

MODERN SLAVERY & HUMAN TRAFFICKING POLICY



This policy has been published in accordance with the provisions of the Modern Slavery Act 2015. It sets out the steps taken by the Company, to prevent modern slavery and human trafficking in its businesses and supply chains.

The Company has adopted as its values: **Knowledge, Ambition, Teamwork, Integrity and Passion**

With people at the centre of its core values, the Company looks to ensure that the Company and its responsibilities to the Modern Slavery Act 2015 are transparent within the Company and with the suppliers of goods and services to our Company.

We ensure that our policies respect human rights and recognise the rights of employees to have a respectful workplace.

For suppliers to our Company, we undertake a supplier approval process to ensure that all suppliers of goods and services adhere to this legislation and are required to sign a statement confirming said compliance.

With suppliers based outside of the EU the potential risk of noncompliance is higher, the management recognise this risk and will continually monitor the level of resource required for these suppliers. The Company is a member of Fortis Merchants, an industry buying group. All suppliers to the buying group meet the buying group diligence process.

The Company Directors and Senior Management team are responsible for the implementation and adherence of this policy. They also ensure that adequate resources and training will be available to ensure that human trafficking and slavery is not taking place within our Company or within our supply chain.

A copy of this statement is posted within the Company's own intranet system for all employees, and a copy posted on our websites for all additional stakeholders to our Company.

As ongoing improvement, the Company will

- Continue to identify ways to improve employee and supplier awareness and commitment to respecting human rights and the prevention of modern slavery and human trafficking
- Commit to keeping abreast of information, future legislation and best practise on the risks of slavery and human trafficking.
- Ensure Management system and practises within the Company continue to meet the required standards as set out by this legislation and the Company's commitment.
- Persist in the strengthening of its contracts and relationships with suppliers to ensure that it does not receive products/services that use slavery, human trafficking or other oppressive labour conditions in the supply to our Company.

Notification

You must notify a 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 or suspicion of modern slavery in any parts of our Company or 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 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 chains constitutes any of the various forms of modern slavery, raise it with a Director.

Communication and awareness of this policy

Training on this policy, and on the risk our Company faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

Breaches of this policy

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

This policy has been approved by the Company's Board of Directors.

Reviewed: August 2023
Next review date: August 2024

