

Modern Slavery and Human Trafficking Policy

1. Purpose

This policy outlines STEM Connex commitment to preventing modern slavery, forced labour, and human trafficking within our operations and supply chains. We aim to uphold ethical recruitment practices and ensure that our business activities do not contribute to these violations.

2. Scope

This policy applies to all employees, partners, and suppliers of STEM Connex, including contractors and third-party service providers.

3. Commitment

We are dedicated to ensuring that our recruitment practices are transparent and compliant with the Modern Slavery Act 2015. We do not tolerate any form of modern slavery or human trafficking in our operations or supply chains.

4. Risk Assessment

Conduct regular risk assessments to identify areas susceptible to modern slavery and human trafficking, particularly in recruitment practices.

Evaluate suppliers and partners for compliance with modern slavery standards before engagement.

5. Due Diligence

Implement robust due diligence procedures to ensure that we are not complicit in human rights abuses. Require all suppliers and partners to adhere to our ethical recruitment policies and practices.

6. Staff Training

Provide training for all employees to raise awareness of modern slavery issues and the signs of forced labour and trafficking.

Ensure staff understand their responsibilities in identifying and reporting any concerns related to modern slavery.

7. Reporting Mechanism

Establish a clear process for employees and stakeholders to report concerns or suspicions related to modern slavery or human trafficking.

Ensure that reports are handled confidentially and without retaliation.

8. Monitoring and Review

Regularly review our policies and practices to ensure their effectiveness in mitigating risks associated with modern slavery and human trafficking.

Update our Modern Slavery Statement annually to reflect our commitments and actions taken.

9. Links to Our Modern Slavery Statement

For more information on our approach to modern slavery, please request our Modern Slavery Statement.

10. Compliance and Accountability

All employees are expected to comply with this policy, and failure to do so may result in disciplinary action. The responsibility for compliance with this policy lies with Bruce Simpson.