

## Anti-Slavery & Human Trafficking Policy

### POLICY STATEMENT

Modern slavery is a crime & a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced & compulsory labour & 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 & we are committed to acting ethically & with integrity in all our business dealings & relationships & to implementing & enforcing effective systems & 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 & in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers & other business partners, & 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, & we expect that our suppliers will hold their own suppliers to the same high standards.

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, apprentices, agents, contractors, external consultants, third-party representatives & business partners. This policy does not form part of any employee's contract of employment & we may amend it at any time.

This policy is made available to anyone requesting it within 30 days.

### RESPONSIBILITY FOR THE POLICY

The Managing Director has overall responsibility for ensuring this policy complies with our legal & ethical obligations, & that all those under our control comply with it. The Managing Director also has primary & day-to-day responsibility for implementing this policy, monitoring its use & effectiveness, dealing with any queries about it, & auditing internal control systems & procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand & comply with this policy & are given adequate & regular training on it & the issue of modern slavery in supply chains.

You are invited to comment on this policy & suggest ways in which it might be improved. Comments, suggestions & queries are encouraged & should be addressed to your immediate manager.

### COMPLIANCE WITH THE POLICY

You must ensure that you read, understand & comply with this policy. The prevention, detection & reporting of modern slavery in any part of our business 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.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur 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 aim to encourage openness & 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 own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, & you are an employee, you should raise it formally using our Grievance Procedure.

**COMMUNICATION & AWARENESS OF THIS POLICY**

Training on this policy, & on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, & regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors & business partners at the outset of our business relationship with them & reinforced as appropriate thereafter.

**BREACHES OF THIS POLICY**

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

We may terminate our relationship with other individuals & organisations working on our behalf if they breach this policy.

Signed:



C. C. James – Managing Director

Dated: February 2022