

Anti-slavery Policy

Policy Statement

It is our policy to conduct all of our business in an honest and ethical manner. This policy describes the workplace practices and ethical behaviour we require for all workers.

We will uphold all laws relevant to Anti-Slavery and will advance this through our company policies including Human Rights, Equal Opportunities, Health & Safety, Anti-corruption, Anti-bulling & Harassment and Whistle Blowing policy.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on anti-slavery; and
- provide information and guidance to those working for us on how to recognise and deal with anti-slavery issues.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who Must Comply With This Policy?

This policy applies to all persons working for us (or any Group Company) 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, sponsors, or any other person associated with us, wherever located (collectively referred to as **workers** in this policy).

What Are The Anti-slavery Principles?

Full details of the principles set out within the Modern Slavery Act 2015 can be found at <http://www.legislation.gov.uk>

Modern Slavery is a term used to encompass servitude forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

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:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- 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.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- 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.

- 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 Code of Conduct.
- 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.

How To Raise A Concern

You are encouraged to raise concerns about any issue relating to Anti-Slavery at the earliest possible stage to the HR Manager.

If you are unsure about whether a particular issue breaches the Anti-Slavery Policy, raise it with the manager or the HR Manager.

Protection

We are committed to ensuring no one suffers any detrimental treatment as a result of complying with this policy, or because of reporting in good faith their suspicion that failure to comply with this policy has occurred or will occur in the future. 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 the HR manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Training And Communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

Who Is Responsible For This Policy?

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.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring And Review

The HR manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All workers expected to comply with this policy, and submit their questions or concerns to their manager or the HR Manager.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR manager.