

# MODERN SLAVERY POLICY



## Policy Overview

We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. This policy sets out our zero-tolerance approach to modern slavery, which is a crime and a violation of fundamental human rights.

## Who is this policy for?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, suppliers and business partners.

## Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking.
- forced work, through mental or physical threat.
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property.
- being physically constrained or to have restriction placed on freedom of movement.

## Our Commitment

We have a zero-tolerance to modern slavery, and acknowledge our responsibilities in relation to tackling modern slavery and complying with the provisions in the Modern Slavery Act 2015:

- We are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chain.
- We do not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- We are committed to internal transparency in our own business, with an ongoing review and due diligence of our internal practices, systems and controls, in terms of our labour force.
- We will not tolerate the use of child or forced labour, nor exploitation of children in any of our operations or supply chains.

## Child Labour

The definition Child labour, as defined by the International Labour Organisation (ILO) Convention is “work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child.

## Our policy on child labour

In the conduct of our business, we:

- Will not employ children that falls into the definition as stipulated by ILO Convention, notwithstanding any national law or local regulation;
- will comply with all other applicable child labour laws, including those related to age, wages, hours worked, overtime and working conditions;
- are against all forms of exploitation of children.
- will not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities;
- expects our business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate.

# MODERN SLAVERY POLICY



Should violation of these Principles become known to us, we will take serious action, including discontinuation of the business relationship.

## Due Diligence

We carry out due diligence processes, in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains, including conducting a review of the controls of our suppliers. In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to ensure that modern slavery is not taking place:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- promoting best practice in our procurement processes with the aim of eliminating the risk of modern slavery & human trafficking occurring in our supply chains;
- ensuring that our customers can be confident that the products they purchase from us are free of the taint of modern slavery & human trafficking;
- ensuring that our HR and Procurement teams have an awareness of the Act, and understand their role in supporting our policy on supply chain transparency;
- delivering training to staff on the information contained in this policy

## Compliance

- The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Employees and suppliers are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We 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 our own business or in any part of our supply chain. If an employee believes that they have suffered any such treatment, they should inform their manager immediately.
- Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- Training on this Policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

## Responsibilities

### Managing Director

- Overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

### Managers

- 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.
- Responsible for ensuring those reporting to them understand and comply with this Policy and are given any required training.

# MODERN SLAVERY POLICY



- Reporting any concerns raised by others or self, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future, to the Managing Director.

## **Everyone**

- Ensure all, read, understand and comply with this Policy.
- Responsible for reporting concerns, if anyone believes or suspects that a conflict with this Policy has occurred, or may occur in the future, this must be reported in accordance with our Whistleblowing Policy as soon as possible. Employees or suppliers are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

## **Policy Breaches**

- Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf, if they breach this Policy.

## **Policies**

We also have the following policies which further define our stance on modern slavery: Supplier Code of Practice and Human Rights Policy.