

Modern Slavery and Human Trafficking Policy



VERSION: May 2022

INTRODUCTION

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

This Policy sets out the Group's intention to identify and understand the risks posed by modern slavery to our business and to put in place steps to ensure that those at risks can be identified and mitigated.

SCOPE

This policy applies to all persons working for the Group or on our behalf in any capacity, including employees at all levels, directors, appointed representatives, registered individuals, contractors and suppliers.

COMMITMENTS

The Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation. We will continue to promote and encourage our suppliers to take steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or in any part of their businesses. We expect that our suppliers will hold their own suppliers to the same high standards.

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- To have a zero-tolerance approach to modern slavery in our organisation and our supply chains
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us, on our behalf or with us. Staff must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our policy, which sets out the minimum standards required to combat modern slavery and trafficking

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policy.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our policy.



- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policy.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This will include considering terminating such relationships.

OUR EXPECTATIONS

The Group adhere to the following standards and expect those involved in any stage of our supply line to follow the same standards:

- Respect the human rights of their employees and comply with all relevant legislation, regulations and directives
- Prohibit forced labour (slavery) and human trafficking in their supply chain and give their employees the right and ability to leave employment if they choose
- Prohibit child labour
- Ensure that wages meet legally mandated minimums without unauthorised deductions.
- Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level

MODERN SLAVERY STATEMENT

The Modern Slavery Act 2015 requires that the Group publishes a Modern Slavery Statement annually, which sets out what steps the organisation has taken during the financial year to ensure that modern slavery is not occurring in the supply chain or our own organisation.

The statement should include the following headings:

- a. The organisation's structure, its business and its supply chains
- b. its policies in relation to slavery and human trafficking
- c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains
- d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk
- e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate
- f. the training about slavery and human trafficking available to its staff

The statement must be approved annually by the Board, signed by a director including the name and job title. The statement should be published on the Company's website with a link from the home page, within six months of year end.

REPORTING

Employees 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. 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 or the Company Secretary.