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## Modern-Slavery & Human Trafficking Policy

### Policy Statement

Modern Slavery is a crime & a violation of fundamental human rights. It takes various forms, such as:

- slavery
- servitude
- forced & compulsory labour & human trafficking.

Common amongst the forms is the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The company has a zero tolerance of modern slavery & is committed to :

- acting ethically & with integrity in all business dealings & relationships
- implementing & enforcing effective systems & controls to ensure modern slavery is not taking place anywhere in the business or supply chain.

The company are also committed to ensuring there is transparency in the business & in its approach to tackling modern slavery throughout the supply chain, consistent with the disclosure obligations under the Modern Slavery Act 2015. The company expects the same standards from all contractors, suppliers & other business partners, & as part of the contracting processes, with specific prohibitions against:

- the use of forced.
- compulsory or trafficked labour
- anyone held in slavery or servitude, whether adults or children

& expect that suppliers will hold their own suppliers to the same standards.

This policy applies to all persons working for the company on our behalf in any capacity, including:

- employees at all levels
- directors
- officers
- agency workers
- contractors
- external consultants
- business partners.

This policy does not form part of any employee's contract of employment & we may amend it at any time. However, a breach of the policy may result in disciplinary action.

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## **Responsibility for the Policy**

The directors have responsibility for ensuring this policy complies with our legal & ethical obligations & that all those under our control comply with it.

The MD has primary & day to day responsibility for implementing this policy, monitoring its use & effectiveness, dealing with any queries about it, & auditing internal control systems & procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand & comply with this policy and are given adequate & regular training on it & the issue of modern slavery in supply chains.

You are invited to comment on this policy & suggest way in which it might be improved. Comments, suggestions & queries are encouraged & should be addressed to the Office Manager.

## **Compliance with the Policy**

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

The prevention, detection & reporting of modern slavery in any part of the company or supply chain is the responsibility of all those working for the company & under its 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 the MD as soon as possible if you believe you 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 the business or supply chain at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chain constitutes any of the various forms of modern slavery, raised it with your line manager or the MD.

The directors encourage openness & will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The directors 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 the business or supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the MD immediately. If the matter is not remedied, & you are an employee, you should raise it formally using the grievance procedure.

## **Communication & awareness of this policy**

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

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Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors & business partners at the outset of the business relationship with them & 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.

### **Who is responsible for this policy?**

The directors have overall responsibility for ensuring that this policy complies with the legal obligations, & that employees & associates comply with it. The policy will be reviewed annually, with intermediate reviews which may become necessary.

### **Who must comply with this policy?**

This policy applies to all persons working for, or on behalf, of the company.



Neil Bray

Managing Director

1<sup>st</sup> January 2022