



# Modern Slavery Policy

*September 2023*

## Modern Slavery Policy

### 1. Overview and how we define Modern Slavery

- 1.1 Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.
- 1.2 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.
- 1.3 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- 1.4 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 1.5 Our Anti-Slavery Officer ('ASO') is **David Martin**. They are responsible for this policy.
- 1.6 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

### 2. Preventing Modern Slavery in our business

- 2.1 We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.

2.2 We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

[2.3 All employees are required to sign a copy of this policy to show they have read and understood it.

### **3. If you are one of our Suppliers**

3.1 If you supply us with goods or services, you must assess your business and supply chains and confirm to our ASO that you:

- Comply with your legal obligations, in relation to Modern Slavery; and
- Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.

[You must also provide a copy of your anti-slavery policy.]

3.2 If you breach this policy, or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

### **4. If you are an Employee or a Worker providing services for us**

4.1 You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO. Our ASO will investigate and report to our Board of Directors within a reasonable time, on actions which may require to be taken.

4.2 You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our ASO and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

### **5. Our Commitment**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

### Due diligence processes for slavery and human trafficking

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

### Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

There is a Company induction where our policies, procedures and expectations are outlined.

### Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- use of labour monitoring, right to work documentation and payroll audits;
- we maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectation; and
- we regularly review supply chain policies, codes of conduct and our working practices to show commitment.

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