



Modern Slavery & Human Trafficking Policy

The Modern Slavery Act 2015 requires commercial organisations in the UK, with an annual turnover of £36M (or more), to produce a statement in relation to Modern Slavery & Human Trafficking within the organisation (including Supply Chain).

This statement commits our business to the principals & requirements of the Modern Slavery Act.

We have a zero-tolerance approach to Modern Slavery & Human Trafficking.

We are committed to acting ethically & with integrity, in all our business dealings.

We are committed to implementing & enforcing effective systems ensuring that:

- Promote a high level of understanding of the risks of modern slavery & human trafficking.
- That we pay all staff at least the national minimum/living wage rate applicable.
- We comply with all legislation, importantly the Immigration & Modern Slavery Acts.
- We build long standing relationships & operate thorough 'due diligence' with our Supply Chain (Contractors & Suppliers).
- Staff are made aware of individual obligations in respect of Modern Slavery & Human Trafficking.
- Staff who have concerns about Modern Slavery &/or Human Trafficking, are encouraged to raise these concerns using our Work Safe Policy 030 (Whistle Blowing).
- All staff have a written Contract of Employment.
- We operate a robust Recruitment & Selection Policy (024).
- We conduct 'eligibility to work in the UK' checks for all staff.
- Staff know their statutory rights & benefits they are entitled too (sick pay, holiday pay, etc).
- We prevent human rights violations within our own operations & our supply chain.
- We post this policy on our website & notify the HMRC (our turnover exceeds £36M).

We expect high standards of compliance from all our Supply Chain Partners & expect them to:

- They have taken steps to eradicate Modern Slavery & Human Trafficking within their business.
- Hold their own suppliers to account over Modern Slavery & Human Trafficking.
- Pay their employees at least the current national minimum/living wage.

We may terminate a contract with a Supply Chain Partner at any time, should any instances of Modern Slavery or Human Trafficking become known.

We have several Company Policies contained in our Staff Handbook that support this Policy.

This policy will be reviewed annually, or as significant change occurs (whichever is the earlier).

Signed:

A handwritten signature in black ink, appearing to read 'Shaun Nugent', is written over a horizontal line.

Date: 01.02.25

Shaun Nugent - Chief Executive Officer