

Modern Slavery and Human Trafficking Policy

1. Introduction

We take all possible steps to combat and prevent slavery and human trafficking.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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 are fully committed to preventing slavery and human trafficking in our business activities. 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 the Modern Slavery Act 2015.

2. Our Commitment

The Company is committed to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from its entire workforce, suppliers, contractors, and those with whom it does business.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf and the Company is committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

The Company acknowledges that a supply chain can present a risk of using an unknown subcontractor reliant on forced, compulsory labour or human tracking. Therefore, the Company takes its responsibility of tackling modern slavery seriously within its supply chains and adheres to the following principles:

- a. The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the Company or under its control;
- b. Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s);
- c. All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited. The Company's standard procurement and contract documentation addresses anti-slavery and anti-trafficking.

3. Reporting

The Company encourages anyone to raise any concerns about modern slavery, using its whistleblowing policy if necessary, and will support anyone who acts in good faith.

The Company encourages any individual that believes or suspects that a breach of this policy may occur, has occurred or has any concerns, to report it to their line manager immediately, or by following the Company's Whistleblowing Policy.

For advice and guidance, the Company encourages individuals to call the Modern Slavery Helpline on 08000 121 700 or visit <https://www.modernslaveryhelpline.org/>

4. Monitoring

The Company ensures that its recruitment and on boarding, equality, diversity and inclusion policies and remuneration and reward policies and procedures support its efforts to tackle modern slavery and human trafficking.

The Company will ensure that all policies will undertake continuous monitoring and review in line with legislation and other developments, to ensure that they are fit for purpose and continue to support efforts to tackle modern slavery and human trafficking.

Any breaches of this policy may result in the Company taking disciplinary action against individual(s) and/or terminating its relationship with any organization, supplier or contractor.