

## MODERN SLAVERY AND ANTI-HUMAN TRAFFICKING POLICY

### 1) PURPOSE

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.

We have 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 disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, 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.

### 2) SCOPE

This policy applies to all employees, contractors, external consultants, third-party representatives, suppliers and business partners.

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

### 3) RESPONSIBILITY FOR THE POLICY

The senior management team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director 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.

Employees 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.

#### 4) COMMITMENTS

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- a. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- b. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.
- c. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- d. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- e. We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our commitment to the prevention of Modern Slavery and Human Trafficking, setting out the minimum standards required to combat modern slavery and trafficking.

- f. Consistent with our risk-based approach we may require:
- i. Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our commitment to the prevention of Modern Slavery and Human Trafficking;
  - ii. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our commitment to the prevention of Modern Slavery and Human Trafficking.
- g. As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our commitment to the prevention of Modern Slavery and Human Trafficking.
- h. If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## 5) COMPLIANCE WITH THE POLICY

The prevention, detection and reporting of modern slavery in any part of the Company or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their Line Manager or the Managing Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

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

If an employee believes or suspects a breach of this policy has occurred, or that it may occur, they must notify their Line Manager or the Managing Director as soon as possible.

If an employee is unsure 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, they must raise it with their Line Manager or the Managing Director as soon as possible.

The Company aims 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. The Company 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 Company or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform their Line Manager or a member of the senior management team immediately. If the matter is not remedied an employee should raise the matter formally using the Company grievance procedure.

## 6) COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk the Company faces from modern slavery in its supply chains, forms part of the induction process for all employees and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in the Company and supply chains must be communicated to all suppliers, contractors and business partners at the outset of the Company's relationship with them and reinforced as appropriate thereafter.

## 7) BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Company may terminate its relationship with other individuals and organisations supplying or working on behalf of the Company if they breach this policy.