

POLICY AD

ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

Modern Slavery is a crime and violation of human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company is committed to ensure that no modern slavery or human trafficking takes place in any part of the business or its' supply chain. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business activities, relationships and implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in its own business or in any of the Company's supply chains.

The company expects the same high standards from all our contractors, suppliers and other business partners and as part of our contracting processes, it includes specific prohibitions against the use of modern slavery, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Company or on behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third party representatives and business partners.

Responsibility

The board of directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and the Executive Assistant has overall day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries, auditing internal control systems and policies and procedures to ensure they are effective in countering modern slavery.

Line Managers are responsible for ensuring that all their direct reports understand and comply with this policy.

Compliance

All employees must ensure that they read, understand and comply with this policy. All employees are responsible for prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains whether in the UK or abroad. 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 this policy they must report it directly to their line manager or their line managers' manager. All employees are encouraged to raise any concerns, even if they are unsure with their Line Manager or a Director. The Company would like to encourage openness and will support any employee who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken and the Company is committed to ensure no one suffers any detrimental treatment, as a result of reporting a genuine concern.

Training and communication

Training on this policy and on the risk the Company faces from modern slavery in its supply chains, will be provided as necessary. The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners from the beginning of the business relationship and reminded thereafter.

Any breach of this policy is a disciplinary offence and will be dealt with under the Company's disciplinary procedure.