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## **MODERN SLAVERY POLICY**

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 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.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude 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 at all levels, directors, officers, agency workers, agents, contractors, external consultants, third-party representatives and business partners.

### **Compliance with the Policy**

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 chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager 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 of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it as soon as possible.

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 chain constitutes any of the various forms of modern slavery, raise it with your manager.

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 you believe that you have suffered any such treatment, you should inform your manager immediately.

### **Communication**

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.

### **Breaches of this Policy**

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.

### **Identifying slavery**

There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim.

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.
- This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often one builds up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

### **Reporting slavery**

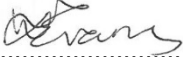
Talking to someone about your concerns may stop someone else from being exploited or abused. If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with the Line manager who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns with your line manager first before taking any further action.

### **Monitoring our procedures**

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

Signed:   
WILLIAM EVANS, DIRECTOR

Policy Date: 24<sup>th</sup> March 2023

Review Date: 24<sup>th</sup> March 2024