

# Modern Slavery Act Policy

### **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. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery consistent with our disclosure obligations under the Modern Slavery Act 2015.

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

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

### **What do we mean by modern slavery?**

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical well-being or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

### **How we seek to embed our modern-slavery policy in practice**

To underpin our policy commitments, we are in the process of implementing the following measures:

- We will conduct regular risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery.
- Where appropriate, as informed by our risk assessment, we will engage directly with suppliers in respect of our modern slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses, and, where appropriate, agree how such measures could be enhanced.

### **Responsibility for this policy**

The Group Financial Director has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Group HR Director 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 Senior Managers will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training will form part of the Company's induction process.

Relevant staff will receive refresher 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 or director 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 Group HR Director.

### **Status of this policy**

This Modern slavery policy will be reviewed by the Company's Senior Managers on a regular basis.

This policy does not give contractual rights to company employees, suppliers or customers and we reserve the right to alter any of its terms at any time. The latest version of this policy will be available on the company website.