



## ANTI-SLAVERY and HUMAN TRAFFICKING POLICY STATEMENT

### Policy Statement

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 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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business; our supply chains; or our clients

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; or our clients, consistent with our disclosure obligations under the modern slavery act 2015. We expect the same high standards from all 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. **Who is covered by the policy?**

This policy applies to all persons working for us or on 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.

This policy applies to all employees regardless of length of service

This policy does not form part of an employee's contract of employment and we may amend it at any time.

3. **Scope and purpose of the policy**

The prevention detection and reporting of modern slavery in any part of our business or supply chains; or our clients is the responsibility of all those working for us or under

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our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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

You must notify you manager or the Company directors 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 or suspicion of modern slavery in any parts of our business; or our clients; or supply chain 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 Whistle Blowing 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 chains; or our clients constitutes any of the various forms of modern slavery, raise it with you manager, HR or the Company Directors.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if it turns out to be mistaken. We are committed to ensure no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of any form is or may be taking place in any part of our own business or in any of our supply chains; or our clients. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform the Company directors immediately in writing. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

4. The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company directors have primary 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 and human trafficking.

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, or clients.

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