsible business and to the highest standards of ethics and environmental sustainability.

Our most significant supply chains are those related to the manufacturing and maintenance of our fleet of vessels, our food and beverage supply for our on-board café bars, the management of our premises, piers and facilities portfolio and, finally, those related to our information technology and systems providers. Each of these are discussed in more detail in this statement.



# Our policies on slavery and human trafficking

We are in the process of developing additional formal policies and procedures to underpin our commitment to ensuring there is no modern slavery or human trafficking in our supply chains, or in any part of our business. We continuously review and update all our policies, and in particular intend to further develop our Responsible Procurement Policy to require as many of our vendors and suppliers as possible to make a positive commitment to those and other similar principles as part of any new contract award or renewal post-30 June 2023. We also maintain and enforce our Anti-Bribery Policy, as we are aware that there is a risk of bribery where businesses use that as a tool to divert attention from their poor compliance in respect of modern slavery or human trafficking. Over the course of the following year, we expect to develop our internal cross-functional working group to further embed these ways of working in our early-stage procurement processes, and integrate with our supplier due diligence processes.







# Due diligence processes for slavery and human trafficking

Of our most significant supply chains noted above, we believe that those related to our food and beverage supply for our on-board café bars, and those related to the management of our premises, piers and facilities portfolio, present the most potential for modern slavery risks in our business.

As part of our initiative to identify and mitigate risk, we have ensured that our coffee is rainforest certified and have confirmed that Bidfood (who are our primary foodservice wholesale distributor) themselves have in place robust practices, policies and procedures to prevent modern slavery. As a leading foodservice wholesale distributor in the United Kingdom, we rely on Bidfood to complete the necessary risk assessment and due diligence checks as part of their supplier tender processes. We also partner with several UK-based artisanal and smaller suppliers as part of our strategy to offer a unique experience on-board for our passengers, and intend to strengthen our contractual relationships with these suppliers in the coming year. In particular, we will require all new suppliers to adhere to our newly-developed Supplier Code of Conduct by 2024, supported by appropriate supplier due diligence.

Whilst the vast majority of individuals engaged in our business are employed directly by us, we do make use of limited external agency resources to support our premises, piers and facilities operations. Those are sourced via an external agency, Dockside Personnel, and we have as part of our supplier due diligence procedures confirmed that they have in place robust practices, policies and procedures to prevent modern slavery. We are also members of Business In the Community: The Prince's Responsible Business Network, an organization committed to changing business, transforming lives and helping the planet and communities thrive.



We currently take a proportionate risk-based approach to supplier due diligence in the areas of manufacturing and maintenance of our fleet of vessels, and those related to our information technology and systems providers. That is because our new vessels are constructed in the United Kingdom and all new and existing vessel maintenance is similarly conducted in the UK, through established and responsible market-leading partners. Similarly, although several elements of the supply and maintenance of both our information technology and systems hardware and systems and software are outsourced, that is to experienced providers in the UK and Western Europe, who use highly trained and skilled colleagues to provide those, and accordingly we consider the risk of modern slavery or human trafficking in those areas to be very low.

We intend to further develop our supplier pre-engagement due diligence processes to ensure that anyone engaged through other businesses is minimum wage compliant, and also intend to seek accreditation from the Living Wage Foundation for our business in 2023. In particular, we recognize that although all our food and beverage suppliers are based in the United Kingdom, we could do more to verify that their supply chains are responsible and intend to develop our Responsible Procurement Policy to require as many of our vendors and suppliers as possible to make a positive commitment to those and other similar principles as part of any new contract award or renewal post-30 June 2023. We also intend to introduce specific contractual assurances and enhanced supplier due diligence in respect of those organizations that provide us with any agency workers.





# Supplier adherence to our values

We were pleased to secure our ISO 14001 accreditation for Environmental Management Systems in 2022, demonstrating our commitment to the environment and sustainability in our business practices. As part of that, we developed our Responsible Procurement Policy, which guides our supplier selection criteria and reaffirms our commitment to ensuring that our vendors and suppliers do not use child labour, do not use forced, bonded or compulsory labour and that our vendors' and suppliers' employees are paid a fair wage. We also require that those employees must be paid in money rather than paid in kind, and that their working hours comply with national laws and industry standards. As noted above, we intend to further develop our Responsible Procurement Policy to require as many of our vendors and suppliers as possible to make a positive commitment to those and other similar principles as part of any new contract award or renewal post-30 June 2023.





# Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we already provide training to staff in our procurement function. We intend to further develop our internal training programme as required and in light of any new and emerging issues that the business faces post-30 June 2023 and to expand the range of employees across the business that receive that training. In addition, we plan to implement a modern slavery, ethics and anti-bribery whistleblowing helpline for our colleagues and suppliers, with the expectation this will be in place by no later than 2024.

