

## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

### 1. Policy Statement

- 1.1. 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. 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.
- 1.2. 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. 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. About this policy

- 2.1. The purpose of this policy is to:
  - 2.1.1. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
  - 2.1.2. provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
- 2.2. 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, agents, contractors, and suppliers.
- 2.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 2.4. Responsibility for the policy
- 2.5. Management 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. Your responsibilities and how to raise a concern.

- 3.1. You must ensure that you read, understand and comply with this policy.

- 3.2. 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.
- 3.3. You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- 3.4. 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.
- 3.5. If you believe or suspect that 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.
- 3.6. 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 the Office Manager.
- 3.7. 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. 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 the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### **4. Commitments**

- 4.1. We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguarding 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 engage in, facilitate or fail to report any activity that might lead to or suggest, a breach of this policy;
  - We are committed with our stakeholders and suppliers to address the risk of modern slavery in our operation 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 human trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the

merits of writing to suppliers requiring them to comply with our procedures, which sets out the minimum standards required to combat modern slavery and trafficking;

- Consistent with our risk-based approach we require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our procedures.
- Suppliers engaging workers through a third party to obtain that third parties agreement to adhere to this policy.
- 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 procedures.
- 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.