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Level 2 Secondary Policy

Anti-Slavery Policy

Objective

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 to exploit them for personal or commercial gain.

LabWare has 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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Policy

We are committed to ensuring there is transparency in our business and in our approach to rejecting modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect these standards from all of our contractors, suppliers and other business partners, and we will 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.

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

LabWare has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

LabWare has 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 are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

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Compliance with the policy

You must ensure that you 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 are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with 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 a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director as soon as possible.

If you are unsure about 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 line manager or company Director.

We aim 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. 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 in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

Communication & awareness of this policy

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 work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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 may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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Level 2 Secondary Policy

Policy Reviewed By: DocuSigned by: Christian de Franceschi 6CE633E3E32A409...

22 febbraio 2024

Christian De Franceschi

European Managing Director

Organisation

The following roles and responsibilities are responsible for implementing the undertakings set out in this policy.

Policy and compliance to Law	Christian De Franceschi (Managing Director)
Operation of Policy	Neil Parker (QA Manager)
Data Controller	Neil Parker (QA Manager)
Proactive communication of Policy	Christian De Franceschi (Managing Director) Steve Broad (Services Director) Richard Hillhouse (Business Services Manager) John Perry (Product Support Director) Louise Allen (Financial Controller)
Reporting incidents or requesting advice	Every Employee

Undertakings

This policy and its implementation will be reviewed yearly against the current ISO standards as part of the annual management review. All records associated with this policy (including review records) will be indexed and filed in the Employment file and scanned by the Office Manager and managed according to our QA procedures. Its effectiveness will be reported in the management review report. Any indication that the policy is not effective will result in positive action, as appropriate.