

Modern Slavery and Human Trafficking Policy

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 or commercial gain.

The company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains. We are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are 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.

Who does this policy apply to?

This policy applies to all persons working for us and on our behalf in any capacity, including employees at all levels, directors, agency workers, apprentices, interns, contractors and external contractors.

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

Management at all levels are responsible for ensuring those reporting to them understand and comply with the policy.

Compliance with the policy

All employees should ensure that they read, understand and comply with the 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. You are required to avoid any activity that might lead to a breach of this policy. You must notify your line manager or the MD 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 also encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains at the earliest possible stage. If you believe or suspect a breach of this policy has or may occur, you should notify your line manager or the MD.

If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of our supply chain constitutes any of the various forms of modern slavery, raise it with your line manager or MD to investigate.

If a specific case of modern slavery is identified within the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger, it should be reported via the standard 999 emergency number.

Suspected instances of modern slavery can also be flagged to the Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may witnessed an instance of modern slavery, or who may be a victim themselves, to call for more information on what to do next.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of making a report of modern slavery in good faith.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered such treatment, you should inform your line manager immediately and it will be fully investigated. If the matter is not resolved, you should raise it formally through the company Grievance Procedure.

Breaches of the policy

Any employee who breaches this policy will face disciplinary action, for which possible sanctions may be applied up to and including dismissal in line with the company Disciplinary Policy.

The company reserves the right to make changes to this policy at any time.