

2. Policy Statement

- 2.1. The company is committed to preventing modern slavery, human trafficking, forced labour, and exploitation in all its business operations and supply chains.
- 2.2. We have a zero-tolerance approach to modern slavery and will take all necessary steps to ensure that our employees, contractors, suppliers, and business partners adhere to ethical labour practices in compliance with the Modern Slavery Act 2015.
- 2.3. This policy applies to all aspects of our business, including recruitment, employment, and supply chain management.
- 2.4. We are dedicated to acting ethically and with integrity in all business dealings, implementing effective systems and controls to prevent modern slavery.
- 2.5. 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.
- 2.6. Our zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.7. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 2.8. We expect the same high standards from all of our contractors, suppliers and other business partners, and 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
- 2.9. 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.
- 2.10. This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Responsibility for the Policy

- 3.1. The company owner has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2. The company owner 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.
- 3.3. Line managers 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.
- 3.4. You 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 person responsible for this policy
- 3.5. The responsibility for ensuring compliance with this policy is shared across all levels of the company:
 - 3.5.1. Board of Directors & Senior Management

- 3.5.1.1. Provide leadership in combatting modern slavery.
- 3.5.1.2. Ensure that policies and procedures align with legal requirements.
- 3.5.1.3. Approve and oversee risk assessments and mitigation strategies.
- 3.5.2. Managers & Supervisors
 - 3.5.2.1. Implement and monitor modern slavery policies within their departments.
 - 3.5.2.2. Conduct due diligence on suppliers and contractors.
 - 3.5.2.3. Ensure employees understand and comply with this policy.
- 3.5.3. Employees
 - 3.5.3.1. Report any concerns or suspected violations of this policy.
 - 3.5.3.2. Adhere to ethical employment practices and conduct.
- 3.5.4. Suppliers, Contractors, and Business Partners
- 3.5.5. Ensure compliance with modern slavery laws and this policy.
- 3.5.6. Provide transparency about employment practices.

4. Compliance with the Policy

- 4.1. You must ensure that you read, understand and comply with this policy.
- 4.2. The prevention, detection and 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.
- 4.3. 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.
- 4.4. 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.
- 4.5. 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 Whistle-blowing Policy as soon as possible.
- 4.6. 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 or Head of Procurement.
- 4.7. We aim 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.
- 4.8. 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.
- 4.9. 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 Head of Procurement immediately.
- 4.10. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure
- 4.11. All individuals and entities covered by this policy must:
 - 4.11.1. Undergo training and awareness sessions on modern slavery.

4.11.2. Cooperate with audits and investigations.

4.11.3. Follow ethical recruitment, employment, and supply chain practices.

4.12. Failure to comply may result in disciplinary action, contract termination, or legal consequences.

5. Risk Areas for Modern Slavery in Employment and Supply Chain

5.1. The following table outlines practices that create risks of modern slavery at different stages of employment and supply chain management:

Stage	Risk Practices	Examples
Recruitment	Use of unlicensed or unethical recruitment agencies	Agencies charging workers recruitment fees, leading to debt bondage
	Misleading job advertisements	Workers promised different roles or wages than what is actually provided
	Coercive contracts	Workers are forced to sign contracts in languages they do not understand
	Withholding personal identification documents	Employers or agencies retain passports to prevent workers from leaving
	Lack of proper background checks on labour providers	Hiring through agencies with histories of exploitative practices
Employment	Forced or excessive overtime	Workers made to work long hours under threat of dismissal or penalties
	Unsafe or unhygienic working conditions	Lack of proper protective equipment, exposure to hazardous substances
	Low or non-payment of wages	Delays in wage payments or payments below legal minimum wage
	No access to grievance mechanisms	Workers discouraged or prevented from raising concerns about conditions
	Restriction of movement and surveillance	Workers monitored, controlled, or not allowed to leave the premises
	Exploitation of vulnerable workers	Migrant workers, refugees, or those with language barriers targeted for abuse
Exit from Employment	Threats or intimidation when workers try to leave	Workers told they will not receive owed wages if they resign
	Retention of final wages or benefits	Employers withhold last wages as a form of punishment
	Coercive contract terms preventing resignation	Employees locked into employment due to excessive repayment clauses
	Lack of clear exit procedures	Employers make it difficult for workers to leave by withholding necessary documents
Supply Chain	Lack of supply chain visibility	Companies unable to trace where raw materials are sourced from
	Use of subcontractors without proper oversight	Layers of subcontracting obscure accountability, increasing risk of exploitation
	Sourcing from high-risk regions	Materials or products imported from areas known for forced labour
	Use of child labour	Suppliers engaging underage workers, often in hazardous conditions
	Failure to audit and monitor suppliers	No due diligence conducted to check for compliance with ethical standards

	Poor working conditions at supplier sites	Workers exposed to extreme heat, unsafe machinery, or unsanitary environments
	Payment delays to suppliers	Suppliers forced to cut costs, potentially leading to exploitation of workers

6. Reporting Concerns of Modern Slavery

- 6.1. The company encourages a culture of openness and will protect those who report concerns in good faith. Any concerns should be reported to:
 - 6.1.1. Line Managers or HR Department
 - 6.1.2. Senior Management or Board Members We ensure that:
 - 6.1.3. Reports are treated confidentially.
 - 6.1.4. No employee or individual suffers retaliation for reporting concerns.
 - 6.1.5. Reports are investigated, and appropriate action is taken.

7. Consequences of Breaching this Policy

- 7.1. Breaching this policy is a serious offence. Consequences may include:
 - 7.1.1. For Employees: Disciplinary action, including dismissal.
 - 7.1.2. For Suppliers & Contractors: Termination of contracts and legal proceedings.
 - 7.1.3. Legal Penalties: As per the Modern Slavery Act 2015, individuals and businesses found guilty of modern slavery offences face severe penalties, including unlimited fines and imprisonment.
- 7.2. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.3. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

8. Communication and Awareness

- 8.1. This policy is communicated to all employees, suppliers, and stakeholders through:
 - 8.1.1. Training & Inductions: Mandatory for all employees.
 - 8.1.2. Supplier Agreements: Contracts include modern slavery compliance clauses.
 - 8.1.3. Regular Audits & Reviews: To assess risks and ensure compliance.
- 8.2. Training on this policy, and 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, and regular training will be provided as necessary.
- 8.3. Our zero-tolerance approach to 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.

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY DOCUMENTATION REVIEW
 To ensure that we comply with the requirements imposed by legislation our Modern Slavery and Human Trafficking

Policy Statement and Documentation will be reviewed periodically and at least annually.

DATE OF REVIEW	REVIEWED BY	BRIEF DESCRIPTION OF CHANGES	NEXT REVIEW DATE

