

This Danesmoor Group Policy is approved by the Board of Directors; it represents their direction to the business on this topic. Compliance with this policy is mandatory.

Danesmoor Group Policy – Modern Slavery & Human Trafficking	
Document Owner:	Group Head of Human Resources
Document Reference:	DMG_POL_015
Revision Number:	005
For Use By:	All staff members
Purpose:	The Modern Slavery and Human Trafficking Policy plays a critical role in promoting ethical business practices, protecting human rights, and ensuring sustainable and responsible operations withing organisations and their supply chains.
Approved By:	Oliver Stephenson
Approval Date:	Sep-24
Review Date:	Sep-25

Revision History			
Version	Date	Author	Summary of Changes
003	Mar-21	Ione Hannam	Change in name of parent company & clarification of entities covered by this statement.
004	Jan-23	Kirsty Bowe	Change in name of policy and reviewed and updated in line with current best practice and legislation
005	Sep-24	Kirsty Bowe	Change in name of policy and reviewed and updated in line with current best practice and legislation

This Danesmoor Group Ltd. Policy is approved by the Board; it represents the Danesmoor Group Ltd. Board's direction to the business on this topic. Compliance with this policy is mandatory through aligning Danesmoor Group Ltd. group companies' processes and people behaviours to the commitments below.

Doc Ref:	DMG_POL_015	Date of Issue:	Sep-24	Revision Number:	005
-----------------	-------------	-----------------------	--------	-------------------------	-----

1. Policy Statement

- 1.1 This Danesmoor Group Ltd. policy statement covers all entities in the Group required to report under the Modern Slavery Act 2015; that is, PWS Distributors Ltd., Danesmoor Ltd. and Life-Kitchens for Living Ltd. The information included in the statement refers to the financial year 2023/2024.
- 1.2 This policy applies to all persons working for us at any of our sites within the UK including County Durham, North Yorkshire and London, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers. Danesmoor Group Ltd. strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

2. Definitions

- 2.1 The Group considers that modern slavery encompasses:
- 2.1.1 Human trafficking
 - 2.1.2 Forced work, through mental or physical threat
 - 2.1.3 Bonded or involuntary prison labour
 - 2.1.4 Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
 - 2.1.5 Being dehumanised, treated as a commodity or being bought or sold as property
 - 2.1.6 Being physically constrained or to have restriction placed on freedom of movement

3. Commitments

- 3.1 The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally its supply chains.
- 3.2 The Group does not enter into business with any other organisation, in the United Kingdom or abroad which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour and expect that our suppliers will hold their own suppliers to the same high standards.
- 3.3 No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom
- 3.4 In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:
- 3.4.1 We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
 - 3.4.2 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not

Doc Ref:	DMG_POL_015	Date of Issue:	Sep-24	Revision Number:	005
-----------------	-------------	-----------------------	--------	-------------------------	-----

engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

- 3.4.3 We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- 3.4.4 We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Sourcing Policy, which sets out the minimum standards required to combat modern slavery and trafficking.
- 3.4.5 Consistent with our risk-based approach we may require:
 - 3.4.5.1 Employment and recruitment agencies and other third parties supplying workers to the Group to confirm their compliance with our Code of Conduct;
 - 3.4.5.2 Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Sourcing Policy.
- 3.4.6 As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Sourcing Policy.
- 3.4.7 If we find that other individuals or organisations working on our behalf have breached this Policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being redressed and whether terminating such relationships might represent the best outcome for those individuals impacted by the breach.
- 3.4.8 A training plan is in place to ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Group require employees to complete an online course or internal workshop.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Doc Ref:	DMG_POL_015	Date of Issue:	Sep-24	Revision Number:	005
-----------------	-------------	-----------------------	--------	-------------------------	-----