QM19b MODERN SLAVERY, HUMAN TRAFFICKING and LABOUR RIGHTS POLICY

IMS OF Smithfield Company Limited is committed to ensuring that there is no modern slavery or human trafficking as introduced in section 52 of the Modern Slavery Act 2015 within our business, our supply chains or any part of our business including Service contractors.

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.

Effectiveness in opposing slavery and human trafficking.

As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier which will be continually monitored through supplier audit. IMS Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources through training to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains. Including to this Labour wages, Workplace Safety and Health, Working Hours, Job Security and Benefits, Labour Rights, Diversity and Inclusion are also monitored and looked after for the wellbeing of the staff.

To ensure a high level of understanding of the risks of modern slavery and human trafficking to our employees in our business and supply chains. We provide training to relevant staff concerning slavery and human trafficking, including disciplinary procedures where they are breached.

The management ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of BRC 9 and STS.

We have a transparent supply chain, which we have implemented with a robust technical and traceability systems to ensure that our products are responsibly sourced from suppliers whose values are aligned with our own.

IMS Whistleblowing Policy / Whistleblowing Line

IMS Company encourages and supports any individuals who raise genuine concerns to ensure that no one suffers as a consequence. The company has a robust and established Whistleblowing Policy that is bought to the attention of all IMS employees. The policy is published on staff notice boards and communicated to staff as part of our induction training. Additionally, there is an anonymous confidential hotline in place. Information communicated to staff is translated in multi lingual languages and in English for all our staff.

This confidential helpline is available to all employees and managed entirely independently by HR who will investigate any complaints made.

Measuring Effectiveness – Performance Indicators

In order to monitor the effectiveness of the steps taken by IMS Company to prevent slavery and trafficking the company will use the following indicators on an ongoing basis: -

▪ Detailed monitoring /recording of all complaints received via our Private Hotline.

▪ Ongoing training of existing and new people to ensure full understanding of the commitments of the Modern Slavery Act and ethical trading initiatives.

▪ Providing Internal ethical training awareness to key people.

▪ Commitment to continuous improvement and thus a review of our recruitment and induction practices.

▪ Full review and audit of transportation practices to and from work.

▪ Translation of relevant policies into most commonly spoken languages other than English.

A full copy of this policy on Modern Slavery Act 2015 and 2016 will be accessible to all employees on notice board and can be obtained from the HR department upon request. This policy statement will be reviewed annually.