



HUMAN TRAFFICKING AND ANTI- SLAVERY POLICY

(Revised: October 2023 v4.0)

POLICY STATEMENT

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 have a 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 implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. 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 and we expect that our suppliers will hold their own suppliers to the same high standards.

COMPLIANCE WITH THE POLICY

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, external consultants, third-party representatives and business partners.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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.

You must notify your manager OR a Company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

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 Whistleblowing Policy as soon as possible. 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or a Company Director.

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 part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

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.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

REVIEW

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

THE ISSUE STATUS

The issue status is indicated by the version number in the footer of this document. It identifies the issue status of this Human Trafficking and Anti-slavery Policy.

When any part of this Human Trafficking and Anti-slavery Policy is amended, a record is made in the log shown below.

The Human Trafficking and Anti-slavery Policy can be fully revised and re-issued at the discretion of the Management Team.

Please note that this Human Trafficking and Anti-slavery Policy is only valid on day of printing.

Issue	Page(s)	Issue Date	Additions/Alterations	Initials
1.0	All	20/10/2020	Human Trafficking and Anti-slavery Policy First Authorised Issue	SF
2.0	All	20/10/2021	Policy reviewed, no amendments	SF
3.0	All	20/10/2022	Policy reviewed, no amendments	SF
4.0	All	20/10/2022	Policy reviewed, no amendments	SF