

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery (exercising powers of ownership over a person), servitude (the obligation to provide services is imposed by the use of coercion), forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. 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.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we 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.
- 1.3 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.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Chief Financial Officer 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.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

3. COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 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.
- 3.3 You must notify the Chief Financial Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

4. THE RISKS

- 4.1 The principal areas of risk we face, related to slavery and human trafficking, include:
 - i. supply chains
 - ii. recruitment through agencies
- 4.2 We manage these risk areas through our training and awareness and our procedures set out in this policy and our Whistleblowing policy.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1 We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.
- 5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. OUR PROCEDURES

- 6.1 Anti-slavery statement

Although not yet a legal requirement of the Company, we make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

- 6.2 Supply chains

We are updating our procedures with respect to Supply Chain Management. We expect it to take until the end of 2023 to be fully implemented. Until this time the process will be in transition, with some elements of the procedure only partially

in place. Below we set out what we currently do and what we aim to do when the new process is fully in place.

- (a) We currently informally screen supply chains to ensure the potential for slavery and human trafficking is minimised. The new process will formally categorise suppliers in accordance with the risk we deem that they represent. There will be three categories of risk, High, Medium and Low. All suppliers will be reassessed every two years.
- (b) Any supplier that is deemed High Risk will be audited annually to ensure that no exploitation is evident.
- (c) If a company that we do business with indicates any form of exploitation, we will raise this with them and if it is not halted we will cease our relationship with them.
- (d) We currently do not have a requirement for suppliers to have signed a contract with the Company, however, the new process will ensure that all High and Medium Risk suppliers have a Supplier Agreement. And all High Risk suppliers have Quality and Regulatory agreement with the Company.
- (e) Where a Supplier Agreement is in place it will contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.
- (f) We seek to ensure that we can account for each step of our supply process – so that we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:
 - i. All critical suppliers should have a supplier contract which contains an anti-slavery clause.
 - ii. Non-critical suppliers are required to complete a self-assessment questionnaire and if responses are deemed to be negative an alternative source of supply will be found.

6.3 Recruitment

- (a) Using agencies
 - i. Our policy is to only use agreed specified reputable recruitment agencies.
 - ii. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - ensuring that the appropriate ethical policies are held by the agencies

- entering to contractual agreements with the agency
 - investigating reputation
 - ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas)
 - ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- (b) General recruitment
- i. We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
 - ii. We always ensure staff are legally able to work in the UK.
 - iii. We require formal identification for all new employees such as drivers licence or passport.
 - iv. We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- (c) If, through our recruitment process, we suspect someone is being exploited, the Chief Financial Officer will follow our reporting procedures (See Reporting slavery).

7. IDENTIFYING SLAVERY

- 7.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 7.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.
- (a) The person is not in possession of their own passport, identification or travel documents.
 - (b) The person is acting as though they are being instructed or coached by someone else.
 - (c) They allow others to speak for them when spoken to directly.
 - (d) They are dropped off and collected from work.
 - (e) The person is withdrawn or they appear frightened.
 - (f) The person does not seem to be able to contact friends or family freely.
 - (g) The person has limited social interaction or contact with people outside their immediate environment.

(h) This list is not exhaustive.

- 7.3 A person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. However, if you have a suspicion, report it.

8. REPORTING SLAVERY

- 8.1 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 8.2 You are encouraged to raise concerns about any issue or suspicion of modern slavery or breach of human rights in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 8.3 If you believe or suspect a breach of this policy has occurred or that it may occur you must report matters to the Chief Financial Officer as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 8.4 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 or a breach of human rights, raise it with the Chief Financial Officer or in accordance with our Whistleblowing Policy as soon as possible.
- 8.5 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 the Chief Financial Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, as set out in the Staff Handbook.

9. BREACHES OF THIS POLICY

- 9.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 9.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.