

Modern 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 have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or any of our supply chains.

We are also committed to ensuring transparency in our business and approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to have their own suppliers to the same high standards.

About this policy

The purpose of this policy is to:

- set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- provide information to those working for and on our behalf on identifying and reporting concerns regarding modern slavery and human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. 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 directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they effectively counter slavery. The effectiveness of the policy will be managed through the KPIs listed within the Modern Slavery Statement. Any concerns raised through the whistleblowing policy or any other grievance mechanism will be managed appropriately.

We will ensure all suppliers are managed closely to ensure compliance with this policy and all related aspects of regulation and legislation.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.

You are invited to comment on this policy and suggest ways to improve it. Comments, suggestions and queries are encouraged by email.

Your responsibilities and how to raise a concern

All employees and those who work on our behalf must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You must 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 breach of this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect that a breach of this policy has occurred or may occur, you must notify your manager or report it per our Whistleblowing Policy as soon as possible.

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager in the first instance.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any of our supply chains. Treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Training and communication

Training in this policy and the risk our business faces from modern slavery in its supply chains forms part of the annual training for all individuals who work for us.

Our commitment to addressing the issue of 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.

Any supplier we work with is managed closely by them to ensure compliance with this policy and all related aspects of regulation and legislation.

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 employ a zero-tolerance attitude towards Modern Slavery and Human Trafficking. We will terminate any relationship with individuals and organisations working on their behalf if they breach this policy and cannot remediate any issues immediately.

Strong confidence must be provided to us that future issues will not arise for the company to consider any future dealings with such a party.

A handwritten signature in black ink, appearing to read 'John Naybour', with a stylized, flowing script.

John Naybour
CEO