

# MODERN (ANTI) SLAVERY POLICY

## 1. POLICY AIM

- a. 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.
- b. The Company has a zero-tolerance approach to modern slavery, and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business or in any of the Company's supply chains.
- c. The Company is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout the Company's supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.

## 2. POLICY SCOPE

- a. The Company expects the same high standards from all of its employees, consultants, agents, clients, suppliers, stakeholders and other business partners, and as part of the Company's engagement, contracting and procurement processes.
- b. The Company prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it is expected that the Company's suppliers and clients will hold their own suppliers to the same high standards.
- c. This policy applies to all persons working for the Company or on the Company's 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.
- d. This Modern (Anti) Slavery Policy and Statement is intended and will be applied in all countries in which the Company operates.

## 3. RESPONSIBILITY FOR THE POLICY

- a. The Company has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under its control comply with it.
- b. The Company 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.
- c. 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.

- d. Employees, consultants, agents, clients and suppliers 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 Company CEO.

#### **4. COMPLIANCE WITH THE POLICY**

- a. Employees, consultants, agents, clients and suppliers must ensure that they have read, understand and comply with this policy.
- b. The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control.
- c. Employees, consultants, agents, clients and suppliers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- d. Employees, consultants, agents, clients and suppliers must notify the Company CEO as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.
- e. Employees, consultants, agents, clients and suppliers are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.
- f. If it is believed or suspected that a breach of this policy has occurred or that it may occur, report it in accordance with this policy or the Whistleblowing Policy as soon as possible.
- g. It should be noted that where appropriate, and with the welfare and safety of local workers as a priority, the Company will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- h. If there is any doubt as to whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, raise it with the CEO.
- i. 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.
- j. In line with the Whistleblowing Policy, the Company is committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company's business or in any of the Company's supply chains.
- k. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- l. If it is believed that anyone has suffered any such treatment because of raising concerns under this policy, they should inform the Company CEO.

- m. For employees - if the matter is not remedied, they should raise it formally using the Company's Grievance Procedure, which can be found in the current employee handbook.

## **5. COMMUNICATION & AWARENESS OF THIS POLICY**

- a. Training on this policy, and on the risk the Company business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Company, and updates will be provided using established methods of communication.
- b. The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the Company's business relationship with them and reinforced as appropriate thereafter.

## **6. BREACHES OF THIS POLICY**

- a. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- b. We may terminate the Company's relationship with other individuals and organisations working on the Company's behalf if they breach this policy.

## **7. POLICY CHANGES**

- a. This policy does not form part of an individual's contract of employment and may be amended from time to time.