



# MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, requires suppliers, subcontractors and other business partners we contract with to confirm their commitment to comply with the Modern Slavery Act 2015.

The company accepts that it has a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the company or on the company's behalf in any capacity, including employees, directors, officers, agency workers, agents, subcontractors, consultants, volunteers and business partners.

## RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring that this policy complies with the company's legal and ethical obligations.

The commercial director is responsible for implementing this policy and for investigating allegations of modern slavery in the company's business and supply chain. Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

System audits will be used to ensure that procedures are being followed and are effective in preventing or remediating the risk of modern slavery.

## COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the company or under the company's control. All employees are required to avoid any activity that might lead to a breach of this policy.

If an employee believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with the company's Public Interest Disclosure Policy (Whistleblowing). Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the company's business or supply chains as soon as possible.



If you are unsure about whether a particular act, the treatment of workers or their working conditions constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 or visit [modernslavery.co.uk](https://www.modernslavery.co.uk) for further information and guidance on modern slavery.

The company aims 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. Furthermore, the company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of having reported in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

### **TRAINING AND COMMUNICATION**

Training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to all appropriate staff, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The company's zero tolerance approach to modern slavery must be communicated to all suppliers, subcontractors and other business partners whenever entering into new or renewed contracts with them.

### **BREACH OF THE POLICY**

Breach of this policy by an employee will result disciplinary action and, following further enquiry, may result in dismissal for gross misconduct.

Where a supplier, subcontractor or other business partner are found to be in breach of the Modern Slavery Act 2015 the company will report its findings and immediately terminate its commercial relationship with that organisation.



**KEVIN VALENTINE | MANAGING DIRECTOR**  
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