

Modern Slavery Policy

Anti-slavery and human trafficking policy

Policy Statement

- 1.1 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.
- 1.2 We have a zero tolerance approach to modern slavery across all areas of our organisation, as well as in our supply chains. We are committed to ensuring we are not connected to modern slavery in any way. We aim to ensure that our business operates in an open and transparent way and our approach to tackling modern slavery throughout our supply chains is consistent with our obligations under the Modern Slavery Act 2015.
- 1.3 We aim to work in partnership with all our contractors, suppliers and other business partners to ensure that they share and work towards the same values we hold against slavery and human trafficking. To manage this, 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. We also ask our suppliers to confirm their compliance with Modern Slavery Act 2015.
- 1.4 We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 1.5 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.
- 1.6 This policy does not form part of an employee's contract of employment and may be amended at any time.

2 Responsibility for this policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 2.2 The Chief Executive 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.
- 2.3 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.

3 Compliance with this policy

- 3.1 You must ensure that you read, understand and comply with this policy.

- 3.2 As part of our initiative we have in place systems to:
- 3.2.1 Identify and assess potential risk areas in our supply chains;
 - 3.2.2 Mitigate the risk of slavery and human trafficking occurring in our supply chains;
 - 3.2.3 Monitor potential risk areas in our supply chains; and
 - 3.2.4 Protect whistle blowers.
- 3.3 The prevention, detection and reporting of modern slavery in any part of our organisation 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.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or there is a risk of a breach occurring, then you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. 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 manager.

We 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 organisation 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 Human Resources immediately. If the matter is not remedied, an employee should raise it formally using our Grievance Procedure.

4 Training and awareness

- 4.1 We are committed to providing training on this policy and on the risks our organisation faces from modern slavery both within our organisation and in its supply chains. Training on this forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our commitment to addressing the issue of 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.

5 Breaches of this policy

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