

Policy

Modern Slavery Policy

Classification: Public

Anti-Slavery and Human Trafficking Statement

Reviewed:	September 2022 in respect of actions taken in the period ending 27 August 2022 and for the year ahead and constitutes our slavery and human trafficking statement for the financial year ending 26 August 2023.
Next Review:	September 2023
Application:	Smiths News plc and all companies within the Group ("Smiths News")
Legislative Framework:	This statement is made pursuant to The <i>Modern Slavery Act 2015 s.54(1) (UK)</i>

Smiths News

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smithsnews.co.uk

Introduction

Smiths News is a specialist distributor and a leading supply chain partner in newspaper and magazine wholesaling and distribution. While our business is primarily in the UK market, we do service the specialist printed and digital media needs of airlines and travel points worldwide.

Smiths News employs around 1,500 people worldwide and has business operations, directly or indirectly, in 4 countries, principally through its international media business, Dawson Media Direct Limited. We have registered subsidiary companies in Germany, Hong Kong and Australia (companies in Turkey and Thailand are in the process of being deregistered).

Smiths News has a global annual turnover of c£1.1n. To find out more about the nature of our business, please see our website at: <http://www.smithsnews.co.uk/>

Our Anti-Slavery Position

Smiths News is fully committed to preventing acts of modern slavery and human trafficking from occurring within our businesses as well as our supply chains, and we impose the same standards on our suppliers as we apply to ourselves. We take a zero-tolerance approach to non-ethical practices and we are committed to acting professionally, fairly and with integrity in all our business dealings and supply chain relationships, wherever we operate, implementing and enforcing effective systems to uphold ethical standards and to combat modern slavery and human trafficking.

“Modern Slavery” for us means the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude, including human trafficking. Management, staff and the suppliers we work with are expected to be alert to the risks of modern day slavery and we have a reporting line to bring any concerns to the attention of management who will act on all reports.

We expect anyone who has any suspicions of modern slavery in our business or our supply chain to raise their concerns without delay (or fear of reprisal). We will keep any information provided completely confidential.

Smiths News’s Structure and Role in the Supply Chain

Our Structure

Smiths News is the UK’s largest newspaper and magazine wholesaling business with an approximate 55% market share. We distribute newspapers and magazines on behalf of the major national and regional publishers, delivering to approximately 24,000 customers across England and Wales on a daily basis.

Dawson Media Direct supplies newspapers, magazines and inflight entertainment technology and content to over 80 airlines in 50 countries. Delivering to strict time windows with security accreditation, DMD serves the specialist needs of airlines and travel points in the UK and worldwide with printed and digital media.

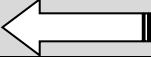
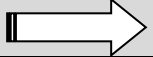
Outsourcing: In 2019/20 we established an outsourced finance, IT and customer experience function in India, with a specialist outsource service provider. As one of our core partners, our outsource service provider is committed to ensuring our standards and ethics are applied across our whole business and thus subscribes to our policies and procedures, specifically as applied to the prevention of modern slavery. A comprehensive due diligence process was undertaken with the outsource service provider prior to the conclusion of our agreement and they were found to robustly support an anti-modern slavery stance in line with best practice. We have a dedicated team of professional people situated in India within a Smiths News branded facility, which meets our requirements, including in respect of health and safety standards. Senior management have regularly visited the site and has oversight of the facility and direct engagement with the staff. We regularly carry out both internal and external audits of our overseas operations from a health & safety, colleague welfare, fit for purpose facilities and policies and compliance perspective.

Our Operating Model

We operate one of the fastest supply chains, seven days a week, delivering, collecting and processing returns across a fragmented customer base. The vast majority of our collections and deliveries are completed before 6.30am operating out of 36 depots. This requires a dedicated work team of shift, contract and part-time workers. We acknowledge that this type of work has an inherent Modern Slavery risk to which we are alert.

We carefully monitor the sources of our workforce and our employment policies support the individuals’ right to offer their services in exchange for a fair wage. Due to the nature of the business, we have a number of contracted and/or temporary workers. We have strict policies and processes to regulate how we deal with both recruitment agencies for the supply of temporary resource and independent service providers (ISPs) who provide composite delivery services across the business with the focus on an individual’s right to work in the relevant jurisdiction and ensure fair and transparent payment practices. We adhere to the minimum wage provisions and additional provisions applicable to night workers in respect of maximum weekly working hours and rest breaks.

Our Supply Chain (Up and Down Stream)

 Upstream	 Internal	 Downstream
Publishers / Goods & Service Providers	Warehouse and distribution	Retailers
The Company's services principally include providing distribution and logistics services to our customers and suppliers in the United Kingdom. This means that we do not deal in large volumes of inventory originating overseas. Based on our risk mapping exercise, we do not believe that we are at risk of modern slavery within our wider supply chain; however, we remain vigilant to the risk and continue to communicate to our suppliers and customers our expectations about the standards on which they conduct business. The main product we distribute is print media, which does present an area of indirect risk within our upstream supply chain through print and information technology suppliers, as well as paper mills, ink manufacturers and the sourcing of timber. Once again, we require our suppliers to comply with our policies and position on Modern Slavery and periodic audits will be undertaken as and when necessary. In support of our main business, we also procure goods and services which range from consultancy and cleaning services, to electronic equipment, uniforms and stationery, to mention but a few. We acknowledge that a number of these indirect or "non-distribution" goods and services may be at risk of Modern Slavery. We currently require all suppliers to commit to our Modern Slavery position and remain vigilant to any emerging risks. Our procurement department also undertakes periodic screening as part of the appointment and renewal process for suppliers.	As part of our distribution business, we employ managerial and support staff as well as drivers and warehouse operatives. Some of our staffing requirements are filled directly through subcontractors and independent service providers (ISPs) (whether self-employed sole traders or limited companies) and agency staff through temporary labour agencies. We believe that the risk of modern slavery within our direct and indirect workforce is low; however, we acknowledge that the risks are high within the recruitment practices of third-party labour providers and/or subcontractors. As detailed further in this statement, we take steps to increase our understanding of this risk and to ensure that we are in the best position to respond effectively.	In respect of the print media, the retailer outlets who we predominantly supply consist of large supermarkets, as well as small corner shops and convenience/CTN retailers. While we acknowledge that there may be a risk of modern slavery within these outlets, we do not believe that this presents a high risk. As regards the in-flight entertainment products that are supplied to airlines and other travel points through Dawson Media Direct, we remain open to investigating and understanding the risk of modern slavery within the travel and aviation industry, but currently this is not an area which we have identified, for our purposes, as a high risk.

Policies

As part of our commitment to combating modern slavery, we have implemented the policies listed below. We have also initiated a Regulatory and Policy Steering Committee, which consists of key functional team representation from across our business to help monitor industry and legal developments, share best practice and explore methods of communication and training. This SteerCo ensures that our policies are regularly reviewed and updated where necessary. We have a process of communicating our policies (new and revised) to ensure all of our workforce are properly informed, including adopting web based induction processes and refresher training.

- Ethical Trading Policy;
- Procurement Policy and Supplier Code;
- Dignity at Work Policy;
- Code of Business Conduct;
- Anti-Bribery Policy;
- Anti-Fraud Policy;
- Whistleblowing Policy;

- Open Door Policy.

We also make sure that our suppliers are aware of our key policies and Code of Business Conduct through our procurement portal's "supplier zone", and we encourage them to adhere to the same high standards, including ensuring that they hold their own suppliers to the same standards. These policies have been developed and adopted by Smiths News in order to ensure that we conduct all business in an honest and ethical manner.

Governance, Risk and Compliance

Our Governance

We recognise that Modern Slavery is not something that only happens elsewhere and note that the UK Government estimates there are tens of thousands of people in slavery in Britain today with UK nationals making up the biggest group of potential victims.

At an operational level, the nature and extent of our exposure to the risk of Modern Slavery occurring in our business, as well as our supply chains, is periodically reviewed. However, a formal risk assessment process is being developed and implemented by our employee relations team, our procurement team, and our sub-contractor management team under the direction of senior management. The Executive Team and our Board of Directors exercise overall oversight and responsibility.

Our Risk Process

As part of our risk mapping process we have developed management guidelines based on the criteria set out in the table below. We believe these criteria are the main indicators of modern day slavery risks within our business and have been determined through desktop analysis with reference to various sources¹. This process enables us to identify, assess, mitigate and monitor our main risks, which have been identified as follows:

¹ Anti-Slavery (registered human rights organisation) <https://www.antislavery.org/slavery-today/spot-the-signs-of-slavery/> 2019 UK Annual Report on Modern Slavery Global slavery index

Criteria	Pre-mitigation position	Identified risks	Ongoing Action / Mitigation	Ongoing monitoring and assessment / Due Diligence
Geographical context	The nature of the work of Smiths News includes an inherent risk of modern slavery due to its time sensitive nature and the aspects of difficult and labour-intensive work. Some of our workers may be "at risk" people as they may be foreign workers from areas with high levels of unemployment, may be employed on a temporary basis and / or may be employed through labour brokers, agents or independent service providers (ISPs) and thus become removed from employer obligations.	Sourcing of labour from high-risk countries	We continue to review our relationships with both recruitment agencies for the supply of permanent and temporary resource and our relationships with subcontractors and independent service providers (ISPs) who provide composite delivery services across the Group. We will continue to look to audit the capability of these agencies and the ISPs against our key policies and Code of Business Conduct, together with checking references and verifying payment practices.	While we believe we are doing everything reasonably practicable to limit the opportunity and incidents of modern slavery within our own business as well as our supply chain, we do however remain alive to the potential risk. Before we commence dealings with a new supplier, we will look to conduct a risk-based assessment and may then audit their practices, policies and procedures using our standard modern slavery due diligence questionnaire, with an increasing focus on the suppliers' ethical trading standards. Before we commence dealings with a delivery contractor or ISP, we will seek to apply best practice and look to audit their right to work in the United Kingdom, ensuring that such labour is not forced and ensure that pay is made direct to the recipient's own bank account. Where we source new products and/or services we will periodically undertake supplier audits, whether conducted internally or through external agencies, together with checking supplier references with external third parties. We seek to ensure that all our suppliers adhere to our ethical standards and anti-slavery policies and provide a copy of our Ethical Trading Policy to each supplier. Our standard terms of purchase, available via our procurement portal supplier zone and on all of our purchase orders, cross-refer to our Ethical Trading Policy requirement. We will continue to implement contractual protections in our dealings with certain suppliers to reinforce our ethical standards and anti-slavery policies.
Type of industry and workers	The nature of the work of Smiths News includes an inherent risk of modern slavery due to its time sensitive nature and the aspects of difficult and labour-intensive work. Some of our workers may be "at risk" people as they may be foreign workers from areas with high levels of unemployment, may be employed on a temporary basis and / or may be employed through labour brokers, agents or independent service providers (ISPs) and thus become removed from employer obligations.	Temporary / foreign / ISP or agency workers	We strictly adhere to health & safety requirements, continuously strive to improve our position beyond compliance, report our H&S performance measured against our 'lost time incidents' standard. Through our colleague forums we have sought to create a safe space for conversations with workers and, separately, we ensure that any whistleblowers or persons who raise concerns are adequately protected and supported	
Manner of remuneration	At risk people may be paid per hour, receive cash payments, be at the minimum wage level and/or may not be paid overtime. Workers may not be paid directly but paid through agencies or independent service providers (ISPs)	Non-direct payment of workers		
Benefits and protection	Some of the contracted and/or temporary staff may be 'at risk' and may not receive pension benefits. Such workers are generally not represented by any labour organisations / trade unions and do not have access to legal remedies.	Limited worker access to pensions, and representation		We enforce a strict code of compliance and do not tolerate slavery or human trafficking within our supply chains – if we find evidence of a failure to comply with our policies; we will terminate our relationship with the relevant supplier.

Training

We have acquired and are implementing a policy compliance-training module, which includes a dedicated Modern Slavery element, and we look to educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through such education programmes and ad hoc monitoring of suppliers, employees are encouraged to identify and report any potential breaches of this anti-slavery and human trafficking policy (or any other policy).

We strongly believe that we should work with suppliers in a collaborative manner and that it will not benefit marginalised and “at risk” people if we simply terminated suppliers where concerns are identified. We believe in constructive engagement through education and training programmes, coupled with capacity building, both internally and within our supply chains, to identify and address any problem. As part of this approach, we will look to support “at risk groups” identified within our supply chain wherever possible and to ensure they are made aware of their rights and provided with the necessary support structures to limit the scope for abuse. While we recognise the reputational dangers of non-compliance within our supply chains, we believe that it is more beneficial to work for change and improvement rather than removing a supplier and leaving the abuse unresolved.

Measuring the effectiveness of our actions in Tackling Modern Slavery

What we are doing		Progress against FY2022 Target /KPI	FY2023 Target /KPI
Policy	Ensuring we do all that we can to address the risk of modern slavery both internally and within our supply chains through the strict implementation, and continued enhancement, of our policies directed at addressing modern slavery, and specifically our recruitment practices policies	We have reviewed and updated our policies and improve our internal policy access through a relaunch of our internal repository system, including improved communications and training	We will continue to enhance accessibility to our internal repository system to provide access to a wider base of warehouse operatives (permanent and other employees) and build on our training modules to improve policy understanding and compliance
Risk Management / Due Diligence	Ongoing risk assessment process through screening of new suppliers as well as a keen review of our internal practices that pose the greatest risk. - in line with the implementation of a group-wide people system, we have automated our employee on-boarding processes, thereby minimising manual intervention, enabling improved management information and automating follow-up reviews for 'right to work' checks for our workers; - we have invested in and strengthened our contractor management team, allowing us to standardise our contractor on-boarding process across our businesses; - we have built upon capacity within our procurement system to allow us to more closely monitor our suppliers and conduct additional due diligence where required.	We have continued to strengthen and implement our processes and systems for on-boarding employees and new contractors and to monitor suppliers	Ongoing strengthening and implementation of our processes and systems for on-boarding employees and new contractors and to monitor suppliers
Training	We have raised awareness of anti-slavery and human trafficking issues through a group-wide re-launch of our updated Modern Slavery policy and manager guidelines.	We have included modern slavery awareness training in our web based induction module	We will continue to support our web based induction module through ongoing awareness and access to policy documents
Health and Safety	We have seen an improvement in H&S performance, with Smiths News. We have adopted a measure of 'lost time incidents' as a key indicator for tracking safety and ran a 'Safety First' campaign in our operating locations	Nil reportable incidents for the year	Maintain record on nil reportable incidents year-on-year
Whistle Blowing	We have a whistleblowing hotline and all reports are independently and confidentially investigated	No MS issues reported	All reported issues to be investigated within one week of reporting

Concluding Remarks

This statement has been approved by the Smiths News plc Board of Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015. The statement covers a review of how we have performed in financial year 2022 and constitutes Smiths News's modern slavery and human trafficking statement for the forward looking financial year 2023 (28 August 2022 – 26 August 2023).

We will include in the directors' report accompanying our Annual Report a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on our website post the year-end. This statement will also be available on our website at www.smithsnews.co.uk

David Blackwood

Chairman, September 2022

Policy Administration & Control

DOCUMENT CREATOR	Group Co Sec
DOCUMENT OWNER	Company Secretary & General Counsel
DOCUMENT FILE NAME	Modern Slavery Policy
REVIEW FREQUENCY	Annual
DOCUMENT LOCATION	Corporate Website

Version	Status / Amendment Details	Effective Date	Initials
4	Final	01.08.2021	SM
5	Final	01.09.2022	SM / Board

Manager Guidelines

Smiths News PLC (the Company) is required under the Modern Slavery Act 2015 to ensure that modern slavery is not occurring within our operations or supply chains. The Board is fully committed to preventing acts of modern slavery and human trafficking from occurring within our businesses and supply chains and we take a zero-tolerance approach to non-ethical practices in order to uphold our ethical standards and to combat modern slavery and human trafficking. This procedure supplements the Modern Slavery Policy Statement by setting out the expected requirements for actual and suspected modern slavery and human trafficking within the group.

The Company will not accept any level of unethical behaviour; consequently, any case will be promptly and thoroughly investigated and dealt with appropriately.

Any worker found to be involved in acts of forced labour can expect to be dealt with in accordance with the Company's Disciplinary procedures, which will result in summary dismissal.

Workers should draw particular attention to circumstances where they believe there is an actual or foreseeable risk of improper behaviour by other staff members, contractors or third-party suppliers to the group. All allegations and reported matters of suspected modern slavery will be dealt with in strict confidence and in accordance with the terms of the Whistleblowing Policy, protecting the legitimate personal interests of staff and ensuring that allegations will be investigated without fear of victimisation.

The Company reserves the right to amend the Policy and this procedure from time to time, and without notice.

Scope

This Policy applies to all the group's activities, wherever they are undertaken, to all individuals who work for any group company including contract/agency staff and suppliers. All individuals and organisations conducting a commercial relationship with any group company (e.g. the employees of suppliers or consultants) are required to comply with this Policy and the Ethical Trading Policy.

What is Modern Slavery?

Modern Slavery is an overarching term, which encapsulates all offences of slavery, servitude, forced or compulsory labour and human trafficking:

- **Slavery** is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom;
- **Servitude** is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition;
- **Forced or compulsory labour** involves the coercion, either through direct threats of violence or more subtle forms of compulsion, where the person has not offered him/herself voluntarily;
- **Human trafficking** requires that a person arranges or facilitates the travel of another person with a view to that person being exploited; and
- **Child labour** is defined as children below 12 years old working in any economic activities, those aged 12-14 years old engaged in more than light work and all children engaged in the worst forms of child labour (such as forced or compulsory labour or trafficking of drugs).

Modern Slavery is a hidden crime over an indeterminate duration (as opposed to a one-off occurrence) and typically takes place alongside other criminal activity. Modern Slavery can present itself in many different ways and is likely (but not exclusively) to have the following characteristics:

- Highly vulnerable individuals – many victims of labour exploitation are adult males who have learning difficulties, substance addictions, are homeless or have a mental or physical health issue. Victims may be British or non-British where victims may be particularly vulnerable when they speak little English;
- Low skilled, manual labour – victims tend to be of a transient and temporary workforce and work predominantly in agricultural and construction industries or largely cash based industries in urban areas (such as cleaning, factory work, nail bars and car washes);
- Work for offenders – victims may work directly for the offenders' business at sites they own or control where the offender acts as a gangmaster;

- Work for legitimate businesses – some victims are employed legally but have most or all of their wages taken by offenders through control of the victim's bank account;
- Isolated rural locations – victims tend to be located in isolated rural locations, potentially living on an offenders' property in squalid conditions without access to formal workplaces or services;
- Gang related – victims may be forced to undertake criminal activities by gangs, particularly in the transportation of drugs or money to suburban areas, market and coastal towns;
- Financial fraud – victims are often additionally exploited financially, through identity or benefit fraud.

How to identify slavery

Modern Slavery is a hidden crime, which requires vigilance, awareness and close attention to identify – some of the signs of slavery might include:

- An individual being under the control of someone else and reluctance to interact with others;
- No personal identification on them or unaware of a bank account in their name;
- Few personal belongings and wearing the same or unsuitable clothes; and
- Reluctance to talk to strangers, appear frightened, withdrawn and showing signs of physical or psychological abuse or bullying.

How to deal with suspected slavery

If you have a concern or suspect slavery of or by a fellow employee, you can report it via the following channels (under no circumstances should you approach the person(s) you suspect or inform unauthorised persons of your suspicions):

- Line Manager (if this is appropriate)
- "Speak Up" Telephone Hotline, Tel: 0800 915 2399 (refer to the Whistleblowing Policy for more detail)
- People department or the relevant People business partner
- Head of Internal Audit
- Company Secretary (legal@smithsnews.co.uk)

All these channels have been designed to ensure that staff can report concerns with complete confidentiality.

Managers should take a risk-based approach in reviewing whether slavery exists within the supply chain, ensuring that regular reviews are undertaken to assess which suppliers pose the greatest slavery risk, but remaining equally as vigilant and cautious for all suppliers or contractors. This process may be supported by the Procurement team where appropriate.

If you suspect there is an increased risk of slavery for any supplier or contractor, you should:

- Raise your concerns with your Line Manager (if this is appropriate);
- Undertake a desktop review of the supplier or contractor, by requesting that they complete the Supplier Due Diligence Questionnaire (see Appendix 1);
- Conduct a local thorough audit of the suppliers response, referring to the contractor management team (Operations.Compliance@smithsnews.co.uk) or procurement team (groupprocurement.operations@smithsnews.co.uk) for support where required;
- Ensure that contractual protections are included within the suppliers terms and conditions (see Appendix 2) referring to the Legal Team for support where needed (legal@smithsnews.co.uk)

Investigations

All reported suspected slavery cases will be independently investigated. The Head of Internal Audit will appoint the investigating manager. The People department will also be involved to support the investigation and ensure that statutory disciplinary and grievance procedures are followed. The Investigating Manager or Head of Internal Audit may contact the worker concerned to understand the facts, events and evidence available. This will be completed confidentially and can be held away from business premises if required.

Enforcement

All workers are required to adhere to this Policy. Any employee found to have violated or breached this policy may be subject to disciplinary action up to and including dismissal. Serious breaches of this policy will constitute gross misconduct and lead to summary dismissal.

Further Reading / Information

If there are any questions, please speak to your line manager or the Company Secretary. Please also refer to the following additional policies for background reading:

- Anti-Bribery Policy
- Ethical Trading Policy
- Whistleblowing Policy
- Open Door Policy

Appendix 1 - Modern Slavery Act 2015: Supplier Due Diligence Questionnaire

The purpose of this information request is to help with our due diligence procedures to assess the risk of slavery and human trafficking in our supply chains. Complete answers to this questionnaire will help us to identify and assess the risk of modern slavery and human trafficking in our supply chains. When supplying copies of documents and other requested information, please comply with the following guidelines:

- (a)** provide the appropriate documents or information, or an appropriate negative statement, as soon as is practicable;
- (b)** where you are uncertain of the scope of any question, or the relevance of any information or document, please provide too much rather than too little information;
- (c)** where the same information and documents are to be supplied in response to two or more different questions, you need not repeat your response if all appropriate cross-references are made;
- (d)** please update your responses as more information becomes available or if subsequent events make any earlier responses inaccurate; and

Please note that to assist in our due diligence review, we would expect to be able to hold interviews with your employees, workers, subcontractors and agents.

This is an initial request for information and we may ask for further information in due course.

1. STRUCTURE

Please provide the following information and documents:

1.1 Details of the following information in relation to the business:

- (a)** full company name;
- (b)** any business name(s);
- (c)** registered office address and physical place of business;

1.2 Details of any sub-contractors regarding the supply of services.

2. POLICIES

2.1 Do you agree to comply with our Ethical Trading Policy? If not, please provide details.

2.2 Does your organisation have any written policies and procedures relating to anti-slavery and human trafficking, human rights, ethical trading and/or whistleblowing? If so, please provide copies or links to where these documents can be accessed.

2.3 Is there any other document or values statement by the organisation that you wish to bring to our attention? If so, please provide copies or links to where these documents can be accessed.

2.4 How frequently are your anti-slavery and human trafficking policies and procedure updated (if any)?

2.5 Is your organisation a signatory to or a member of any ethical trading or ethical working conditions initiative, or anti-slavery initiatives or charters? If so, please provide details.

3. RELATIONSHIPS

3.1 Who are your direct and indirect suppliers and subcontractors for the supply of services by you to us and in which countries do they primarily operate?

3.2 Which relationships are critical for the supply of services by you to us?

3.3 Who is responsible for managing these relationships?

3.4 How frequently do you review these relationships?

3.5 Please provide details of any steps you take to mitigate the risk of modern slavery affecting your supply chains, including any labour-related due diligence you conduct on the above suppliers.

4. SERVICES

4.1 Are you aware of any raised risk of modern slavery relating to the supply of services to us? If so, please provide details.

4.2 Is any of the work for the provision of services outsourced? If so, please provide details.

4.3 Are any services provided using contract workers or seasonal workers? If so, please provide details.

5. COMPLIANCE

5.1 How is compliance with your anti-slavery and human trafficking policies and procedures monitored?

5.2 Is senior management involved in enforcing the anti-slavery and human trafficking policies? What actions follow from a breach of the policy?

5.3 Have there been any reports of or concerns raised regarding modern slavery in your business or supply chains? If so, please provide details.

5.4 Is there a mechanism or whistle-blowing policy to encourage concerns about modern slavery to be raised so that they can be investigated?

5.5 Has your business or any of your employees, agents or subcontractors who supply goods or services on your behalf, been investigated under the Modern Slavery Act 2015, or any other legislation relating to modern slavery and human trafficking or human rights generally? If so, please provide details.

6. TRAINING

6.1 Has any anti-slavery and human trafficking awareness training been provided? If so, how, when and to whom is training provided?

6.2 Is tailored or further training is given to higher risk groups, such as your procurement teams?

7. MISCELLANEOUS

7.1 Are there any other matters that should be brought to our attention considering the aim of this due diligence exercise?

Appendix 2 – Contractual Protections

COMPLIANCE WITH LAWS CLAUSE

1 Compliance with Laws

- 1.1 The Supplier agrees with the Customer that it shall, and that it shall procure that its employees, officers, agents, sub-contractors and any other person who performs services or supplies materials for use within the Supplier's supply chain, shall:
- 1.1.1 comply at all times with:
- a) all applicable laws, statutes, regulations, codes of practice, sanctions and other similar controls in force from time to time relating to the provision of the Services including, but not limited to, in relation to:
 - i slavery and human trafficking ("**Anti-Slavery Requirements**") including, but not limited to, the Modern Slavery Act 2015; and
 - ii anti-bribery and anti-corruption ("**Anti-Corruption Requirements**") including, but not limited to, the US Foreign Corrupt Practices Act and the UK Bribery Act 2010,
 - b) the Customer's Ethical Trading Policy (annexed to this Agreement at Appendix []) as the Customer may issue updates thereof from time to time ("**Relevant Policies**"),
(together "**the Relevant Requirements**");
- 1.1.2 not take or knowingly permit any action to be taken that would or might cause or lead the Customer to be in violation of any Relevant Requirements; and
- 1.1.3 at the Customer's request and cost, provide the Customer with any reasonable assistance and information to enable it to perform any activity required by any relevant government or agency for the purpose of complying with Anti-Slavery Requirements and/or Anti-Corruption Requirements.
- 1.2 The Supplier represents and warrants to the Customer that neither it nor any of its respective officers, employees, agents, subcontractors or any person acting on its behalf nor any other person in its supply chain:
- 1.2.1 uses, or has attempted to use, trafficked, bonded, child or forced labour within its supply chain; nor
- 1.2.2 offers, gives or agrees to give any person any inducement or reward (or anything which might reasonably be considered an inducement or reward), financial or otherwise, for the purpose of improperly or unlawfully obtaining a business advantage.
- 1.3 The Supplier agrees that:
- 1.3.1 it will promptly report any breach or potential breach, in relation to this Agreement, of either the Relevant Policies or Clauses 1.2.1 or 1.2.2 to the Customer as soon as it becomes aware of them; and
- 1.3.2 in addition to the Customer's termination rights set out elsewhere in this Agreement, the Customer may (without prejudice to any other right available to it) immediately terminate this Agreement in the event of any breach of this Clause 1 by the Supplier.
- 1.4 The Supplier shall indemnify and keep indemnified the Customer in full and hold it harmless on demand from and against any and all losses, claims, liabilities, costs, proceedings, damages and expenses (including legal and other professional fees and expenses) suffered or incurred by the Customer or for which the Customer may become liable arising out of or in connection with any breach of this Clause 1 by the Supplier.