



Modern Slavery Policy

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Modern Slavery Policy

1. Introduction

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

We are also committed to ensuring there is transparency in our 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 standard from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in servitude or slavery. This is relevant whether children or adults and we expect our suppliers will hold their own suppliers to the same high standards.

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

2. Scope

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, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. Definitions

No definitions applicable

4. Responsibility

The Group Managing Director has overall responsibility for ensuring this policy is adhered to and that it complies with our legal and ethical obligations and that all those under the business control complies with it.

The Directors and Senior Management team are responsible for implementing the day to day compliance of this policy, monitoring its effectiveness, dealing with any queries about it and auditing the internal control systems to ensure that the company is effective in countering modern slavery.

Line managers at all levels are responsible for ensuring that those reporting to them are aware, understand and comply with the policy at all times and are given adequate training and regular training on this policy and the associated issues where relevant.

5. Compliance

All employees must read, understand and ensure they are compliant with this policy.

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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 with us under our control. You are required to avoid any activity that may lead to or suggest a breach in this policy.

You must notify your line manager as soon as possible if you suspect or believe 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 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 in accordance with the company Whistleblowing Policy if applicable as soon as possible.

If you are unsure whether or not a particular act, the treatment of workers more generally, or their working conditions within any tier of the business constitutes modern slavery, raise it with your line manager, Senior Management or HR Team.

We aim to encourage openness and will support anyone who genuinely raises concerns in good faith under this policy even if they turn out to be mistaken. We are committed to ensuring none suffers any detrimental treatment as a result of reporting in good faith their suspicion of modern slavery of whatever form is or may be taking place within our own business or suppliers. Detrimental treatment could include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, then you should raise this immediately to the Senior Management Team or HR Team. If the matter is not remedied and you are an employee, you can raise this formally through the Grievance Policy and Procedures.

6. Communication & Awareness of this Policy

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

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationships and as appropriate thereafter.

7. Breaches of this Policy

Any employee who breaches this policy, will face disciplinary action which could lead to 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 and our high standards expected in relation to modern slavery and the relative ethical and legal obligations.