

Anti-Slavery & Human Trafficking Policy

Policy Statement

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 involve the deprivation of a person's liberty by another or others, in order 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.

We wish to ensure modern slavery is not taking place anywhere in our business.

In accordance with the provision of the modern Slavery Act 2015 ("the Act") we will comply with any disclosure obligations imposed upon us by the Act. We expect the same high standards from all of our contractors, suppliers and other business partners and we expect that they will hold their own contractors, suppliers and business partners to the same high standards.

This policy applies to all people working for us on our behalf in any capacity, including our officers, directors, employees at all levels, agency workers, agents and 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 Board of Directors has overall responsibility for ensuring that this policy complies with our legal requirements under the Act, our ethical obligations and that our employees at all levels comply with it.

We are responsible for ensuring that all employees understand and comply with this policy by making it easily accessible.

Compliance with the policy

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

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or a breach of it has occurred or may occur.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage. If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier or our supply chain constitutes any of the forms of modern slavery, raise it with your line Manager as soon as possible.

We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith of 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.

Training on this policy and on the risk our business faces from modern slavery in its supply chains is communicated to all people who work for us including training where necessary.

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 we become aware that they are in breach of this policy.