

Modern Slavery Policy

Policy Statement

This policy statement sets out the Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Modern slavery is the severe exploitation of other people for personal or commercial gain and is a crime resulting in an abuse of the human rights of vulnerable people from the UK and overseas.

Modern slavery can take various forms, including:

- **Human Trafficking:** the process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain.
- **Forced Labour:** any work or service which people are forced to do against their will, under threat of punishment. Almost all slavery practices contain some element of forced labour.
- **Bonded Labour:** also known as debt bondage or debt slavery, it occurs when a person is forced to work to pay off a debt. They are tricked into working for little or no pay, with no control over their debt.
- **Child Slavery:** the enforced exploitation of a child for someone else's gain, meaning the child will have no way to leave the situation or person exploiting them.
- **Child Marriage:** this can be referred to as slavery if the child has not genuinely given their free and informed consent to enter the marriage, if they are subject to control in the marriage (particularly through abuse and exploitation), or if they cannot realistically leave or end the marriage.
- **Descent-based Slavery:** where people are born into slavery because their ancestors were captured into slavery and their families have 'belonged' to slave-owning families ever since.
- **Domestic Slavery:** domestic workers in private homes where the circumstances and conditions of their work amounts to slavery e.g. their employer stops them from leaving the house, doesn't pay their wages, uses violence or threats, withholds their identity documents, limits their contact with family and forces them to work.



Slavery in Supply Chains

Long and complex supply chains make it challenging to oversee who is working where and under what conditions, from the extraction of raw materials, the manufacturing of goods or the shipping and delivery of those goods to customers.

Slavery in the UK

Modern slavery is present in every area of the UK and can take many forms. The most common form of slavery in the UK is forced labour, more often found on farms and in construction, shops, bars, nail salons, car washes or manufacturing.

The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and

human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency, for example ensuring that the agency does not charge job seekers recruitment fees.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, is the responsibility of all those working for the Company or under the Company's control. Employees are required to avoid any activity that might lead to a breach of this policy.

If anyone believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with the Company's [Whistleblowers Policy](#). Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

If anyone is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, again it should be immediately raised. Matters can also be raised by contacting the government's Modern Slavery Helpline on 0800 0121 700, who are able to provide further information and guidance on modern slavery.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to be involved in modern slavery.