

MODERN SLAVERY POLICY

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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 we are committed to acting ethically and with integrity in all our business dealings and relationships.

We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

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 our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other compliance with this policy and the Modern Slavery Act 2015 and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

HR has primary and 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.

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

Warning Signs

Below is a list of warning signs to look out for (not an exhaustive list):

- Physical appearance – signs of abuse, looking malnourished or appear withdrawn
- Isolation – Rarely working alone, seemingly under the control or influence of another and rarely interacting with others
- Poor living conditions and suspicions of them living at the same address that they work
- Few personal possessions and wearing the same clothing again and again, sometimes clothing unfit for the work they are undertaking
- Unusual and long working hours with little or no break
- Avoiding eye contact, appearing frightened etc.

Compliance with the Policy

All employees, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives and business partners (“You”) must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this policy.

You must notify HR 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 business or supply chains of any supplier tier at the earliest possible stage.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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 HR.

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 of our supply chains.

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 HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure,

Breaches of the Policy

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

We may terminate our relationship with other individuals and businesses working on our behalf if they breach this policy.

Signature:-

A handwritten signature in blue ink, appearing to read 'Paul Harris', is written over a light blue rectangular background.

Paul Harris

Date:- 31st August 2021

Position:- Director

Review:- 31st August 2022