

# Anti-Slavery and Human Trafficking Policy



*April 2025  
The HR Manual  
Policy Number: 22  
Owner: HR Department*

## Policy Amendments

<b><u>Rev</u></b>	<b><u>Date</u></b>	<b><u>Revision Description</u></b>
2	04/04/2025	Amendment page added, Review date removed

## Policy Statement

- Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour, indentured servitude 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, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.
- Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.
- In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through practical and reasonable due diligence processes 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, volunteers, agents, contractors, consultants and business partners. The affirming of anti-slavery and human trafficking policy when entering into new or renewing contracts with suppliers

## 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, both throughout the Company's Supply Chain and internally within the Company. The Purchasing Manager has day-to-day responsibility for implementing this policy throughout the Supply Chain and for monitoring its use and effectiveness to ensure they are effective in preventing or remediating the risk of modern slavery, including responsibility for investigating allegations of modern slavery in the Company's supply chains.
- The HR Manager will have day-to-day responsibility for implementing and monitoring this policy with regard to the Company's treatment of internal company staff.

- Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

## 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. You are required to avoid any activity that might lead to a breach of this policy.
- If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures. You 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 within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager in the first instance. You can also contact the Government's Modern Slavery Helpline on 0800 0121 700 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting 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.
- The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts.

## Training and communication

- Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who are involved in managing recruitment and our supply chains. Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

## Supply Chains

- We thoroughly check supply chains for material suppliers to ensure the potential for slavery and human trafficking is significantly reduced. We tell the companies we do business with that we are not prepared to accept any form of exploitation.

All our material supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

## Recruitment using agencies

Our recruitment team follows firm policy and only uses agreed specified reputable recruitment agencies. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks
- investigating reputation
- ensuring the staff an agency provides have the appropriate paperwork (eg work visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review, at least every 3 years.

## General Recruitment

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work. We always ensure staff are legally able to work in the UK.
- We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures.

## Breach of the policy

- Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.
- The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

### Policy History

Version	2
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### HR MISSION STATEMENT.

To support, develop and advance the business through our robust policies and procedures, enabling people to thrive in a culture of fairness and continuous improvement, where every employee is valued and heard