



MODERN SLAVERY POLICY

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It can take on various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which deprive a person of their liberty 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.

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, agents, contractors, external consultants, third-party representatives and business partners.

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 HR Department has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The policy is monitored regularly to ensure its effectiveness and any queries should be directed to this department.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

COMPLIANCE WITH THE POLICY

We take a zero-tolerance approach to modern slavery, in any form.

The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If anyone believes or suspects that a breach of this policy has occurred, or may occur in the future, they must notify their manager or the HR Departments immediately. This can also be reported in accordance with our Whistle Blowing Policy.

If anyone is unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, they should raise it with their manager or the HR Department.

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



COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

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.