

## MODERN DAY SLAVERY AND LABOUR

### SCOPE

The Company fully recognises that the modern world still has many issues which result in the unfair treatment of individuals, not just in employment of its own workers. It is therefore fully committed to driving out acts of modern-day slavery and human trafficking within its business from within its supply chains, including sub-contractors, and partners. This policy therefore details how the Company shall endeavour to ensure that in all aspects it shall take every reasonable steps to adopt a fair and balanced policy in respect of its labour, whether these are directly employed or operating within its supply-chains.

### MODERN-DAY SLAVERY

The Company will not support or deal with any business knowingly involved in slavery or human trafficking, and consequently recognises and shall adopt the principles within the Modern Slavery Act 2015 to ensure transparency within the organisation and its supply-chains, which shall include any relationships it has with its suppliers of goods and services. As part of this the Company's shall apply due diligence processes into any of its supplier approval processes to minimise any such risk, to include a review of the controls undertaken by the supplier to eliminate slavery and human trafficking from within its own supply-chains. It is fully recognised by the Company that imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored and updated as appropriate.

The Company Directors and Senior Management shall take responsibility for actively driving compliance from all its stakeholders within its business. In doing so the Directors and Senior management shall ensure that all workers within the organisation are aware of this policy and its objectives and shall be provided with adequate resources (training, etc.) and relevant investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

This policy and access to the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained via this link: <http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted?view=plain>

### LABOUR STANDARDS

The Company fully acknowledges its obligations towards all workers directly engaged and recognises that it has an obligation towards employees, stakeholders and the communities in which it works. This policy therefore outlines how the Company will ensure it adopts fair and equitable treatment towards all parties so engaged by it.

#### Minimum Labour Standards

The Company has identified the following compelling reasons to establish a comprehensive system of minimum labour standards to guide its operations as below:

1. Ethical Responsibility – the Company acknowledges its obligations towards its employees, stakeholders and the communities in which it works and operates. The Company wishes to carry out work and to do business in an ethical fashion;
2. Adverse Publicity and Damage to the Company's Reputation – adverse publicity from the discovery of poor labour standards within the Company's business operations presents reputational and structural risks to the Company. Poor labour standards can lead to poor recruitment and staff retention, loss of trust and confidence with suppliers and within the wider community;
3. Reduced Quality of Service – the Company recognises that it needs to exceed the minimum labour standards to ensure it achieves quality of service.

Given the above, the Company shall ensure that all stakeholders shall be made fully aware of the below standards and give appropriate training where necessary to ensure they are able to comply with these;

1. Child Labour – the Company does not and will not engage in or support the use of child labour;
2. Forced or Compulsory Labour - the Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation;
3. Health and Safety – the Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injuries. Refer to the Company's Health and Safety policies;
4. Freedom of Association – the Company will comply with its obligations in respect of labour relations legislation;
5. Discrimination – the Company shall not engage in or support any discriminatory practices and these are more specifically detailed within the Company's Equal Opportunities policy;
6. Disciplinary Practices – the Company shall treat all employees fairly, giving due regard to the documents and available Disciplinary and Grievance processes;
7. Working Hours – the Company shall comply with applicable laws and regulations;
8. Remuneration – the Company shall comply with all applicable laws and regulations;

The Company Directors and Senior Management shall take responsibility for actively driving compliance from all its stakeholders within its business in respect of the application of and compliance with the above minimum standards. Wherever possible, the Company and all its stakeholders will endeavour to apply standards that are higher than those stated but shall not fall below these. In order to do so, the Directors and Senior Management shall ensure that all workers within the organisation are aware of this policy and its objectives and shall be provided with adequate resources (training, etc.) and relevant investment to ensure that it can adopt at least the minimum standards as stated within its business operations.

The Company also commits to periodically reviewing this policy to continually improve its approach to Modern-Day Slavery and Minimum Labour Standards within the workplace; taking into consideration changes in legislation and any other requirements to ensure the adequacy, suitability and continuing effectiveness of this policy.