UK Modern Slavery Act Statement – 2019
Encompassing the calendar year, 1 January 2019 through 31 December 2019

As one of the world’s leading non-asset-based supply chain management companies, CEVA is committed to respecting and valuing human rights on a global scale. Operating ethically and respecting employees, customers, and stakeholders are fundamental core values at the heart of CEVA’s corporate culture.

On October 29, 2016, the United Kingdom Modern Slavery Act (“Act”) came into effect, putting a new focus on preventing slavery and human trafficking. Pursuant to the Act’s provisions, the following statement presents the analysis and steps CEVA has taken to prevent human trafficking and modern slavery in its global business.

CEVA Policies and Supply Chain Relationships

CEVA continually strives to clearly communicate our human rights policies and expectations to our customers, third party suppliers, and agents. As a global logistics company, CEVA does not inherently produce or manufacture products, but is a service provider of choice. In providing industry-leading logistics services, it is imperative we ensure our employees, customers, and stakeholders are aware of the relevant human trafficking legislation, as well as CEVA’s internal policies that promote human rights and the fight against the proliferation of human trafficking and modern slavery.

CEVA’s established Human Rights Compliance Program (“HRCP”) is an important cornerstone of our Compliance program. It is a risk-based program, focused on goals that are designed to eliminate human trafficking and achieve compliance with CEVA’s Code of Business Conduct, the United Nations Guiding Principles on Business and Human Rights, U.S. Government regulations, and the Act.

CEVA’s HRCP clearly communicates expectations and standards in maintaining ethical business practices and the promotion of human rights to our employees, customers, and suppliers. These standards and expectations are incorporated into Compliance Covenants, which are acknowledged by many of CEVA’s suppliers and agents. Additionally, the CEVA Code of Business Conduct, which is published on the CEVA website, is illustrative of CEVA’s continued commitment to promoting an ethical corporate environment and complying with all laws, including those prohibiting human trafficking, slavery, forced labor, child labor, and unfair wages. Mutual respect and fair treatment of all is a cornerstone of CEVA’s corporate culture.

Due Diligence, Auditing, and Training

As part of its overall global compliance program, CEVA’s Compliance and Ethics (“C&E”) team routinely conducts audits and reviews, on-site and remotely, addressing several regulatory program areas. C&E has incorporated the HRCP into these compliance audits and reviews to identify and address human trafficking and forced labor risks in our global supply chain. During most site visits, CEVA compliance personnel will review risks and red flags with local HR management, and will explore any potential human rights issues or questions with HR.
Currently, all CEVA managers and a selected employee population are required to complete an annual C&E training that has incorporated elements of the HRCP to include awareness, red flags, and reporting concerning human trafficking and forced labor. Additional human rights trainings are provided to employees when warranted as a result of the compliance audits.

Further, CEVA addresses corruption risks, to include human trafficking, in our third party due diligence program, which is a dedicated risk-based program utilized to ensure that the third parties that CEVA conducts business with operate compliantly with all applicable laws. The incorporation of human trafficking questions into this third party due diligence process has allowed CEVA more insight into where risks lie, and how our high-risk third party agents and suppliers are dealing with them. Further, during 2019, human trafficking became one of the top issues that customers inquired about with CEVA, so not only does CEVA have information about internal initiatives to fight modern slavery, but has also been able to benchmark with our customers on what other companies globally are doing to combat human rights violations. CEVA also employs a global restricted party screening policy, whereby third parties can be screened to identify whether they are restricted parties or designated human rights violators. If screening confirms restricted party status of a third party, CEVA will not conduct business with that third party.

Risk Assessment and Continued Risk Management

In 2019, CEVA Compliance & Ethics underwent its annual global risk assessment, wherein every CEVA regional cluster received an assessment questionnaire, and provided feedback on a number of compliance matters, including human trafficking issues. Responses were received from all CEVA clusters, and all CEVA cluster managing directors are aware of human trafficking as a major compliance topic.

CEVA does not currently use any third parties to assist in mapping our supply chain, but has an experienced Global Trade Compliance (“GTC”) team that identifies and mitigates regulatory trade compliance risks throughout the global organization. GTC has included human trafficking in its risk profile, and will continuously identify risks and gaps pertaining to the HRCP, and in CEVA’s supply chain. The HRCP policies and procedures, as well as “red flags”, are published on CEVA’s internal website, and are accessible to all employees. CEVA has established several reporting mechanisms, such as anonymous reporting, for employees to report human trafficking and forced labor concerns. GTC diligently investigates any reports in these areas. CEVA also continues to monitor the regulatory landscape for human trafficking and forced labor regulations, and promotes awareness of the global issue internally and externally.

Whistleblower System

CEVA maintains a hotline and web-based reporting system, which allows individuals to report anonymously if desired in local language on any compliance concerns including concerns relating to labor practices or breach of human rights.

Conclusion

CEVA does not tolerate any violations of human rights laws by our employees and has established remedial measures contained in the HRCP that include suspension and/or removal of employees found in violation. CEVA will continue to update our policies and procedures as required to ensure that we maintain a high level of integrity and respect in our business operations as well as our supply chain.
This statement has been approved by the Board of Directors of CEVA Group plc, CEVA Logistics Limited and CEVA Freight (UK) Limited.

Signature
James Gill, Member of the Board of Directors
CEVA Group plc

Date
10/03/20

Signature
Christopher Walton, Member of the Board of Directors
CEVA Logistics Limited and CEVA Freight (UK) Limited