

Slavery, Human Trafficking and Child Labour Policy

1. Introduction

We are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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 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 and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our 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, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Our partnership focus:

Our Policies on Slavery & Human Trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking.

As part of our initiative to identify and mitigate risk we have reviewed all our supply chain and subcontract documentation and have updated our corporate social responsibility policy to include slavery. Facilitate Spaces is audited by external auditors in compliance of ISO standards. In addition to monthly internal ISO audits by our Compliance Manager.

We have in place systems to:

- 2.1 Identify and assess potential risk areas in our supply chains.
- 2.2 Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- 2.3 Monitor potential risk areas in our supply chains.
- 2.4 Supplier Adherence to our Values.
- 2.5 To ensure all those in our supply chain and contractors comply with our values and ethics, our Compliance team works closely with the Operations team to ensure the prevention of slavery is incorporated into the company's document management systems.
- 2.6 The compliance manager's remit is to ensure all of our business partners comply with the high standards which we set for ourselves and ensure that their own organisations and supply teams are free from slavery and human trafficking.

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3. **Training.**

- 3.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide training to our senior staff.
- 3.2 Our Effectiveness in combatting slavery and human trafficking.
- 3.3 We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:
- 3.4 Monitoring of supplier agreements/annual turnover for compliance and adherence.
- 3.5 Ensuring proof of eligibility to work in the UK is sought for our employees and assurances that this is carried out by our subcontractors and suppliers.

4. **Our policy on child labour.**

We require all our suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular:

- 4.1 children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and
- 4.2 those under 18 must not be required to perform hazardous duties.

5. **Further Steps.**

- 5.1 We will review our policies to ensure that there is no slavery or human trafficking in our supply chains and we will take the further steps to combat slavery and human trafficking such as requesting copies of supplier slavery statements on an annual basis in line with legislation.
- 5.2 This statement is made pursuant to section 54(1) of the Human Slavery Act 2015.
- 5.3 We are committed to active promoting best practice in our procurement processes with the aim of eliminating the risk of modern slavery & human trafficking occurring in our supply chains. Learn more about our commitment to fight modern slavery:

6. **What this policy means for you:**

- 6.1 We require all our staff, suppliers, contractors, agents and all other individuals and businesses with whom we work, to comply with this policy and our approach to modern slavery and human trafficking.
- 6.2 We require all relevant individuals:
 - (a) to read and ensure they understand this policy.
 - (b) to report any behaviour which they believe may breach this policy to an appropriate manager.
 - (c) to communicate our policy to all relevant colleagues and business partners whenever appropriate; and
- 6.3 We require all businesses with whom we work:

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- (a) to adopt policies and procedures within their own businesses to enable them (and their staff) to comply with this policy.
- (b) to ensure that their staff hiring practices (including for the hiring of temporary staff via agencies and similar providers) are designed to establish that all workers are giving their labour of their own volition and are not being controlled by others to any extent;

6.4 We may terminate our relationship with suppliers and other business partners if they breach this policy.

This policy has been approved & authorised by:

Name: Stephen Butcher

Position: Managing Director

Date: January 2025

Signature:

A handwritten signature in black ink, enclosed within a dashed rectangular box. The signature is stylized, featuring a large, sweeping 'S' that loops around and under the rest of the name.