

Policy – Modern Slavery

Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other third-party representative.

We expect all who have or seek to have a business relationship, with the company to familiarise themselves with this policy and to always act in a way that is consistent with its values.

We will only do business with organisations who comply with this policy [or those who are taking verifiable steps towards compliance].

How we seek to embed our anti-slavery policy in practice

Where appropriate, we will undertake pre-screening of prospective suppliers [as part of our tender processes] in relation to the effectiveness of their existing safeguarding controls and practices [including, but not limited to those] in relation to preventing modern slavery occurring within their organisation [and within their own [first tier] supply chain.

High Risk Areas

We do not consider that our activities to be at a high risk of modern slavery or human trafficking.

The following policies strengthen our commitment to the practice of responsible corporate behaviour.

- Whistleblowing Policy
- Conduct and Standards Policy
- Environmental Policy

Due Diligence Processes for Slavery and Human Trafficking

We undertake due diligence when considering new suppliers, encourages long standing relationships, and makes clear our commitment to responsible corporate behaviour in all business activities.

Responsibility for this policy

The [board of directors] have overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The CEO will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All Senior Managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

Communication and employee awareness training

The CEO will ensure that relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes.

In addition, staff that interact with the supply chain will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the CEO.